

The cost estimate developed and presented in this decommissioning filing is based on numerous fundamental assumptions, including regulatory requirements, project contingencies, low-level radioactive waste disposal practices, high-level radioactive waste management options, and site restoration requirements. As required by Minnesota statutes, a variety of cost studies were created, in order to address the possibility of delays in the DOE delaying acceptance of spent fuel. The Company was required by statute to submit three cost scenario, 60-year, 100-year, and 200-year scenarios. The length of these scenarios is measured from the start of shutdown at the Monticello plant until all spent fuel is removed from all locations. In order to address the Commission's order in our 2011 filing, the Company has made changes to the 100-year and 200-year scenarios. The 2014 version of these scenarios both assume that spent fuel canisters will need to be replaced every 50 years. In the 2011 study, the 200-year scenario assumed that spent fuel canisters would need to be replaced every 100 years.

An extended time period of spent fuel management has multiple impacts including a significant increase in labor costs and extends the period of cost escalation, which creates a higher risk over time. The Company has escalated the 2011 cost estimate in the table below and compared it to the 2014 cost estimate simply to show that the cost estimates were similar changing mostly due to escalation. The comparison table inflates the prior cost estimate using the last approved escalation rate for radiological activities of 3.63 percent along with the proposed escalation rate for radiological activities used in this filing, 4.36 percent.

**Comparison of Current Cost Estimate to Previous Filing
 60-Year Scenario**

	2011 Study in 2014 Inflated Costs (Escalation Rate 3.63%)	2011 Study in 2014 Inflated Costs (Escalation Rate 4.36%)	2014 Cost Estimate
Monticello	\$1,291,394,382	\$1,318,877,957	\$1,307,915,460
PI Unit 1	779,884,504	796,482,078	787,621,437
PI Unit 2	926,963,861	946,691,591	916,805,305
	\$2,998,242,747	\$3,062,051,626	\$3,012,342,202

Without any major changes in assumptions in the decommissioning model for the 60-Year scenario, the increase in cost estimates is driven primarily by inflation

over three years. Only the 100-year and 200-year scenarios saw major changes in assumptions, related to the replacement of spent fuel canisters.

Cost Estimate Cash Flow Summary Schedules

- A.1 Monticello Schedule of Annual Expenditures – 36-Year Schedule
- A.2 Monticello Schedule of Annual Expenditures – 60-Year Schedule
- A.3 Monticello Schedule of Annual Expenditures – 100-Year Schedule
- A.4 Monticello Schedule of Annual Expenditures – 200-Year Schedule
- A.5 Prairie Island Schedule of Annual Expenditures – 36-Year Schedule
- A.6 Prairie Island Schedule of Annual Expenditures – 60-Year Schedule
- A.7 Prairie Island Schedule of Annual Expenditures – 100-Year Schedule
- A.8 Prairie Island Schedule of Annual Expenditures – 200-Year Schedule

SCHEDULE OF TOTAL ANNUAL EXPENDITURES
Monticello Nuclear Generating Plant

Year	Radiological	Spent Fuel	Site Restoration	Yearly Total
2030	\$19,421,458	\$14,046,469	\$152,968	\$33,620,894
2031	81,247,304	31,938,712	589,490	113,775,507
2032	150,680,699	3,968,613	411,835	155,061,148
2033	114,879,533	10,720,883	163,437	125,763,852
2034	72,315,168	17,787,937	4,238	90,107,345
2035	55,823,109	25,443,400	3,100	81,269,609
2036	10,920,499	8,645,419	0	19,565,917
2037	10,890,661	8,621,798	0	19,512,459
2038	10,890,661	8,621,798	0	19,512,459
2039	10,890,661	8,621,798	0	19,512,459
2040	10,920,499	8,645,419	0	19,565,917
2041	10,890,661	8,621,798	0	19,512,459
2042	10,890,661	8,621,798	0	19,512,459
2043	10,890,661	9,294,476	0	20,185,138
2044	10,920,499	8,645,419	0	19,565,917
2045	29,586,137	41,907,919	0	71,494,057
2046	51,267,604	10,504,400	0	61,772,003
2047	7,088,949	6,415,942	17,736,599	31,241,490
2048	108,754	7,760,691	20,321,933	28,191,379
2049	0	6,094,520	0	6,094,520
2050	0	7,776,215	0	7,776,215
2051	0	6,094,520	0	6,094,520
2052	0	8,129,252	0	8,129,252
2053	0	7,776,215	0	7,776,215
2054	0	6,094,520	0	6,094,520
2055	0	7,776,215	0	7,776,215
2056	0	7,792,912	0	7,792,912
2057	0	6,094,520	0	6,094,520
2058	0	8,112,554	0	8,112,554
2059	0	6,094,520	0	6,094,520
2060	0	7,792,912	0	7,792,913
2061	0	6,094,520	0	6,094,520
2062	0	7,776,215	0	7,776,216
2063	0	6,094,520	0	6,094,520
2064	0	7,792,912	0	7,792,913
2065	0	6,094,520	0	6,094,520
2066	9,663,000	6,755,181	0	16,418,181
2067	7,263,500	0	1,722,500	8,986,000
	\$697,450,681	\$375,071,434	\$41,106,099	\$1,113,628,217

SCHEDULE OF TOTAL ANNUAL EXPENDITURES
Monticello Nuclear Generating Plant

Year	Radiological	Spent Fuel	Site Restoration	Yearly Total
2030	\$19,421,458	\$10,567,348	\$152,968	\$30,141,775
2031	81,247,304	24,394,724	589,490	106,231,518
2032	150,680,711	4,030,061	411,835	155,122,607
2033	114,879,541	11,272,002	163,437	126,314,980
2034	72,315,168	18,842,511	4,238	91,161,917
2035	55,823,109	26,231,307	3,100	82,057,516
2036	10,920,499	8,706,796	0	19,627,294
2037	10,890,661	8,683,174	0	19,573,836
2038	10,890,661	8,683,174	0	19,573,836
2039	10,890,661	8,683,174	0	19,573,836
2040	10,920,499	8,706,796	0	19,627,294
2041	10,890,661	8,683,174	0	19,573,836
2042	10,890,661	8,683,174	0	19,573,836
2043	10,890,661	8,683,174	0	19,573,836
2044	10,920,499	8,706,796	0	19,627,294
2045	29,586,137	40,014,158	0	69,600,296
2046	51,267,604	9,061,852	0	60,329,456
2047	7,088,949	5,513,294	17,736,597	30,338,841
2048	108,754	6,850,935	20,321,932	27,281,620
2049	0	5,989,212	0	5,989,212
2050	0	14,680,018	0	14,680,018
2051	0	19,430,500	0	19,430,500
2052	0	11,529,270	0	11,529,270
2053	0	17,847,006	0	17,847,006
2054	0	22,597,489	0	22,597,489
2055	0	5,927,836	0	5,927,836
2056	0	5,944,077	0	5,944,077
2057	0	5,927,836	0	5,927,836
2058	0	5,927,836	0	5,927,836
2059	0	5,927,836	0	5,927,836
2060	0	5,944,077	0	5,944,077
2061	0	5,927,836	0	5,927,836
2062	0	5,927,836	0	5,927,836
2063	0	5,927,836	0	5,927,836
2064	0	5,944,077	0	5,944,077
2065	0	5,927,836	0	5,927,836
2066	0	5,927,836	0	5,927,836
2067	0	5,927,836	0	5,927,836
2068	0	5,944,077	0	5,944,077
2069	0	5,927,836	0	5,927,836
2070	0	5,927,836	0	5,927,836
2071	0	5,927,836	0	5,927,836

SCHEDULE OF TOTAL ANNUAL EXPENDITURES
Monticello Nuclear Generating Plant

Year	Radiological	Spent Fuel	Site Restoration	Yearly Total
2072	0	5,944,077	0	5,944,077
2073	0	5,927,836	0	5,927,836
2074	0	5,927,836	0	5,927,836
2075	0	5,927,836	0	5,927,836
2076	0	5,944,077	0	5,944,077
2077	0	6,866,280	0	6,866,280
2078	0	8,212,366	0	8,212,367
2079	0	7,876,027	0	7,876,028
2080	0	7,892,998	0	7,892,998
2081	0	7,876,027	0	7,876,028
2082	0	8,212,366	0	8,212,367
2083	0	7,876,027	0	7,876,028
2084	0	7,892,998	0	7,892,998
2085	0	7,876,027	0	7,876,028
2086	0	8,212,366	0	8,212,367
2087	0	7,876,027	0	7,876,028
2088	0	10,348,028	0	10,348,028
2089	0	7,876,027	0	7,876,028
2090	9,602,119	6,867,010	0	16,469,129
2091	7,378,199	16,971	1,668,830	9,064,000
	\$697,504,522	\$569,358,511	\$41,052,426	\$1,307,915,460

SCHEDULE OF TOTAL ANNUAL EXPENDITURES
Monticello Nuclear Generating Plant

Year	Radiological	Spent Fuel	Site Restoration	Yearly Total
2030	\$19,421,458	\$10,567,348	\$152,968	\$30,141,775
2031	81,247,304	24,394,724	589,490	106,231,518
2032	150,680,711	4,030,061	411,835	155,122,607
2033	114,879,541	11,272,002	163,437	126,314,980
2034	72,315,168	18,842,511	4,238	91,161,917
2035	55,823,109	26,231,307	3,100	82,057,516
2036	10,920,499	8,706,796	0	19,627,294
2037	10,890,661	8,683,174	0	19,573,836
2038	10,890,661	8,683,174	0	19,573,836
2039	10,890,661	8,683,174	0	19,573,836
2040	10,920,499	8,706,796	0	19,627,294
2041	10,890,661	8,683,174	0	19,573,836
2042	10,890,661	8,683,174	0	19,573,836
2043	10,890,661	8,683,174	0	19,573,836
2044	10,920,499	8,706,796	0	19,627,294
2045	29,586,137	40,014,158	0	69,600,296
2046	51,267,604	9,061,852	0	60,329,456
2047	7,088,950	5,603,813	17,736,597	30,429,360
2048	108,755	6,914,708	20,321,932	27,345,395
2049	0	8,000,509	0	8,000,509
2050	0	13,524,326	0	13,524,326
2051	0	13,524,326	0	13,524,326
2052	0	13,546,077	0	13,546,077
2053	0	13,524,326	0	13,524,326
2054	0	13,524,326	0	13,524,326
2055	0	13,524,326	0	13,524,326
2056	0	26,946,857	0	26,946,857
2057	0	13,524,326	0	13,524,326
2058	0	44,212,010	0	44,212,010
2059	0	13,524,326	0	13,524,326
2060	0	13,546,077	0	13,546,077
2061	0	13,524,326	0	13,524,326
2062	0	13,524,326	0	13,524,326
2063	0	44,212,010	0	44,212,010
2064	0	13,546,077	0	13,546,077
2065	0	13,524,326	0	13,524,326
2066	0	44,212,010	0	44,212,010
2067	0	13,524,326	0	13,524,326
2068	0	13,546,077	0	13,546,077
2069	0	13,524,326	0	13,524,326
2070	0	13,524,326	0	13,524,326
2071	0	13,524,326	0	13,524,326

SCHEDULE OF TOTAL ANNUAL EXPENDITURES
Monticello Nuclear Generating Plant

Year	Radiological	Spent Fuel	Site Restoration	Yearly Total
2072	0	13,546,077	0	13,546,077
2073	0	13,524,326	0	13,524,326
2074	0	13,524,326	0	13,524,326
2075	0	13,524,326	0	13,524,326
2076	0	13,546,077	0	13,546,077
2077	0	13,524,326	0	13,524,326
2078	0	13,524,326	0	13,524,326
2079	0	13,524,326	0	13,524,326
2080	0	44,233,761	0	44,233,761
2081	0	13,524,326	0	13,524,326
2082	0	13,524,326	0	13,524,326
2083	0	13,524,326	0	13,524,326
2084	0	13,546,077	0	13,546,077
2085	0	53,418,315	0	53,418,315
2086	0	13,524,326	0	13,524,326
2087	0	13,524,326	0	13,524,326
2088	0	16,001,107	0	16,001,107
2089	0	13,524,326	0	13,524,326
2090	0	13,524,326	0	13,524,326
2091	0	21,441,797	0	21,441,797
2092	0	13,546,077	0	13,546,077
2093	0	19,858,303	0	19,858,303
2094	0	24,608,786	0	24,608,786
2095	0	50,756,401	0	50,756,401
2096	0	7,960,884	0	7,960,884
2097	0	7,939,133	0	7,939,133
2098	0	7,939,133	0	7,939,133
2099	0	7,939,133	0	7,939,133
2100	0	7,939,133	0	7,939,133
2101	0	7,939,133	0	7,939,133
2102	0	7,939,133	0	7,939,133
2103	0	7,939,133	0	7,939,133
2104	0	7,960,884	0	7,960,884
2105	0	7,939,133	0	7,939,133
2106	0	7,939,133	0	7,939,133
2107	0	7,939,133	0	7,939,133
2108	0	7,960,884	0	7,960,884
2109	0	7,939,133	0	7,939,133
2110	0	7,939,133	0	7,939,133
2111	0	7,939,133	0	7,939,133
2112	0	7,960,884	0	7,960,884
2113	0	7,939,133	0	7,939,133

SCHEDULE OF TOTAL ANNUAL EXPENDITURES
Monticello Nuclear Generating Plant

Year	Radiological	Spent Fuel	Site Restoration	Yearly Total
2114	0	7,939,133	0	7,939,133
2115	0	7,939,133	0	7,939,133
2116	0	7,960,884	0	7,960,884
2117	0	6,867,010	0	6,867,011
2118	0	8,212,367	0	8,212,367
2119	0	7,876,028	0	7,876,028
2120	0	7,892,998	0	7,892,999
2121	0	7,876,028	0	7,876,028
2122	0	8,212,367	0	8,212,367
2123	0	7,876,028	0	7,876,028
2124	0	7,892,998	0	7,892,999
2125	0	7,876,028	0	7,876,028
2126	0	8,212,367	0	8,212,367
2127	0	7,876,028	0	7,876,028
2128	0	10,348,028	0	10,348,029
2129	0	7,876,028	0	7,876,028
2130	9,602,119	6,867,010	0	16,469,129
2131	8,084,170	0	1,668,830	9,753,000
	\$698,210,496	\$1,385,171,066	\$41,052,426	\$2,124,433,988

SCHEDULE OF TOTAL ANNUAL EXPENDITURES
Monticello Nuclear Generating Plant

Year	Radiological	Spent Fuel	Site Restoration	Yearly Total
2030	\$19,421,458	\$10,567,348	\$152,968	\$30,141,775
2031	81,247,304	24,394,724	589,490	106,231,518
2032	150,680,711	4,030,061	411,835	155,122,607
2033	114,879,541	11,272,002	163,437	126,314,980
2034	72,315,168	18,842,511	4,238	91,161,917
2035	55,823,109	26,231,307	3,100	82,057,516
2036	10,920,499	8,706,796	0	19,627,294
2037	10,890,661	8,683,174	0	19,573,836
2038	10,890,661	8,683,174	0	19,573,836
2039	10,890,661	8,683,174	0	19,573,836
2040	10,920,499	8,706,796	0	19,627,294
2041	10,890,661	8,683,174	0	19,573,836
2042	10,890,661	8,683,174	0	19,573,836
2043	10,890,661	8,683,174	0	19,573,836
2044	10,920,499	8,706,796	0	19,627,294
2045	29,586,137	40,014,158	0	69,600,296
2046	51,267,604	9,061,852	0	60,329,456
2047	7,088,950	5,603,813	17,736,597	30,429,360
2048	108,755	7,000,006	20,321,932	27,430,692
2049	0	9,112,424	0	9,112,424
2050	0	14,636,241	0	14,636,241
2051	0	14,636,241	0	14,636,241
2052	0	14,661,038	0	14,661,038
2053	0	14,636,241	0	14,636,241
2054	0	14,636,241	0	14,636,241
2055	0	14,636,241	0	14,636,241
2056	0	28,061,819	0	28,061,819
2057	0	14,636,241	0	14,636,241
2058	0	45,321,934	0	45,321,934
2059	0	14,636,241	0	14,636,241
2060	0	14,661,038	0	14,661,038
2061	0	14,636,241	0	14,636,241
2062	0	14,636,241	0	14,636,241
2063	0	45,321,934	0	45,321,934
2064	0	14,661,038	0	14,661,038
2065	0	14,636,241	0	14,636,241
2066	0	45,321,934	0	45,321,934
2067	0	14,636,241	0	14,636,241
2068	0	14,661,038	0	14,661,038
2069	0	14,636,241	0	14,636,241
2070	0	14,636,241	0	14,636,241
2071	0	14,636,241	0	14,636,241

SCHEDULE OF TOTAL ANNUAL EXPENDITURES
Monticello Nuclear Generating Plant

Year	Radiological	Spent Fuel	Site Restoration	Yearly Total
2072	0	14,661,038	0	14,661,038
2073	0	14,636,241	0	14,636,241
2074	0	14,636,241	0	14,636,241
2075	0	14,636,241	0	14,636,241
2076	0	14,661,038	0	14,661,038
2077	0	14,636,241	0	14,636,241
2078	0	14,636,241	0	14,636,241
2079	0	14,636,241	0	14,636,241
2080	0	45,346,732	0	45,346,732
2081	0	14,636,241	0	14,636,241
2082	0	14,636,241	0	14,636,241
2083	0	14,636,241	0	14,636,241
2084	0	14,661,038	0	14,661,038
2085	0	54,527,642	0	54,527,642
2086	0	14,636,241	0	14,636,241
2087	0	14,636,241	0	14,636,241
2088	0	17,116,068	0	17,116,068
2089	0	14,636,241	0	14,636,241
2090	0	14,636,241	0	14,636,241
2091	0	14,636,241	0	14,636,241
2092	0	14,661,038	0	14,661,038
2093	0	14,636,241	0	14,636,241
2094	0	14,636,241	0	14,636,241
2095	0	57,450,908	0	57,450,908
2096	0	14,661,038	0	14,661,038
2097	0	14,636,241	0	14,636,241
2098	0	14,636,241	0	14,636,241
2099	0	14,636,241	0	14,636,241
2100	0	14,636,241	0	14,636,241
2101	0	14,636,241	0	14,636,241
2102	0	14,636,241	0	14,636,241
2103	0	14,636,241	0	14,636,241
2104	0	14,661,038	0	14,661,038
2105	0	14,636,241	0	14,636,241
2106	0	14,636,241	0	14,636,241
2107	0	14,636,241	0	14,636,241
2108	0	45,346,732	0	45,346,732
2109	0	14,636,241	0	14,636,241
2110	0	14,636,241	0	14,636,241
2111	0	14,636,241	0	14,636,241
2112	0	14,661,038	0	14,661,038
2113	0	45,321,934	0	45,321,934

SCHEDULE OF TOTAL ANNUAL EXPENDITURES
Monticello Nuclear Generating Plant

Year	Radiological	Spent Fuel	Site Restoration	Yearly Total
2114	0	14,636,241	0	14,636,241
2115	0	14,636,241	0	14,636,241
2116	0	45,346,732	0	45,346,732
2117	0	14,636,241	0	14,636,241
2118	0	14,636,241	0	14,636,241
2119	0	14,636,241	0	14,636,241
2120	0	14,661,038	0	14,661,038
2121	0	14,636,241	0	14,636,241
2122	0	14,636,241	0	14,636,241
2123	0	14,636,241	0	14,636,241
2124	0	14,661,038	0	14,661,038
2125	0	14,636,241	0	14,636,241
2126	0	14,636,241	0	14,636,241
2127	0	14,636,241	0	14,636,241
2128	0	17,116,068	0	17,116,068
2129	0	14,636,241	0	14,636,241
2130	0	45,321,934	0	45,321,934
2131	0	14,636,241	0	14,636,241
2132	0	14,661,038	0	14,661,038
2133	0	14,636,241	0	14,636,241
2134	0	14,636,241	0	14,636,241
2135	0	54,527,642	0	54,527,642
2136	0	14,661,038	0	14,661,038
2137	0	14,636,241	0	14,636,241
2138	0	14,636,241	0	14,636,241
2139	0	14,636,241	0	14,636,241
2140	0	14,661,038	0	14,661,038
2141	0	14,636,241	0	14,636,241
2142	0	14,636,241	0	14,636,241
2143	0	14,636,241	0	14,636,241
2144	0	14,661,038	0	14,661,038
2145	0	57,450,908	0	57,450,908
2146	0	14,636,241	0	14,636,241
2147	0	14,636,241	0	14,636,241
2148	0	14,661,038	0	14,661,038
2149	0	14,636,241	0	14,636,241
2150	0	14,636,241	0	14,636,241
2151	0	14,636,241	0	14,636,241
2152	0	14,661,038	0	14,661,038
2153	0	14,636,241	0	14,636,241
2154	0	14,636,241	0	14,636,241
2155	0	14,636,241	0	14,636,241

SCHEDULE OF TOTAL ANNUAL EXPENDITURES
Monticello Nuclear Generating Plant

Year	Radiological	Spent Fuel	Site Restoration	Yearly Total
2156	0	14,661,038	0	14,661,038
2157	0	14,636,241	0	14,636,241
2158	0	45,321,934	0	45,321,934
2159	0	14,636,241	0	14,636,241
2160	0	14,661,038	0	14,661,038
2161	0	14,636,241	0	14,636,241
2162	0	14,636,241	0	14,636,241
2163	0	45,321,934	0	45,321,934
2164	0	14,661,038	0	14,661,038
2165	0	14,636,241	0	14,636,241
2166	0	45,321,934	0	45,321,934
2167	0	14,636,241	0	14,636,241
2168	0	17,116,068	0	17,116,068
2169	0	14,636,241	0	14,636,241
2170	0	14,636,241	0	14,636,241
2171	0	14,636,241	0	14,636,241
2172	0	14,661,038	0	14,661,038
2173	0	14,636,241	0	14,636,241
2174	0	14,636,241	0	14,636,241
2175	0	14,636,241	0	14,636,241
2176	0	14,661,038	0	14,661,038
2177	0	14,636,241	0	14,636,241
2178	0	14,636,241	0	14,636,241
2179	0	14,636,241	0	14,636,241
2180	0	45,346,732	0	45,346,732
2181	0	14,636,241	0	14,636,241
2182	0	14,636,241	0	14,636,241
2183	0	14,636,241	0	14,636,241
2184	0	14,661,038	0	14,661,038
2185	0	54,527,642	0	54,527,642
2186	0	14,636,241	0	14,636,241
2187	0	14,636,241	0	14,636,241
2188	0	14,661,038	0	14,661,038
2189	0	14,636,241	0	14,636,241
2190	0	17,803,229	0	17,803,229
2191	0	22,553,712	0	22,553,712
2192	0	14,661,038	0	14,661,038
2193	0	20,970,218	0	20,970,218
2194	0	25,720,701	0	25,720,701
2195	0	51,865,715	0	51,865,715
2196	0	9,075,845	0	9,075,845
2197	0	9,051,048	0	9,051,048

SCHEDULE OF TOTAL ANNUAL EXPENDITURES
Monticello Nuclear Generating Plant

Year	Radiological	Spent Fuel	Site Restoration	Yearly Total
2198	0	9,051,048	0	9,051,048
2199	0	9,051,048	0	9,051,048
2200	0	9,051,048	0	9,051,048
2201	0	9,051,048	0	9,051,048
2202	0	9,051,048	0	9,051,048
2203	0	9,051,048	0	9,051,048
2204	0	9,075,845	0	9,075,845
2205	0	9,051,048	0	9,051,048
2206	0	9,051,048	0	9,051,048
2207	0	9,051,048	0	9,051,048
2208	0	42,216,569	0	42,216,569
2209	0	9,051,048	0	9,051,048
2210	0	9,051,048	0	9,051,048
2211	0	9,051,048	0	9,051,048
2212	0	9,075,845	0	9,075,845
2213	0	39,736,741	0	39,736,741
2214	0	9,051,048	0	9,051,048
2215	0	9,051,048	0	9,051,048
2216	0	9,075,845	0	9,075,845
2217	0	6,867,010	0	6,867,010
2218	0	8,212,367	0	8,212,367
2219	0	7,876,027	0	7,876,028
2220	0	7,892,998	0	7,892,998
2221	0	7,876,027	0	7,876,028
2222	0	8,212,367	0	8,212,367
2223	0	7,876,027	0	7,876,028
2224	0	7,892,998	0	7,892,998
2225	0	7,876,027	0	7,876,028
2226	0	8,212,367	0	8,212,367
2227	0	7,876,027	0	7,876,028
2228	0	7,892,998	0	7,892,998
2229	0	7,876,027	0	7,876,028
2230	9,602,119	6,867,010	0	16,469,129
2231	7,706,256	0	2,046,976	9,753,231
	\$697,832,580	\$3,405,467,519	\$41,430,572	\$4,144,730,672

SCHEDULE OF TOTAL ANNUAL EXPENDITURES
Prairie Island Nuclear Generating Plant Unit 1

Year	Radiological	Spent Fuel	Site Restoration	Yearly Total
2033	\$25,245,893	\$850,895	\$258,731	\$26,355,519
2034	77,617,360	3,982,401	1,060,150	82,659,910
2035	115,513,707	16,109,692	1,944,088	133,567,487
2036	91,518,692	12,209,508	2,058,613	105,786,813
2037	47,443,762	9,253,503	1,302,185	57,999,449
2038	4,921,673	9,629,505	61,334	14,612,512
2039	4,921,673	9,629,505	61,334	14,612,512
2040	4,935,157	9,655,887	61,502	14,652,546
2041	4,921,673	9,629,505	61,334	14,612,512
2042	4,921,673	9,629,505	61,334	14,612,512
2043	4,921,673	9,629,505	61,334	14,612,512
2044	4,935,157	9,655,887	61,502	14,652,546
2045	4,921,673	9,629,505	61,334	14,612,512
2046	4,921,673	9,629,505	61,334	14,612,512
2047	4,921,673	9,629,505	61,334	14,612,512
2048	4,935,157	9,655,887	61,502	14,652,546
2049	10,851,624	8,179,706	61,334	19,092,664
2050	32,935,330	998,637	61,334	33,995,301
2051	8,553,253	2,125,432	11,589,297	22,267,982
2052	96,310	3,053,778	17,939,615	21,089,703
2053	45,260	3,298,592	8,430,639	11,774,491
2054	0	4,196,882	0	4,196,882
2055	0	3,524,204	0	3,524,204
2056	0	3,533,859	0	3,533,859
2057	0	4,196,882	0	4,196,882
2058	0	3,524,204	0	3,524,204
2059	0	4,196,882	0	4,196,882
2060	0	3,533,859	0	3,533,859
2061	0	4,196,882	0	4,196,882
2062	0	3,524,204	0	3,524,204
2063	0	4,196,882	0	4,196,882
2064	0	3,533,859	0	3,533,859
2065	11,050,246	4,196,898	0	15,247,144
2066	1,471,425	0	822,778	2,294,203
	\$476,521,715	\$212,421,342	\$46,203,941	\$735,146,998

SCHEDULE OF TOTAL ANNUAL EXPENDITURES
Prairie Island Nuclear Generating Plant Unit 2

Year	Radiological	Spent Fuel	Site Restoration	Yearly Total
2034	\$9,569,899	\$3,536,194	\$54,987	\$13,161,081
2035	60,329,266	18,397,364	390,765	79,117,394
2036	109,834,263	8,980,603	1,832,518	120,647,384
2037	107,666,238	7,651,399	2,148,588	117,466,225
2038	91,781,503	6,699,189	1,894,535	100,375,226
2039	15,058,917	13,761,560	191,918	29,012,395
2040	9,199,725	14,342,403	61,502	23,603,630
2041	9,174,589	14,303,216	61,334	23,539,139
2042	9,174,589	14,303,216	61,334	23,539,139
2043	9,174,589	14,303,216	61,334	23,539,139
2044	9,199,725	14,342,403	61,502	23,603,630
2045	9,174,589	14,303,216	61,334	23,539,139
2046	9,174,589	14,303,216	61,334	23,539,139
2047	9,174,589	14,303,216	61,334	23,539,139
2048	9,199,725	14,342,403	61,502	23,603,630
2049	15,195,163	12,033,917	61,334	27,290,414
2050	38,137,300	998,637	61,334	39,197,270
2051	10,590,651	2,125,432	14,870,672	27,586,755
2052	41,182	3,053,778	23,028,526	26,123,486
2053	19,353	3,298,592	10,822,149	14,140,094
2054	0	4,196,882	0	4,196,882
2055	0	3,524,204	0	3,524,204
2056	0	3,533,859	0	3,533,859
2057	0	4,196,882	0	4,196,882
2058	0	3,524,204	0	3,524,204
2059	0	4,196,882	0	4,196,882
2060	0	3,533,859	0	3,533,859
2061	0	4,196,882	0	4,196,882
2062	0	3,524,204	0	3,524,204
2063	0	4,196,882	0	4,196,882
2064	0	3,533,859	0	3,533,859
2065	9,698,476	4,196,898	0	13,895,374
2066	1,471,425	0	642,016	2,113,441
	\$552,040,346	\$255,738,672	\$56,551,850	\$864,330,868

SCHEDULE OF TOTAL ANNUAL EXPENDITURES
Prairie Island Nuclear Generating Plant Unit 1

Year	Radiological	Spent Fuel	Site	Yearly Total
			Restoration	
2033	\$25,245,893	\$850,895	\$258,731	\$26,355,519
2034	77,617,361	3,925,760	1,060,150	82,603,271
2035	115,513,707	16,628,759	1,944,088	134,086,555
2036	91,518,687	13,332,026	2,058,613	106,909,326
2037	47,443,756	12,450,122	1,302,185	61,196,063
2038	4,921,672	2,238,460	61,334	7,221,467
2039	4,921,672	8,891,096	61,334	13,874,102
2040	4,935,157	2,244,593	61,502	7,241,251
2041	4,921,672	15,543,732	61,334	20,526,738
2042	4,921,672	2,238,460	61,334	7,221,467
2043	4,921,672	15,543,732	61,334	20,526,738
2044	4,935,157	2,244,593	61,502	7,241,251
2045	4,921,672	15,543,732	61,334	20,526,738
2046	4,921,672	2,238,460	61,334	7,221,467
2047	4,921,672	15,543,732	61,334	20,526,738
2048	4,935,157	2,244,593	61,502	7,241,251
2049	10,851,624	22,042,532	61,334	32,955,490
2050	32,935,330	935,936	61,334	33,932,600
2051	8,553,252	2,304,713	11,589,297	22,447,263
2052	96,310	3,418,926	17,939,615	21,454,851
2053	45,260	3,825,877	8,430,639	12,301,776
2054	0	4,365,043	0	4,365,043
2055	0	4,028,704	0	4,028,704
2056	0	4,542,868	0	4,542,868
2057	0	4,028,704	0	4,028,704
2058	0	3,860,534	0	3,860,534
2059	0	4,196,873	0	4,196,873
2060	0	4,038,359	0	4,038,359
2061	0	4,196,873	0	4,196,873
2062	0	4,196,873	0	4,196,873
2063	0	4,196,873	0	4,196,873
2064	0	4,038,359	0	4,038,359
2065	0	4,196,873	0	4,196,873
2066	0	4,196,873	0	4,196,873
2067	0	4,028,704	0	4,028,704
2068	0	4,206,529	0	4,206,529
2069	0	4,196,873	0	4,196,873
2070	0	4,028,704	0	4,028,704
2071	0	4,196,873	0	4,196,873
2072	0	4,206,529	0	4,206,529
2073	0	4,028,704	0	4,028,704
2074	0	4,196,873	0	4,196,873
2075	0	5,424,388	0	5,424,388
2076	0	4,038,359	0	4,038,359
2077	11,050,246	4,028,720	0	15,078,965
2078	1,471,425	0	822,778	2,294,203
	\$476,521,702	\$264,895,795	\$46,203,941	\$787,621,436

SCHEDULE OF TOTAL ANNUAL EXPENDITURES
Prairie Island Nuclear Generating Plant Unit 2

Year	Radiological	Spent Fuel	Site	Yearly Total
			Restoration	
2034	\$9,569,898	\$3,438,926	\$54,987	\$13,063,811
2035	60,329,258	18,303,297	390,765	79,023,320
2036	109,834,268	10,762,920	1,832,518	122,429,706
2037	107,666,243	8,261,345	2,148,588	118,076,175
2038	91,781,503	6,026,510	1,894,535	99,702,549
2039	15,058,917	12,670,326	191,918	27,921,161
2040	9,199,725	6,545,128	61,502	15,806,355
2041	9,174,589	19,832,517	61,334	29,068,440
2042	9,174,589	6,527,245	61,334	15,763,168
2043	9,174,589	19,832,517	61,334	29,068,440
2044	9,199,725	6,545,128	61,502	15,806,355
2045	9,174,589	19,832,517	61,334	29,068,440
2046	9,174,589	6,527,245	61,334	15,763,168
2047	9,174,589	19,832,517	61,334	29,068,440
2048	9,199,725	6,545,128	61,502	15,806,355
2049	15,195,163	25,579,311	61,334	40,835,808
2050	38,137,305	935,936	61,334	39,134,575
2051	10,590,656	2,304,713	14,870,672	27,766,041
2052	41,183	3,418,926	23,028,526	26,488,635
2053	19,354	3,825,877	10,822,149	14,667,380
2054	0	4,365,043	0	4,365,043
2055	0	4,028,704	0	4,028,704
2056	0	4,542,868	0	4,542,868
2057	0	4,028,704	0	4,028,704
2058	0	3,860,534	0	3,860,534
2059	0	4,196,873	0	4,196,873
2060	0	4,038,359	0	4,038,359
2061	0	4,196,873	0	4,196,873
2062	0	4,196,873	0	4,196,873
2063	0	4,196,873	0	4,196,873
2064	0	4,038,359	0	4,038,359
2065	0	4,196,873	0	4,196,873
2066	0	4,196,873	0	4,196,873
2067	0	4,028,704	0	4,028,704
2068	0	4,206,529	0	4,206,529
2069	0	4,196,873	0	4,196,873
2070	0	4,028,704	0	4,028,704
2071	0	4,196,873	0	4,196,873
2072	0	4,206,529	0	4,206,529
2073	0	4,028,704	0	4,028,704
2074	0	4,196,873	0	4,196,873
2075	0	5,424,388	0	5,424,388
2076	0	4,038,359	0	4,038,359
2077	9,698,476	4,028,720	0	13,727,195
2078	1,471,425	0	642,016	2,113,441
	\$552,040,358	\$308,213,097	\$56,551,850	\$916,805,304

SCHEDULE OF TOTAL ANNUAL EXPENDITURES
Prairie Island Nuclear Generating Plant Unit 1

Year	Radiological	Spent Fuel	Site	Yearly Total
			Restoration	
2033	\$25,245,893	\$850,895	\$258,731	\$26,355,519
2034	77,617,361	3,925,760	1,060,150	82,603,271
2035	115,513,707	16,628,759	1,944,088	134,086,555
2036	91,518,687	13,332,026	2,058,613	106,909,326
2037	47,443,756	12,450,122	1,302,185	61,196,063
2038	4,921,672	2,238,460	61,334	7,221,467
2039	4,921,672	8,891,096	61,334	13,874,102
2040	4,935,157	2,244,593	61,502	7,241,251
2041	4,921,672	15,543,732	61,334	20,526,738
2042	4,921,672	2,238,460	61,334	7,221,467
2043	4,921,672	15,543,732	61,334	20,526,738
2044	4,935,157	2,244,593	61,502	7,241,251
2045	4,921,672	15,543,732	61,334	20,526,738
2046	4,921,672	2,238,460	61,334	7,221,467
2047	4,921,672	15,543,732	61,334	20,526,738
2048	4,935,157	2,244,593	61,502	7,241,251
2049	10,851,624	22,953,566	61,334	33,866,524
2050	32,935,330	5,413,492	61,334	38,410,156
2051	8,553,254	9,800,141	11,557,313	29,910,708
2052	96,312	14,164,702	17,890,012	32,151,026
2053	45,261	17,184,160	8,407,328	25,636,749
2054	0	19,907,200	0	19,907,200
2055	0	19,907,200	0	19,907,200
2056	0	15,264,526	0	15,264,526
2057	0	11,530,247	0	11,530,247
2058	0	11,530,247	0	11,530,247
2059	0	4,084,067	0	4,084,067
2060	0	15,264,526	0	15,264,526
2061	0	11,530,247	0	11,530,247
2062	0	15,253,337	0	15,253,337
2063	0	15,253,337	0	15,253,337
2064	0	4,095,256	0	4,095,256
2065	0	11,530,247	0	11,530,247
2066	0	4,084,067	0	4,084,067
2067	0	15,253,337	0	15,253,337
2068	0	11,541,436	0	11,541,436
2069	0	4,084,067	0	4,084,067
2070	0	15,253,337	0	15,253,337
2071	0	11,530,247	0	11,530,247
2072	0	4,095,256	0	4,095,256
2073	0	11,530,247	0	11,530,247
2074	0	16,480,852	0	16,480,852
2075	0	4,084,067	0	4,084,067
2076	0	11,541,436	0	11,541,436
2077	0	15,253,337	0	15,253,337
2078	0	4,084,067	0	4,084,067
2079	0	11,530,247	0	11,530,247

SCHEDULE OF TOTAL ANNUAL EXPENDITURES
Prairie Island Nuclear Generating Plant Unit 1

Year	Site			Yearly Total
	Radiological	Spent Fuel	Restoration	
2080	0	11,541,436	0	11,541,436
2081	0	4,084,067	0	4,084,067
2082	0	7,807,157	0	7,807,157
2083	0	4,084,067	0	4,084,067
2084	0	4,095,256	0	4,095,256
2085	0	11,530,247	0	11,530,247
2086	0	26,422,607	0	26,422,607
2087	0	4,084,067	0	4,084,067
2088	0	18,987,616	0	18,987,616
2089	0	4,084,067	0	4,084,067
2090	0	11,530,247	0	11,530,247
2091	0	3,869,024	0	3,869,024
2092	0	19,107,402	0	19,107,402
2093	0	4,205,363	0	4,205,363
2094	0	19,265,893	0	19,265,893
2095	0	4,037,194	0	4,037,194
2096	0	19,443,741	0	19,443,741
2097	0	4,037,194	0	4,037,194
2098	0	18,761,384	0	18,761,384
2099	0	4,205,363	0	4,205,363
2100	0	26,232,857	0	26,232,857
2101	0	4,205,363	0	4,205,363
2102	0	4,205,363	0	4,205,363
2103	0	4,205,363	0	4,205,363
2104	0	5,274,387	0	5,274,387
2105	0	4,205,363	0	4,205,363
2106	0	4,205,363	0	4,205,363
2107	0	4,037,194	0	4,037,194
2108	0	4,215,042	0	4,215,042
2109	0	4,205,363	0	4,205,363
2110	0	4,037,194	0	4,037,194
2111	0	4,205,363	0	4,205,363
2112	0	4,215,042	0	4,215,042
2113	0	4,037,194	0	4,037,194
2114	0	4,205,363	0	4,205,363
2115	0	4,205,363	0	4,205,363
2116	0	4,046,872	0	4,046,872
2117	11,050,245	4,037,194	0	15,087,439
2118	1,471,425	0	822,778	2,294,203
	\$476,521,706	\$799,879,881	\$46,099,042	\$1,322,500,630

SCHEDULE OF TOTAL ANNUAL EXPENDITURES
Prairie Island Nuclear Generating Plant Unit 2

Year	Radiological	Spent Fuel	Site Restoration	Yearly Total
2034	\$9,569,898	\$3,438,926	\$54,987	\$13,063,811
2035	60,329,258	18,303,297	390,765	79,023,320
2036	109,834,268	10,762,920	1,832,518	122,429,706
2037	107,666,243	8,261,345	2,148,588	118,076,175
2038	91,781,503	6,026,510	1,894,535	99,702,549
2039	15,058,917	12,670,326	191,918	27,921,161
2040	9,199,725	6,545,128	61,502	15,806,355
2041	9,174,589	19,832,517	61,334	29,068,440
2042	9,174,589	6,527,245	61,334	15,763,168
2043	9,174,589	19,832,517	61,334	29,068,440
2044	9,199,725	6,545,128	61,502	15,806,355
2045	9,174,589	19,832,517	61,334	29,068,440
2046	9,174,589	6,527,245	61,334	15,763,168
2047	9,174,589	19,832,517	61,334	29,068,440
2048	9,199,725	6,545,128	61,502	15,806,355
2049	15,195,163	26,490,345	61,334	41,746,842
2050	38,137,300	5,413,492	61,334	43,612,125
2051	10,590,651	9,800,141	14,838,687	35,229,480
2052	41,182	14,164,702	22,978,923	37,184,808
2053	19,354	17,184,160	10,798,838	28,002,351
2054	0	19,907,200	0	19,907,200
2055	0	19,907,200	0	19,907,200
2056	0	15,264,526	0	15,264,526
2057	0	11,530,247	0	11,530,247
2058	0	11,530,247	0	11,530,247
2059	0	4,084,067	0	4,084,067
2060	0	15,264,526	0	15,264,526
2061	0	11,530,247	0	11,530,247
2062	0	15,253,337	0	15,253,337
2063	0	15,253,337	0	15,253,337
2064	0	4,095,256	0	4,095,256
2065	0	11,530,247	0	11,530,247
2066	0	4,084,067	0	4,084,067
2067	0	15,253,337	0	15,253,337
2068	0	11,541,436	0	11,541,436
2069	0	4,084,067	0	4,084,067
2070	0	15,253,337	0	15,253,337
2071	0	11,530,247	0	11,530,247
2072	0	4,095,256	0	4,095,256
2073	0	11,530,247	0	11,530,247
2074	0	16,480,852	0	16,480,852
2075	0	4,084,067	0	4,084,067
2076	0	11,541,436	0	11,541,436
2077	0	15,253,337	0	15,253,337
2078	0	4,084,067	0	4,084,067
2079	0	11,530,247	0	11,530,247
2080	0	11,541,436	0	11,541,436

SCHEDULE OF TOTAL ANNUAL EXPENDITURES
Prairie Island Nuclear Generating Plant Unit 2

Year	Radiological	Spent Fuel	Site Restoration	Yearly Total
2081	0	4,084,067	0	4,084,067
2082	0	7,807,157	0	7,807,157
2083	0	4,084,067	0	4,084,067
2084	0	4,095,256	0	4,095,256
2085	0	11,530,247	0	11,530,247
2086	0	26,422,607	0	26,422,607
2087	0	4,084,067	0	4,084,067
2088	0	18,987,616	0	18,987,616
2089	0	4,084,067	0	4,084,067
2090	0	11,530,247	0	11,530,247
2091	0	3,869,024	0	3,869,024
2092	0	19,107,402	0	19,107,402
2093	0	4,205,363	0	4,205,363
2094	0	19,265,893	0	19,265,893
2095	0	4,037,194	0	4,037,194
2096	0	19,443,741	0	19,443,741
2097	0	4,037,194	0	4,037,194
2098	0	18,761,384	0	18,761,384
2099	0	4,205,363	0	4,205,363
2100	0	26,232,857	0	26,232,857
2101	0	4,205,363	0	4,205,363
2102	0	4,205,363	0	4,205,363
2103	0	4,205,363	0	4,205,363
2104	0	5,274,387	0	5,274,387
2105	0	4,205,363	0	4,205,363
2106	0	4,205,363	0	4,205,363
2107	0	4,037,194	0	4,037,194
2108	0	4,215,042	0	4,215,042
2109	0	4,205,363	0	4,205,363
2110	0	4,037,194	0	4,037,194
2111	0	4,205,363	0	4,205,363
2112	0	4,215,042	0	4,215,042
2113	0	4,037,194	0	4,037,194
2114	0	4,205,363	0	4,205,363
2115	0	4,205,363	0	4,205,363
2116	0	4,046,872	0	4,046,872
2117	9,698,475	4,037,194	0	13,735,669
2118	1,471,425	0	642,016	2,113,441
	\$552,040,348	\$843,197,184	\$56,446,952	\$1,451,684,484

SCHEDULE OF TOTAL ANNUAL EXPENDITURES
Prairie Island Nuclear Generating Plant Unit 1

Year	Radiological	Spent Fuel	Site	Yearly Total
			Restoration	
2033	\$25,245,893	\$850,895	\$258,731	\$26,355,519
2034	77,617,361	3,925,760	1,060,150	82,603,271
2035	115,513,707	16,628,759	1,944,088	134,086,555
2036	91,518,687	13,332,026	2,058,613	106,909,326
2037	47,443,756	12,450,122	1,302,185	61,196,063
2038	4,921,672	2,238,460	61,334	7,221,467
2039	4,921,672	8,891,096	61,334	13,874,102
2040	4,935,157	2,244,593	61,502	7,241,251
2041	4,921,672	15,543,732	61,334	20,526,738
2042	4,921,672	2,238,460	61,334	7,221,467
2043	4,921,672	15,543,732	61,334	20,526,738
2044	4,935,157	2,244,593	61,502	7,241,251
2045	4,921,672	15,543,732	61,334	20,526,738
2046	4,921,672	2,238,460	61,334	7,221,467
2047	4,921,672	15,543,732	61,334	20,526,738
2048	4,935,157	2,244,593	61,502	7,241,251
2049	10,851,624	22,953,566	61,334	33,866,524
2050	32,935,330	5,413,492	61,334	38,410,156
2051	8,553,254	9,800,141	11,557,313	29,910,708
2052	96,312	13,193,141	17,890,012	31,179,465
2053	45,261	17,192,232	8,407,328	25,644,821
2054	0	19,909,683	0	19,909,683
2055	0	19,909,683	0	19,909,683
2056	0	15,262,758	0	15,262,758
2057	0	11,525,136	0	11,525,136
2058	0	11,525,136	0	11,525,136
2059	0	4,072,206	0	4,072,206
2060	0	15,262,758	0	15,262,758
2061	0	11,525,136	0	11,525,136
2062	0	15,251,601	0	15,251,601
2063	0	15,251,601	0	15,251,601
2064	0	4,083,363	0	4,083,363
2065	0	11,525,136	0	11,525,136
2066	0	4,072,206	0	4,072,206
2067	0	15,251,601	0	15,251,601
2068	0	11,536,293	0	11,536,293
2069	0	4,072,206	0	4,072,206
2070	0	15,251,601	0	15,251,601
2071	0	11,525,136	0	11,525,136
2072	0	4,083,363	0	4,083,363
2073	0	11,525,136	0	11,525,136
2074	0	15,251,601	0	15,251,601

SCHEDULE OF TOTAL ANNUAL EXPENDITURES
Prairie Island Nuclear Generating Plant Unit 1

Year	Radiological	Spent Fuel	Site	Yearly Total
			Restoration	
2075	0	5,299,721	0	5,299,721
2076	0	11,536,293	0	11,536,293
2077	0	15,251,601	0	15,251,601
2078	0	4,072,206	0	4,072,206
2079	0	11,525,136	0	11,525,136
2080	0	11,536,293	0	11,536,293
2081	0	4,072,206	0	4,072,206
2082	0	7,798,671	0	7,798,671
2083	0	4,072,206	0	4,072,206
2084	0	4,083,363	0	4,083,363
2085	0	11,525,136	0	11,525,136
2086	0	26,430,996	0	26,430,996
2087	0	4,072,206	0	4,072,206
2088	0	18,989,223	0	18,989,223
2089	0	4,072,206	0	4,072,206
2090	0	11,525,136	0	11,525,136
2091	0	4,072,206	0	4,072,206
2092	0	18,989,223	0	18,989,223
2093	0	4,072,206	0	4,072,206
2094	0	18,978,066	0	18,978,066
2095	0	4,072,206	0	4,072,206
2096	0	18,989,223	0	18,989,223
2097	0	4,072,206	0	4,072,206
2098	0	18,978,066	0	18,978,066
2099	0	4,072,206	0	4,072,206
2100	0	26,286,010	0	26,286,010
2101	0	4,072,206	0	4,072,206
2102	0	19,909,683	0	19,909,683
2103	0	19,909,683	0	19,909,683
2104	0	19,920,839	0	19,920,839
2105	0	19,909,683	0	19,909,683
2106	0	15,251,601	0	15,251,601
2107	0	11,525,136	0	11,525,136
2108	0	11,536,293	0	11,536,293
2109	0	4,072,206	0	4,072,206
2110	0	15,251,601	0	15,251,601
2111	0	11,525,136	0	11,525,136
2112	0	15,262,758	0	15,262,758
2113	0	15,251,601	0	15,251,601
2114	0	4,072,206	0	4,072,206
2115	0	12,752,651	0	12,752,651
2116	0	4,083,363	0	4,083,363

SCHEDULE OF TOTAL ANNUAL EXPENDITURES
Prairie Island Nuclear Generating Plant Unit 1

Year	Radiological	Spent Fuel	Site Restoration	Yearly Total
2117	0	15,251,601	0	15,251,601
2118	0	11,525,136	0	11,525,136
2119	0	4,072,206	0	4,072,206
2120	0	15,262,758	0	15,262,758
2121	0	11,525,136	0	11,525,136
2122	0	4,072,206	0	4,072,206
2123	0	11,525,136	0	11,525,136
2124	0	15,262,758	0	15,262,758
2125	0	4,072,206	0	4,072,206
2126	0	11,525,136	0	11,525,136
2127	0	15,251,601	0	15,251,601
2128	0	4,083,363	0	4,083,363
2129	0	11,525,136	0	11,525,136
2130	0	11,525,136	0	11,525,136
2131	0	4,072,206	0	4,072,206
2132	0	7,809,828	0	7,809,828
2133	0	4,072,206	0	4,072,206
2134	0	4,072,206	0	4,072,206
2135	0	11,525,136	0	11,525,136
2136	0	26,442,153	0	26,442,153
2137	0	4,072,206	0	4,072,206
2138	0	18,978,066	0	18,978,066
2139	0	4,072,206	0	4,072,206
2140	0	11,536,293	0	11,536,293
2141	0	4,072,206	0	4,072,206
2142	0	18,978,066	0	18,978,066
2143	0	4,072,206	0	4,072,206
2144	0	18,989,223	0	18,989,223
2145	0	4,072,206	0	4,072,206
2146	0	18,978,066	0	18,978,066
2147	0	4,072,206	0	4,072,206
2148	0	18,989,223	0	18,989,223
2149	0	4,072,206	0	4,072,206
2150	0	26,286,010	0	26,286,010
2151	0	4,072,206	0	4,072,206
2152	0	19,920,839	0	19,920,839
2153	0	19,909,683	0	19,909,683
2154	0	19,909,683	0	19,909,683
2155	0	21,137,198	0	21,137,198
2156	0	15,262,758	0	15,262,758
2157	0	11,525,136	0	11,525,136
2158	0	11,525,136	0	11,525,136

SCHEDULE OF TOTAL ANNUAL EXPENDITURES
Prairie Island Nuclear Generating Plant Unit 1

Year	Radiological	Spent Fuel	Site Restoration	Yearly Total
2159	0	4,072,206	0	4,072,206
2160	0	15,262,758	0	15,262,758
2161	0	11,525,136	0	11,525,136
2162	0	15,251,601	0	15,251,601
2163	0	15,251,601	0	15,251,601
2164	0	4,083,363	0	4,083,363
2165	0	11,525,136	0	11,525,136
2166	0	4,072,206	0	4,072,206
2167	0	15,251,601	0	15,251,601
2168	0	11,536,293	0	11,536,293
2169	0	4,072,206	0	4,072,206
2170	0	15,251,601	0	15,251,601
2171	0	11,525,136	0	11,525,136
2172	0	4,083,363	0	4,083,363
2173	0	11,525,136	0	11,525,136
2174	0	15,251,601	0	15,251,601
2175	0	4,072,206	0	4,072,206
2176	0	11,536,293	0	11,536,293
2177	0	15,251,601	0	15,251,601
2178	0	4,072,206	0	4,072,206
2179	0	11,525,136	0	11,525,136
2180	0	11,536,293	0	11,536,293
2181	0	4,072,206	0	4,072,206
2182	0	7,798,671	0	7,798,671
2183	0	4,072,206	0	4,072,206
2184	0	4,083,363	0	4,083,363
2185	0	11,525,136	0	11,525,136
2186	0	26,430,996	0	26,430,996
2187	0	4,072,206	0	4,072,206
2188	0	18,989,223	0	18,989,223
2189	0	4,072,206	0	4,072,206
2190	0	11,525,136	0	11,525,136
2191	0	3,869,024	0	3,869,024
2192	0	19,120,902	0	19,120,902
2193	0	4,205,363	0	4,205,363
2194	0	19,279,393	0	19,279,393
2195	0	5,264,709	0	5,264,709
2196	0	19,457,241	0	19,457,241
2197	0	4,037,194	0	4,037,194
2198	0	18,774,884	0	18,774,884
2199	0	4,205,363	0	4,205,363
2200	0	26,250,998	0	26,250,998

SCHEDULE OF TOTAL ANNUAL EXPENDITURES
Prairie Island Nuclear Generating Plant Unit 1

Year	Radiological	Spent Fuel	Site Restoration	Yearly Total
2201	0	4,205,363	0	4,205,363
2202	0	4,205,363	0	4,205,363
2203	0	4,205,363	0	4,205,363
2204	0	4,046,872	0	4,046,872
2205	0	4,205,363	0	4,205,363
2206	0	4,205,363	0	4,205,363
2207	0	4,037,194	0	4,037,194
2208	0	4,215,042	0	4,215,042
2209	0	4,205,363	0	4,205,363
2210	0	4,037,194	0	4,037,194
2211	0	4,205,363	0	4,205,363
2212	0	4,215,042	0	4,215,042
2213	0	4,037,194	0	4,037,194
2214	0	4,205,363	0	4,205,363
2215	0	4,205,363	0	4,205,363
2216	0	4,046,872	0	4,046,872
2217	11,050,246	4,037,194	0	15,087,440
2218	1,603,148	0	1,012,133	2,615,281
	\$476,653,431	\$1,938,817,806	\$46,288,397	\$2,461,759,634

SCHEDULE OF TOTAL ANNUAL EXPENDITURES
Prairie Island Nuclear Generating Plant Unit 2

Year	Radiological	Spent Fuel	Site Restoration	Yearly Total
2034	\$9,569,898	\$3,438,926	\$54,987	\$13,063,811
2035	60,329,258	18,303,297	390,765	79,023,320
2036	109,834,268	10,762,920	1,832,518	122,429,706
2037	107,666,243	8,261,345	2,148,588	118,076,175
2038	91,781,503	6,026,510	1,894,535	99,702,549
2039	15,058,917	12,670,326	191,918	27,921,161
2040	9,199,725	6,545,128	61,502	15,806,355
2041	9,174,589	19,832,517	61,334	29,068,440
2042	9,174,589	6,527,245	61,334	15,763,168
2043	9,174,589	19,832,517	61,334	29,068,440
2044	9,199,725	6,545,128	61,502	15,806,355
2045	9,174,589	19,832,517	61,334	29,068,440
2046	9,174,589	6,527,245	61,334	15,763,168
2047	9,174,589	19,832,517	61,334	29,068,440
2048	9,199,725	6,545,128	61,502	15,806,355
2049	15,195,163	26,490,345	61,334	41,746,842
2050	38,137,300	5,413,492	61,334	43,612,125
2051	10,590,651	9,800,141	14,838,687	35,229,480
2052	41,182	13,193,141	22,978,923	36,213,246
2053	19,354	17,192,232	10,798,838	28,010,423
2054	0	19,909,683	0	19,909,683
2055	0	19,909,683	0	19,909,683
2056	0	15,262,758	0	15,262,758
2057	0	11,525,136	0	11,525,136
2058	0	11,525,136	0	11,525,136
2059	0	4,072,206	0	4,072,206
2060	0	15,262,758	0	15,262,758
2061	0	11,525,136	0	11,525,136
2062	0	15,251,601	0	15,251,601
2063	0	15,251,601	0	15,251,601
2064	0	4,083,363	0	4,083,363
2065	0	11,525,136	0	11,525,136
2066	0	4,072,206	0	4,072,206
2067	0	15,251,601	0	15,251,601
2068	0	11,536,293	0	11,536,293
2069	0	4,072,206	0	4,072,206
2070	0	15,251,601	0	15,251,601
2071	0	11,525,136	0	11,525,136
2072	0	4,083,363	0	4,083,363
2073	0	11,525,136	0	11,525,136
2074	0	15,251,601	0	15,251,601
2075	0	5,299,721	0	5,299,721

SCHEDULE OF TOTAL ANNUAL EXPENDITURES
Prairie Island Nuclear Generating Plant Unit 2

Year	Radiological	Spent Fuel	Site Restoration	Yearly Total
2076	0	11,536,293	0	11,536,293
2077	0	15,251,601	0	15,251,601
2078	0	4,072,206	0	4,072,206
2079	0	11,525,136	0	11,525,136
2080	0	11,536,293	0	11,536,293
2081	0	4,072,206	0	4,072,206
2082	0	7,798,671	0	7,798,671
2083	0	4,072,206	0	4,072,206
2084	0	4,083,363	0	4,083,363
2085	0	11,525,136	0	11,525,136
2086	0	26,430,996	0	26,430,996
2087	0	4,072,206	0	4,072,206
2088	0	18,989,223	0	18,989,223
2089	0	4,072,206	0	4,072,206
2090	0	11,525,136	0	11,525,136
2091	0	4,072,206	0	4,072,206
2092	0	18,989,223	0	18,989,223
2093	0	4,072,206	0	4,072,206
2094	0	18,978,066	0	18,978,066
2095	0	4,072,206	0	4,072,206
2096	0	18,989,223	0	18,989,223
2097	0	4,072,206	0	4,072,206
2098	0	18,978,066	0	18,978,066
2099	0	4,072,206	0	4,072,206
2100	0	26,286,010	0	26,286,010
2101	0	4,072,206	0	4,072,206
2102	0	19,909,683	0	19,909,683
2103	0	19,909,683	0	19,909,683
2104	0	19,920,839	0	19,920,839
2105	0	19,909,683	0	19,909,683
2106	0	15,251,601	0	15,251,601
2107	0	11,525,136	0	11,525,136
2108	0	11,536,293	0	11,536,293
2109	0	4,072,206	0	4,072,206
2110	0	15,251,601	0	15,251,601
2111	0	11,525,136	0	11,525,136
2112	0	15,262,758	0	15,262,758
2113	0	15,251,601	0	15,251,601
2114	0	4,072,206	0	4,072,206
2115	0	12,752,651	0	12,752,651
2116	0	4,083,363	0	4,083,363
2117	0	15,251,601	0	15,251,601

SCHEDULE OF TOTAL ANNUAL EXPENDITURES
Prairie Island Nuclear Generating Plant Unit 2

Year	Radiological	Spent Fuel	Site Restoration	Yearly Total
2118	0	11,525,136	0	11,525,136
2119	0	4,072,206	0	4,072,206
2120	0	15,262,758	0	15,262,758
2121	0	11,525,136	0	11,525,136
2122	0	4,072,206	0	4,072,206
2123	0	11,525,136	0	11,525,136
2124	0	15,262,758	0	15,262,758
2125	0	4,072,206	0	4,072,206
2126	0	11,525,136	0	11,525,136
2127	0	15,251,601	0	15,251,601
2128	0	4,083,363	0	4,083,363
2129	0	11,525,136	0	11,525,136
2130	0	11,525,136	0	11,525,136
2131	0	4,072,206	0	4,072,206
2132	0	7,809,828	0	7,809,828
2133	0	4,072,206	0	4,072,206
2134	0	4,072,206	0	4,072,206
2135	0	11,525,136	0	11,525,136
2136	0	26,442,153	0	26,442,153
2137	0	4,072,206	0	4,072,206
2138	0	18,978,066	0	18,978,066
2139	0	4,072,206	0	4,072,206
2140	0	11,536,293	0	11,536,293
2141	0	4,072,206	0	4,072,206
2142	0	18,978,066	0	18,978,066
2143	0	4,072,206	0	4,072,206
2144	0	18,989,223	0	18,989,223
2145	0	4,072,206	0	4,072,206
2146	0	18,978,066	0	18,978,066
2147	0	4,072,206	0	4,072,206
2148	0	18,989,223	0	18,989,223
2149	0	4,072,206	0	4,072,206
2150	0	26,286,010	0	26,286,010
2151	0	4,072,206	0	4,072,206
2152	0	19,920,839	0	19,920,839
2153	0	19,909,683	0	19,909,683
2154	0	19,909,683	0	19,909,683
2155	0	21,137,198	0	21,137,198
2156	0	15,262,758	0	15,262,758
2157	0	11,525,136	0	11,525,136
2158	0	11,525,136	0	11,525,136
2159	0	4,072,206	0	4,072,206

SCHEDULE OF TOTAL ANNUAL EXPENDITURES
Prairie Island Nuclear Generating Plant Unit 2

Year	Radiological	Spent Fuel	Site Restoration	Yearly Total
2160	0	15,262,758	0	15,262,758
2161	0	11,525,136	0	11,525,136
2162	0	15,251,601	0	15,251,601
2163	0	15,251,601	0	15,251,601
2164	0	4,083,363	0	4,083,363
2165	0	11,525,136	0	11,525,136
2166	0	4,072,206	0	4,072,206
2167	0	15,251,601	0	15,251,601
2168	0	11,536,293	0	11,536,293
2169	0	4,072,206	0	4,072,206
2170	0	15,251,601	0	15,251,601
2171	0	11,525,136	0	11,525,136
2172	0	4,083,363	0	4,083,363
2173	0	11,525,136	0	11,525,136
2174	0	15,251,601	0	15,251,601
2175	0	4,072,206	0	4,072,206
2176	0	11,536,293	0	11,536,293
2177	0	15,251,601	0	15,251,601
2178	0	4,072,206	0	4,072,206
2179	0	11,525,136	0	11,525,136
2180	0	11,536,293	0	11,536,293
2181	0	4,072,206	0	4,072,206
2182	0	7,798,671	0	7,798,671
2183	0	4,072,206	0	4,072,206
2184	0	4,083,363	0	4,083,363
2185	0	11,525,136	0	11,525,136
2186	0	26,430,996	0	26,430,996
2187	0	4,072,206	0	4,072,206
2188	0	18,989,223	0	18,989,223
2189	0	4,072,206	0	4,072,206
2190	0	11,525,136	0	11,525,136
2191	0	3,869,024	0	3,869,024
2192	0	19,120,902	0	19,120,902
2193	0	4,205,363	0	4,205,363
2194	0	19,279,393	0	19,279,393
2195	0	5,264,709	0	5,264,709
2196	0	19,457,241	0	19,457,241
2197	0	4,037,194	0	4,037,194
2198	0	18,774,884	0	18,774,884
2199	0	4,205,363	0	4,205,363
2200	0	26,250,998	0	26,250,998
2201	0	4,205,363	0	4,205,363

SCHEDULE OF TOTAL ANNUAL EXPENDITURES
Prairie Island Nuclear Generating Plant Unit 2

Year	Radiological	Spent Fuel	Site Restoration	Yearly Total
2202	0	4,205,363	0	4,205,363
2203	0	4,205,363	0	4,205,363
2204	0	4,046,872	0	4,046,872
2205	0	4,205,363	0	4,205,363
2206	0	4,205,363	0	4,205,363
2207	0	4,037,194	0	4,037,194
2208	0	4,215,042	0	4,215,042
2209	0	4,205,363	0	4,205,363
2210	0	4,037,194	0	4,037,194
2211	0	4,205,363	0	4,205,363
2212	0	4,215,042	0	4,215,042
2213	0	4,037,194	0	4,037,194
2214	0	4,205,363	0	4,205,363
2215	0	4,205,363	0	4,205,363
2216	0	4,046,872	0	4,046,872
2217	9,698,475	4,037,194	0	13,735,669
2218	1,603,148	0	831,371	2,434,519
	\$552,172,072	\$1,982,135,109	\$56,636,306	\$2,590,943,487

The NRC minimum required funding amounts, based upon the new information from NUREG-1307, Revision 15, and the most recent statistics for comparison to the new cost estimates have been calculated. Under the NRC minimum calculation requirements, the Company must show that it will meet the minimum cost calculated under at least one of the two burial options allowed: Direct Burial and Blended Burial. Both of the NRC minimum calculations are less than our 2014 cost estimate for the 60-year scenario. The remaining part of the section contains the support schedules for the information reported below:

NRC Minimum Calculation Supporting Schedules

- B.1 NRC Minimum Historical Escalation
- B.2 NRC Minimum Calculation

January 1986 to June 2014

1. Determine Most Recent Escalation Component

	Base Conversion 1986	Value (2005 base)	2Q - 14 (Dec '05 Base)	Base Labor Adjustment Factor	Current Labor Adjustment Factor
	(1)	(2)	(3)	(4)	(5)
Labor (L)	48.1	100.00	119.5	2.08	2.48

Dept of Labor, Bureau of Labor Statistics, Monthly Labor Review, Aug 2014, Employment Cost Index, private industry, by region, Midwest

Industrial Power (P)	114.2			222.0	1.944
Light Fuel Oil (F)	82.0			296.5	3.616

Department of Labor, Bureau of Labor Statistics, Producer Price Index Data for June 2014; Industrial Power from Commodity code 0543, 500 kw demand, Midwest Region; Light Fuel Oils from Commodity code 0573

Burial (B)					
PWR - Blended					13.885
PWR - Direct					30.581
BWR - Blended					14.160
BWR - Direct					27.295

NUREG 1307, Report on Waste Burial, Revision 15 (Table 2.1 in January 2013)

2. Calculate Energy Component (E)

	Equation	Industrial Power	Light	Fuel Oil	Energy Component
Energy (PWR)	= .58(P) + .42(F)	1.944		3.616	2.646
Energy (BWR)	= .54(P) + .46(F)	1.944		3.616	2.713

3. Calculate NRC Escalation Factor as of June 2014

	Labor	Energy	Burial	NRC Escalation Factor
	(L)	(E)	(B)	(6)
PWR - Blended	2.484	2.646	13.885	5.0136
PWR - Direct	2.484	2.646	30.581	8.6867
BWR - Blended	2.484	2.713	14.160	5.0828
BWR - Direct	2.484	2.713	27.295	7.9725

Notes:

- (1) = Base values from NRC Proposed Guidelines
- (2) = Conversion factor to convert from 1986 base to 2005 base.
- (3) = The most recent published value:
- (4) = (3) / (1), Labor only
- (5) = (4) * (3) for Labor, Industrial Power, and Light Fuel Oil
- (6) = (.65 x L) + (.13 x E) + (.22 x B)

January 1986 to June 2014

1. NRC Minimum Calculation in 1986 Dollars

	Equation	MWt	1986 Minimum Calculation
Monticello (BWR)	= \$104 million + (0.009 * MWt)	1775	119,975,000
Prairie Island (PWR), per unit	= \$75 million + (0.0088 * MWt)	1677	89,757,600

2. NRC Minimum Calculation in 2014 Dollars - Blended Burial Option

	1986 Minimum Calculation	Escalation Rate	2014 Minimum Calculation (Blended)
Monticello (BWR)	119,975,000	5.0828	609,803,983
Prairie Island (PWR), per unit	89,757,600	5.0136	450,005,553

3. NRC Minimum Calculation in 2014 Dollars - Direct Burial Option

	1986 Minimum Calculation	Escalation Rate	2014 Minimum Calculation (Direct)
Monticello (BWR)	119,975,000	7.9725	956,495,740
Prairie Island (PWR), per unit	89,757,600	8.6867	779,695,989

Introduction

The escalation rate for decommissioning costs is an important element in determining the appropriate investment strategy, funding contributions, and the computation of the annual nuclear decommissioning external sinking fund accrual. This rate is used to inflate the 2014 decommissioning cost estimate out to the time that expenditures are predicted to occur. Since the decommissioning costs were provided by TLG in 2014 dollars (i.e., they are real costs), the escalation rate considers only the projected increases in costs from 2014 out to the estimated years of the final decommissioning expenditures. Long-range inflation and escalation assumptions provided by PGA are utilized.

Economic Forecast

The trend projection used for escalation is a baseline scenario based on a steady long-term real Gross Domestic Product (GDP) growth of 2.5 percent. The projection assumes that the economy suffers no major long-term mishaps, but grows smoothly, in the sense that actual output follows potential output relatively closely. This projection is best described as depicting the mean of all possible paths that the economy could follow in the absence of major long-term disruptions. Such disruptions include large oil price shocks, untoward and persistent swings in macroeconomic policy, or excessively rapid increases in demand. The trend projection can be considered an unbiased reflection of the future performance of the economy. The real GDP forecast of 2.5 percent is slightly below the 3.4 percent average since 1929 and the 3.2 percent average since World War II (WWII).

For the 60-Year Scenario, the 2014 decommissioning cost for Monticello and Prairie Island generating plants depict an overall expenditure period from 2033 to 2078 for the Prairie Island plant and from 2030 to 2091 for the Monticello plant. The expenditure pattern for this scenario requires the estimation of an escalation rate to 2091.

Inflation Factors

Inflation is the decrease in the purchasing power of money or the increase in the prices of goods and services. A general rate of inflation has little to no direct relationship in escalating a decommissioning cost estimate and is generally lower than more specific methods of estimation. Decommissioning is

a unique combination of functions with many operations that are not performed often in industry, and it may be more consistent to use a decommissioning-specific inflation factor.

PGA has refined the analysis surrounding the calculation of an appropriate escalation rate and believes its methodology provides an appropriate estimate of the escalation rate. TLG provides a detailed decommissioning cost estimate that is site specific for the units at Monticello and Prairie Island. These site-specific decommissioning cost components need only be linked with appropriate escalation.

PGA breaks escalation down into two components: inflation and non-inflation escalation. Non-inflation escalation reflects idiosyncratic costs for decommissioning nuclear power plants, above and beyond the escalation associated with inflation. During the period of active decommissioning, labor is the dominant cost.

The long-term escalation rates used in this analysis are as follows

Escalation Component	Trend Projection
Inflation	2.36%
Non-inflation escalation (Operations/Radiological)	2.00%
Total escalation (Operations/Radiological)	4.36%
Non-inflation escalation (ISFSI/Site Restoration)	1.00%
Total escalation (ISFSI/Site Restoration)	3.36%

Long-term expected inflation is assumed to be 2.36 percent, which is estimated from the expected inflation implied in long-term US treasury rates. The long-term risk-free (treasury) rate is observed to be 3.36 percent and the observed long-term Treasury Inflation Protected Securities (TIPS) yield (proxy for assuming the long-term real rate of interest) is 1.00 percent. This implies expected inflation of 2.36 percent.

Non-inflation escalation is assumed to be 2.00 percent until plant operations and radiological decommissioning activities are completed and then 1.00 percent for activities thereafter.

The overall escalation rates in the above table should be compared with the 3.63 percent escalation rate in the 2011 analysis and the approved escalation rate of 2.89 percent from the 2008 analysis.

Decommissioning Cost Breakdown and Escalation

PGA related the calculation of the escalation rate to the detailed cost categories provided by the site specific decommissioning cost analysis performed by TLG. The TLG cost estimates are divided into five components or categories: labor, materials and equipment, energy, burial, and other. PGA begins its forecast by separating inflation and other costs, and separating labor from the other four sources.

Inflation is the general increase in all prices across the economy. If all costs in every industry were analyzed, in aggregate they must increase by inflation. Therefore, an assumption of costs growing by more than inflation requires that other costs somewhere are growing less. We assume that the non-labor parts of the costs grow at one percent more than inflation. In general, this increase would constitute a conservative assumption. However, given regulatory uncertainty and the complexities of forecasting technical change, the assumption that other costs grow faster than inflation seems reasonable.

According to economic theory, labor costs increase by inflation plus productivity (merit). We have assumed merit increases are 1.4 percent per year, consistent with a 2.50 percent long-term real GDP growth and an assumption that labor productivity accounts for 56 percent of GDP growth. The labor productivity assumption is calculated by computing the average compensation to employees as a percentage of GDP income since 1947.

Approximately 50 percent of decommissioning costs are labor in the earlier years. Therefore, half (one percent of an assumed two percent) of non-inflation escalation comes from labor productivity increases and the other half comes from other non-labor factors. Once the ISFSI dominates the cost structure, the bulk of the expense is security and real estate taxes. It is unlikely that there will be significant productivity gains for security and the overall risk of non-inflation escalation should decline for this portion of the liability. Therefore, non-inflation escalation is reduced to one percent for this period.

Application of the Escalation Rate

A critical aspect of the valuation procedure is to ensure that assumptions are consistent between asset and liability growth. The analysis assumes that:

$$\text{Expected cost (liability) growth} = \text{inflation} + \text{non-inflation escalation}$$
$$\begin{aligned} \text{Expected pre-tax asset returns} = & \text{inflation} + \text{real interest rate} \\ & + \text{risk premium} \end{aligned}$$

Note that inflation increases both pre-tax asset returns and decommissioning costs (i.e., the liability) equally. Furthermore, in the absence of taxes, inflation would be neutral to the valuation, which is consistent with economic theory based on real liability cash flows. The introduction of taxes, however, changes the analysis somewhat. Taxation means that lower inflation helps improve funded status, as the reduction in liability escalation will exceed the reduction in the after-tax asset return.

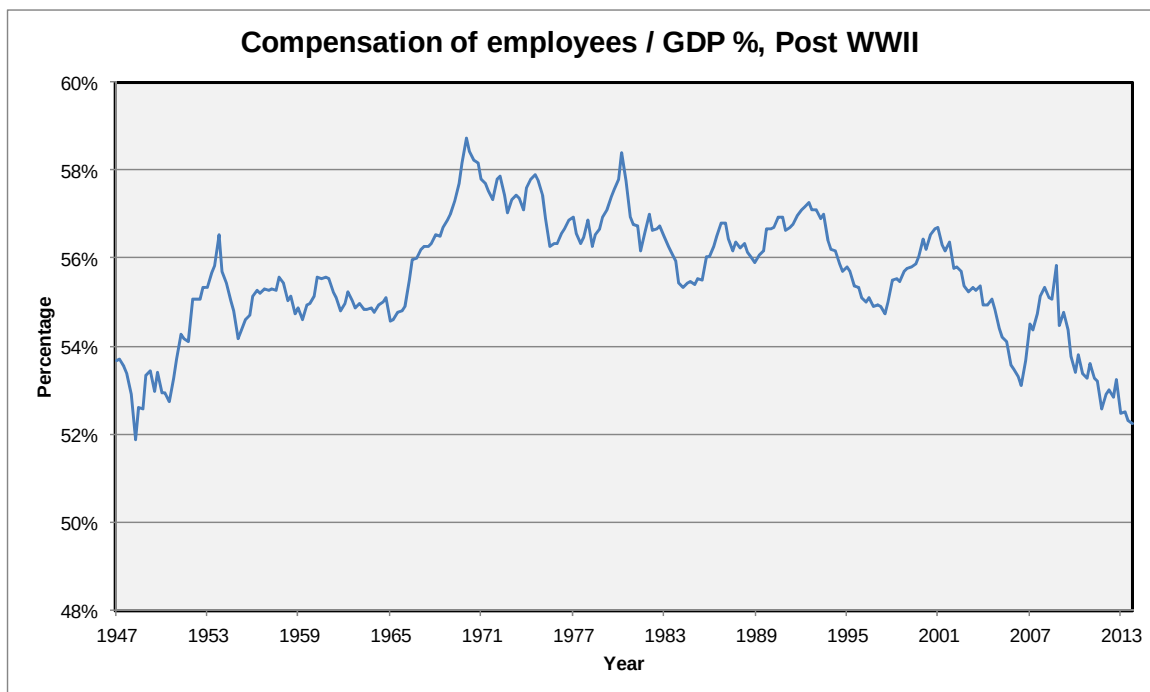
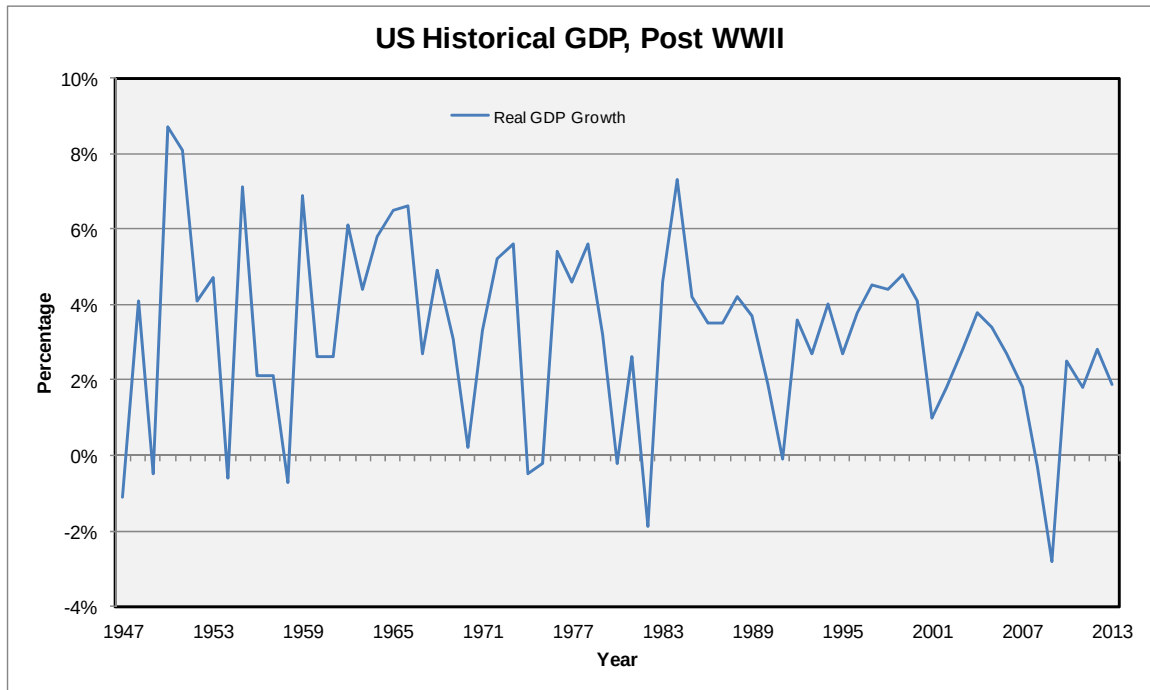
The other variables, however, have major implications for the analysis, since they are not offset in the same way as inflation. In general, the most important variables are non-inflation escalation, the real rate of interest, and the risk premium associated with the growth portfolio assets.

The escalation rate is likely the most volatile aspect of estimating the decommissioning cost recovery. However, a triennial review with revised economic forecasts will continually provide the opportunity to adjust for the long-term effects of inflation on an ongoing basis.

Historical Real GDP and Labor Productivity

In order to provide some context for the escalation assumptions presented above, below we present charts of historical real GDP and labor productivity for the US economy. Labor productivity is measured by PGA as employee compensation as a percentage of total GDP income.

Analysis indicates that the real GDP growth assumption of 2.5 percent is a reasonable long-term forecast and that labor has accounted for approximately 52-58 percent of GDP since WWII, and capital has earned approximately 42-48 percent.



Background

Per Commission Orders, beginning with Docket No. E002/D-86-604 and through subsequent dockets, the Company is required to review the financial parameters, the funding methodology, and cost estimate every three years. In between triennial filings, the Company submits an Informational Letter annually discussing fund performance.

Since the nuclear power plants deliver power across state lines, each state is responsible for its share of the plants' ownership/use, and as such, its share of decommissioning cost. Based upon the demand of Minnesota Retail customers, Xcel Energy estimates that Minnesota's usage of the plants is 74.3399 percent. However, the engineering reports and asset-liability analysis, which use the engineering reports, do not distinguish between jurisdictions. Likewise, the analyses referred to in this schedule are performed on a total plant basis, and the figures (assets, liabilities, funded status, and expected contributions) are allocated to Minnesota by multiplying figures by 74.3399 percent.

There are references in this schedule to both the total across all jurisdictions (Total Company) and the MN Jurisdiction for various figures. References to the MN jurisdiction generally correspond to the Total Company multiplied by 74.3399 percent.

Trustee

BNY Mellon is the trustee for Xcel Energy's external nuclear decommissioning funds, the Qualified Trust and Escrow Fund (together, the Funds). The primary duty of the trustee is the safe custody of its assets including handling the settlement of all purchases and sales, whether placed by the trustee or by an independent investment manager. The trustee has limited investment duties other than the responsibility for keeping cash balances temporarily invested. Other duties include paying income taxes on the earnings of the Qualified Trust (taxes on a non-qualified Escrow Fund are paid by Xcel Energy), paying invoices for services for the trust and investment managers, conducting investment performance reporting, and keeping accurate records of all of its activities with respect to the fund.

Investment managers

Xcel Energy has retained PGA to assist the Company in establishing investment policy for the Funds. Due to the regulatory approval of the life extension of the Monticello and Prairie Island nuclear generating plants, the Company asked PGA to assess whether changes were needed to reflect the extended time horizon and to achieve a better balance between long-term investment return and risk. Based on their evaluation, PGA recommended that the Funds be more diversified and the Company concurred. In 2009, the Funds were invested with three managers. In 2010, the list of investment managers was expanded to seven and covered six asset categories. In 2014, the list of investment managers was further expanded to eleven investment managers covering ten asset categories. As of September 2014, the asset managers and their mandates are:

1. First Principles Capital Management manages the domestic investment grade fixed income component of the qualified fund.
2. Parametric Portfolio Advisors, a subsidiary of Eaton Vance Investment Managers, manages the assets of the U.S. equity and non-U.S. developed market equity components of the Qualified Trust. Parametric also utilizes tax-efficient strategies with respect to the whole trust.
3. Eaton Vance Investment Managers manages the assets of the emerging markets equity component of the Qualified Trust.
4. Shenkman Capital Management manages the assets of the high yield fixed income component of the Qualified Trust.
5. Wellington Management Company manages the assets of the emerging markets fixed income component of the Qualified Trust.
6. – 7. Titan Advisors and Magnitude Capital manage the assets of the hedge funds component of the Qualified Trust.
8. The Townsend Group manages the assets of the real estate component of the Qualified Trust.
9. StepStone Group manages the assets of the private equity component of the Qualified Trust.
10. Gresham Investment Management manages the assets of the commodities component of the qualified fund. CoreCommodity has also recently been approved by the NDT Committee to manage the commodities component of the Qualified Trust. This new manager is expected to be funded in first quarter 2015.

11. Delaware Investment Advisors manages the assets of the non-qualified Escrow Fund, in a municipal bond portfolio mandate. Until January 2, 2013, those assets were managed by PGA.

Although the trusts are not subject to the Employee Retirement Income Security Act (ERISA), the company has decided to use fiduciary standards similar to those imposed by ERISA for the management of the Trusts. A fiduciary as defined by the ERISA is any person who:

1. Exercises any discretionary control over the management of a plan or the management or disposition of its assets;
2. Renders investment advice for a fee with respect to the funds or property of a plan or has the authority to do so; or
3. Has any discretionary authority or responsibility in the administration of a plan.

Although Xcel Energy has established the general guidelines in the investment advisory contracts, the Company does not direct the purchase of individual investments. The investment managers, however, being fiduciaries to the fund, must act in the best interests of the fund.

Investment diversification

PGA performed a detailed asset-liability analysis for the Company's Qualified Trust and Escrow Fund as part of this nuclear decommissioning filing. This analysis included an examination of the cash flows required for decommissioning as well as key assumptions about inflation, decommissioning cost, non-inflation escalation, real rates of return, and traditional asset assumptions.

PGA's analysis of risk premiums¹ resulted in lower forward looking risk premiums being assumed in 2014 relative to the 2011 analysis. This in turn reduced the 2014 expected returns. Lower risk premiums are accompanied by lower volatility assumptions, leaving risk-adjusted returns roughly the same. Lower risk and lower expected returns in 2014 required either a higher risk portfolio which will yield a higher expected return, or greater contributions to fully fund the plans. The

¹ Since investors can purchase effectively risk-free assets, the risk premium represents an expected return above the risk free rate as compensation for the risk.

Company has preferred a higher risk/higher expected return portfolio with a higher weighting to equities.

Overall, the Funds have been set up in order to take advantage of the reduced risk from asset diversification and to optimize risk-adjusted after-tax returns for a portfolio sufficient to fully fund the plans. Therefore, the investment strategy includes U.S. equities, non-U.S. equities, bonds, and alternative assets including real estate, commodities, private equity, and hedge funds.

Earnings evaluation

To review investment performance there are two basic comparisons to be made:

1. Performance of similar investments over time; and
2. Comparison of market value to the original cost (book value).

When making these comparisons, the current market value of the fund less an allowance for deferred taxes is used because it represents the value of the securities if they were sold today. For accounting purposes, Xcel Energy records the actual purchase price of the investments. Quarterly, a market value adjustment journal entry is made to book any unrealized gains or losses to special regulatory accounts per SFAS No. 115, *Accounting for Certain Investments in Debt and Equity Securities* (ASC 320 *Investments-Debt and Equity Securities*). The difference between market and book values represents the unrealized gains or losses. In addition it should be noted that trustee fees, investment management fees, and income taxes also are paid from these funds, thereby impacting overall fund performance.

The trustee statements for the qualified fund are a part of Schedule E and the trustee statements for the escrow fund are a part of Schedule F and show the current holdings for each respective fund by operating unit and fund manager.

Historical Fund Earnings

The time weighted annual return for the qualified trust fund is 5.0 percent² for the period March 15, 1991 through June 30, 2014. As of June 30, 2014, the combined Qualified Trust has an unrealized gain of approximately \$256 million for Total Company.

² Pre-tax, gross of fee return

Year-to-year returns can fluctuate significantly and these funds are long-term in nature. For example, the qualified fund earned the following returns over time:

Year	Earned Return*
1993	10.4%
1994	(4.1)
1995	12.7
1996	3.0
1997	7.2
1998	6.2
1999	(3.2)
2000	10.1
2001	5.5
2002	10.0
2003	2.9
2004	3.2
2005	1.4
2006	6.2
2007	3.6
2008	(22.9)
2009	20.9
2010	11.9
2011	0.2
2012	12.6
2013	11.4
2014 YTD**	6.2

* Pre-tax, gross of fee return

** Through June 30th

Yearly returns reflect short-term factors, but the focus of the investments is to achieve long-term returns and not the year-by-year results. Schedule E shows the annual activity from 2011 through June 30, 2014 of the Qualified Trust. Consistent with IRS rules, the investments to the qualified fund are by unit, thus earnings are shown separated by unit. On a monthly basis, BNY Mellon prorates the Qualified Trust balance for each unit to each jurisdiction. Schedule F shows the activity of the Escrow Fund from 2011 through June 30, 2014. The Escrow Fund assets are managed as one fund in order to reduce overall costs of management and thus

increase long-term returns. BNY Mellon then allocates the total Escrow Fund balance to individual operating unit accounts for each jurisdiction.

Benchmark Portfolio Performance³

In the past several years, the asset allocation has expanded from three investment managers to a broadly diversified portfolio. Throughout this period, Xcel Energy and PGA have benchmarked performance of the total combined trusts to a dynamic weight of the underlying investment's benchmarks. In 2013, the Qualified Trust returned 11.4 percent compared to the benchmark return of 10.2 percent. The Escrow Fund returned -3.2 percent in 2013, compared to the benchmark return of -2.6 percent. Overall, the total combined trusts returned 10.1 percent compared to the dynamic benchmark return of 9.4 percent in 2013.

In addition, we have created a target benchmark, which is composed of static weights of the underlying asset classes according to the target asset allocation, as opposed to the dynamic weights which have been used to date. In 2013, the total of the funds (including the Escrow Fund) returned 10.1 percent compared to the target benchmark return of 9.8 percent. It is important to note that the asset allocation has not yet reached the target allocation, so there will continue to be some deviation from this benchmark. However, the magnitude of this deviation is expected to decline as the target allocation is reached.

As of June 30, 2014, the current allocation vs. current target was as follows:

³ Investment returns listed in this section are pre-tax and gross of fee

Asset Class	6/30/14 allocation	Target allocation
Growth Portfolio		
Equities		
US equity large cap	19.8%	13.7%
US equity small cap	1.8%	4.1%
Non-US large cap	12.0%	10.0%
Emerging Markets	5.1%	5.0%
Total Equities	38.7%	32.9%
Fixed income		
Investment grade/municipal	17.9%	17.1%
High yield	6.1%	5.0%
EM debt	5.0%	5.0%
Cash	0.3%	0.0%
Total Fixed income	29.4%	27.1%
Alternatives		
Hedge funds	9.7%	10.0%
Real estate	9.8%	10.0%
Private equity	4.7%	10.0%
Commodities	7.6%	10.0%
Total Alternatives	31.9%	40.0%
Total Portfolio	100.0%	100.0%

With respect to the table above, the equity overweight relative to the target benchmark is temporary and will eventually be reduced to fund private equity capital calls over time. The Escrow Fund, which represents nine percent of the total as of June 30, 2014, was converted from cash and short term bonds managed by PGA to municipal bonds managed by Delaware Investment Advisors, whose mandate began on January 2, 2013.

Analytical Method

The three objectives are to determine recommendations for the following:

1. Investment strategy, i.e., the composition of the investment portfolio.
2. Contributions strategy, i.e., the annual annuity payment amount required to fund the decommissioning costs.
3. Escrow strategy, i.e., the decision about whether to pour-over escrow assets into the qualified trust and potentially to invest escrow assets with a longer term focus.

This method uses PGA's process, whose goal is to project decommissioning costs (liabilities) and investments (assets) to address the above objectives.

First, the projected decommissioning costs are captured, along with the uncertain escalation of these costs through time in order to determine the value of the liability. The valuation of the liability involves the following steps:

- i. obtaining the current decommissioning costs from TLG in real dollars;
- ii. escalation of the real decommissioning cash flows to account for realized and expected future inflation and non-inflation escalation; and
- iii. calculation of the present value of the escalated cash flows back to the valuation date, using the expected return on assets as the discount rate. For this analysis, the valuation date is June 30, 2014.

Second, the assets (investments) are captured, which include:

- i. the Escrow Fund;
- ii. the Qualified Trust; and
- iii. a pour-over rule for moving funds from the Escrow Fund to the Qualified Trust.

This includes an analysis of the expected evolution of the assets and liabilities, along with a stochastic analysis of the risks involved.

Method – Determining Investment Strategy

In light of the benefits of the Energy Policy Act of 1992 for nuclear decommissioning trust investment management, the Company has established a nuclear decommissioning investment policy with the goal to maximize after-tax portfolio returns and minimize aggregate portfolio risk for external fund investing. This policy was approved in the 1993 filing. Accomplishing this goal requires finding the combination of assets that optimizes the after-tax risk/return characteristics of the fund which leads to full funding in the expected case without an increase in contributions.

PGA was engaged by the Company to recommend an appropriate investment strategy for trust assets intended for the eventual decommissioning of the Prairie Island and Monticello nuclear generating plants.

This process is called asset allocation optimization. Different mixes of assets can produce hundreds, or even thousands, of alternative combinations of risk and returns. As a result, asset allocation techniques have been developed to evaluate the various possible asset mixes and determine those combinations that are likely to deliver optimal performance in terms of risk and return.

This process has been used to perform a long-term optimization of the asset allocation for the Company's investments. In any investment there is always a trade-off between risk and the rate of return on that investment. Typically, strategies with high expected returns also come with high risk and vice versa. The goal is to optimize the trade-off between risk and return over the long term. If on the one hand too little risk is taken, then there is a significant chance that the trust remains underfunded, necessitating very large contributions into the trust in later years. If on the other hand too much risk is taken, there is a risk of significant underfunding of the trust in the future, or of significant overfunding of the trust, which because of the difficulty of removing assets from the Qualified Trust is also highly undesirable and value destroying.

Method – Determining Contributions

Contributions are calculated in terms of the annual annuity payment amounts required to fund the difference between liabilities (the present value of decommissioning cash flows) and the projected asset level at the start of decommissioning.

The projected asset level in the future is calculated by applying the expected asset returns at any point in time to the pool of assets.

In the analysis, the liabilities are calculated as the present value of all the decommissioning costs. The present value is calculated in a two-stage process by:

1. Escalating the real decommissioning cash flows by the escalation factors discussed in Schedule C.
2. Discounting the escalated cash flows using the expected return on the asset portfolio.

As a result, the present value of the liabilities will depend on the escalation of the decommissioning costs and the expected return of the chosen investment portfolio. Because inflation impacts both the escalation of cash flows and the pre-tax discount rate, it only has a small impact on the value of the liabilities from the tax effects of changed inflation assumptions.

A measure of the degree to which assets will be able to meet the decommissioning cost liabilities is the funded status which is the ratio of the value of assets to the value of liabilities, expressed as a percentage.

Assumptions – Overview

The assumption set that goes into the process involves three different types of assumptions which are developed in a consistent manner:

- *Investment assumptions.* These include long-term expected returns, volatilities (standard deviations of returns) and correlations for different types of assets.
- *Other economic assumptions.* These include assumptions for long-term inflation rate and the long-term escalation of decommissioning costs.
- *Tax assumptions.* These include assumptions for state and federal tax rates and deductibility.

Investment and Economic Assumptions

The development of consistent investment assumptions goes hand-in-hand with the development of other economic assumptions about inflation, interest rates, GDP growth, etc.

The return assumptions for each type of asset represent expected market returns for that asset class on a forward-looking basis. The assumptions reflect a blend of rigorous analysis of historical performance and the forward looking views of the financial markets, as revealed through the yields on long term bonds, the price-earnings ratios of the major stock market indices, implied inflation expectations in TIPS, etc.

This methodology will produce more conservative expected rates of return than an analysis that looks simply at historical averages. The important distinction is that,

in using this methodology, the asset return is tied to the inflation rate, so at lower inflation rates investors require lower rates of return. Current markets indicate much lower expected inflation over even long-term horizons than historical averages.

The inflation rate used for expected returns is matched to the inflation rate used for liability growth, enforcing the consistency of asset and liability assumptions.

Expected asset returns (on a pre-tax basis) are developed via a building-block approach that starts with the expected long-term real interest rate and expected long-term inflation. Together these two define the expected long-term nominal risk-free interest rate. Expected returns for different assets are then determined by adding appropriate risk premiums to this. In other words, we have the following relationship:

$$\begin{aligned} \text{Expected pre-tax asset return} &= \text{inflation} + \text{real interest rate} \\ &+ \text{risk premium} \end{aligned}$$

The next step in the assumption setting process involves an analysis of historical risks and correlations of asset class returns to which subjective judgment is applied. The result of this analysis is incorporated into a risk matrix from which expected long-term risk premiums are estimated for each asset class.

The long-term nominal return expectations are then determined by combining the asset class risk premiums with expected inflation and real risk-free rate assumptions. As a final consideration, the nominal return assumptions are blended with current market conditions to develop long-term equilibrium expectations. The return and risk expectations for each asset class incorporate assumptions about historical return relationships, current financial market conditions and the degree of global capital market integration.

The assumptions pertaining to the volatility of investment returns are based on observed experience and calculated in terms of the standard deviation of historical asset returns.

The following table shows the expected return and volatility assumption inputs:

Long-term Investment Assumptions for 2014 – Qualified Trust

Asset class	Expected returns,			Volatility of returns, after tax, fees, and alpha
	before tax, fees, and alpha (arithmetic)	Expected returns, after tax, fees, and alpha (arithmetic)	Expected returns, after tax, fees, and alpha (geometric)	
Cash	3.36%	2.32%	2.32%	0.36%
Equities	--	--	--	--
US equity - Large cap	9.12%	6.49%	5.96%	10.64%
US equity - Small cap	10.89%	7.77%	6.83%	14.25%
Non-US equity - EAFE	10.83%	7.73%	6.92%	13.17%
Non-US equity - Emerging Markets	13.14%	10.17%	8.78%	17.50%
Fixed income	--	--	--	--
Fixed income - High yield	8.32%	6.00%	5.60%	9.23%
Fixed income - Emerging Markets debt	7.99%	6.19%	5.83%	8.85%
Investment grade – Credit + TIPS	4.39%	3.76%	3.55%	6.56%
Investment grade – Intermediate Municipal	3.64%	3.28%	3.14%	5.43%
Alternatives	--	--	--	--
Alternatives - Hedge fund of funds	6.01%	4.70%	4.59%	4.75%
Alternatives - Private equity	13.27%	10.48%	9.28%	16.28%
Alternatives – Real assets – Real estate	6.99%	4.68%	4.32%	8.73%
Alternatives – Real assets – other	8.46%	6.39%	5.55%	13.43%

Note: “Alpha” refers to the incremental investment returns generated by investment managers; “fees” refers to investment manager fees; “tax” refers to state and federal taxes.

These expected return assumptions are based on an assumed long-term risk-free rate of 3.36 percent, consisting of a 1.00 percent real asset return and expected inflation of 2.36 percent.

The correlations between the investment returns of different asset classes are important characteristics, in addition to the expected returns and the volatility of returns. Recent and long-term histories are used as a guide to setting these parameters. The table below shows the correlations between asset returns used in the analysis.

Long-Term Investment Return Correlations for 2014

	Cash	US equity - Large cap	US equity - Small cap	Non-US equity - EAFE	Non-US equity - Emerging Markets	Fixed income - High yield	Fixed income - Emerging Markets debt	Investment grade - Credit + TIPS	Investment grade - Intermediate Municipal	Alternatives - Hedge fund of funds	Alternatives - Private equity	Alternatives - Real assets - Real estate	Alternatives - Real assets - other
Cash	1.00												
US equity - Large cap	-0.06	1.00											
US equity - Small cap	-0.08	0.92	1.00										
Non-US equity - EAFE	0.01	0.89	0.81	1.00									
Non-US equity - Emerging Markets	0.07	0.80	0.76	0.89	1.00								
Fixed income - High yield	-0.10	0.71	0.69	0.73	0.70	1.00							
Fixed income - Emerging Markets debt	-0.04	0.55	0.48	0.64	0.66	0.75	1.00						
Investment grade - Credit + TIPS	-0.06	0.21	0.14	0.30	0.33	0.49	0.69	1.00					
Investment grade - Intermediate Municipal	-0.04	0.04	-0.02	0.06	0.07	0.30	0.48	0.51	1.00				
Alternatives - Hedge fund of funds	0.11	0.67	0.62	0.76	0.80	0.50	0.41	0.19	0.03	1.00			
Alternatives - Private equity	-0.12	0.90	0.95	0.81	0.76	0.67	0.44	0.14	-0.02	0.69	1.00		
Alternatives - Real assets - Real estate	-0.02	0.35	0.39	0.32	0.27	0.38	0.31	0.19	0.11	0.14	0.35	1.00	
Alternatives - Real assets - other	0.07	0.49	0.42	0.60	0.64	0.38	0.41	0.27	-0.08	0.63	0.43	0.13	1.00

Taxation Assumptions

The taxation assumptions, along with the investment and other economic assumptions are important inputs for both the asset allocation portion, and the overall analysis performed. The following table shows the applicable tax rates for the Qualified Trust and Escrow Fund.

Municipal bonds are assumed to be free of federal taxes. Therefore, only state taxes are imposed. In practice, some municipal bonds will be exempt from state taxes also, specifically municipal bonds issued by Minnesota, but these are assumed to be a small percentage of the portfolio.

Treasury bonds are exempt from state taxes. Therefore, treasuries are taxed only at the federal rate and not at the state tax rate.

The Company's view is that US stocks in the Qualified Trust do not earn a dividends' received deduction, therefore stock returns are assumed to be fully taxed.

Tax Element	Tax Rate
Federal tax rate for the qualified trust	20%
Federal tax rate for the escrow account	35%
State tax on both the qualified trust and escrow account <i>Note: State taxes are deductible from federal taxes.</i>	9.8%

As a result, the total tax rates are (assuming that investments are fully taxed – this is modified for municipal bonds and treasuries):

Portfolio	Composite Tax Rate
Qualified Trust	27.84%*
Escrow Fund	41.37%**

*Calculation: $20\% + 9.8\% (1-20\%)$

**Calculation: $35\% + 9.8\% (1-35\%)$

These tax assumptions are incorporated into the after-tax expected returns in the table of investment assumptions above.

Results – Investment Strategy

The updated investment strategy is based on a particular application of what is called the “Two-Fund Separation Theorem” in portfolio theory. In the context of identifying an optimal investment strategy for the decommissioning assets, the Two-Fund Separation Theorem can be interpreted as stating that every portfolio on the efficient frontier can be constructed from a combination of the most efficient risk-seeking assets (Growth Portfolio) and an efficient low-risk portfolio.

As a result of applying the Two-Fund Separation Theorem and running PGA's portfolio optimization methodology, the updated investment strategy involves a mix between a portfolio invested in growth assets and a portfolio invested in bonds. The mix is determined by the following rule:

Six years prior to each decommissioning cash flow, the portion of the growth assets that are required to make that payment is reallocated into bonds.

This strategy is efficient from an asset-liability management perspective in order to reduce the risk that market volatility significantly reduces the value of this portion of the assets just when they are needed to make payments.

A period of six years is needed for assets to earn their long-term rate of return with some degree of confidence. As discussed above, year to year variation can be very large for high returning assets, and six years, the time between two long economic cycles, is needed to justify long-term assumptions. Therefore, as decommissioning payments come due at less than six years, the assumption is that the funds are switched to bonds.

The 2011 analysis assumed a reallocation to bonds seven years before each cash flow. In 2014, this assumption was changed to six years. PGA's analysis and considerable literature justifies that over periods more than 10 years, the growth portfolio is optimal. For period of five years or less, less than a full business cycle, fixed income is optimal. The analysis shows that distinguishing a specific time frame within five to ten years is difficult as any period in that range has the same approximate risk-return trade-off. The lower risk premiums and risk associated with the 2014 assumptions relative to the 2011 assumptions allows a shortening of the period without greater all-around risk. Therefore, a switch to six years was used.

Note that the portion of the portfolio assigned to growth assets changes over time based on how large expected decommissioning payments will be over the next six years. The updated target asset allocation for the growth assets are shown in the table below:

Composition of the Growth Portfolio

Asset Class	Weight	Benchmark
Cash	0.00%	Federal Funds rate (effective)
<u>Equities</u>		
US Equities – Large Cap	21.00%	Russell 1000*
US Equities – Small Cap	2.00%	Russell 2000*
Non-US Equities – EAFE	19.00%	MSCI EAFE ND
Non-US Equities – Emerging Markets	10.00%	MSCI EM ND
<u>Fixed Income</u>		
Fixed Income – High Yield	5.00%	BofA/ML High Yield Master II
Fixed Income – Emerging Markets Debt	5.00%	JPMorgan EMBI GD
Investment Grade – Credit + TIPS	5.00%	Custom US corporate and inflation benchmark
Investment Grade – Intermediate Municipal	0.00%	Barclays Municipal Bond Index
<u>Alternatives</u>		
Alternatives – Hedge Fund of Funds	7.00%	HFRI Fund of Funds Index
Alternatives – Private Equity	10.00%	Custom Cambridge Private Equity Index
Alternatives – Real Assets – Real Estate	9.00%	NCREIF ODCE Index
Alternatives – Real Assets - Other	7.00%	Bloomberg Commodity Index

*Component of Russell 3000

Potential Growth Portfolios are the portfolios of assets that earn an expected rate of return with the lowest risk and the actual choice of the growth portfolio is based on setting the level of risk or return desired. Please note even the Growth Portion of the portfolio includes some bonds to provide diversification and efficiency. The ‘Growth Portion’ is not the same as the investment in equities.

In order to summarize expected investment returns and the volatility of returns, we make the following assumptions regarding the escrow account:

- *Escrow Fund association.* The assets in the escrow account are associated with each trust in such a way to make the initial funded status of each trust as close as possible, as of the valuation date. It is important to note that as assets and liabilities (and therefore funded status) for each plant changes, the allocation of the escrow assets amongst the plants in order to follow this same logic may change as well.
- *Pour-over base case assumption.* In conjunction with analysis conducted by PGA, the Company has estimated that the probability of the plants becoming fully funded by the time of decommissioning without the use of the Escrow Fund is very small. The Escrow Fund has a tax structure that is inefficient relative to the Qualified Trust. As such, the base-case assumption in the analysis is that the Escrow Funds is

poured into the associated Qualified Trust in 2016, and then ceases to exist thereafter.

- *Escrow Fund base-case investment assumption.* Up until 2016, assume the Escrow Fund is invested in municipal bonds, similar to the asset allocation that is in place as of the analysis date.

The overall expected portfolio returns and volatilities for each plant's nuclear decommissioning fund (Qualified Trust and Escrow Fund investments combined) are given in the table below:

Expected Returns and Volatilities for the Updated Strategy

Nuclear Plant	Average Expected Investment Return*	Average Volatility of Returns
Monticello		
Pre-decommissioning start	6.20%	8.91%
Post-decommissioning start	5.51%	7.88%
Prairie Island Unit 1		
Pre-decommissioning start	6.24%	9.01%
Post-decommissioning start	5.35%	7.74%
Prairie Island Unit 2		
Pre-decommissioning start	6.30%	9.13%
Post-decommissioning start	5.23%	7.67%

*Returns in this table are geometric returns.

Rates of Return

To arrive at the rates of return listed in the table above, the analysis uses different rates of return for escrow assets, bonds and the qualified trust Growth Portfolio; and the weights assigned to these portfolios change through time (the escrow is poured over in 2016, sufficient funds are switched to bonds within six years of a cash outflow to fund that outflow). Therefore, actual combined rates of return vary through time; the rates included are Single Effective Rates, which are weighted average rates. This rate leads to the same final funding level if applied to each of these components that would be obtained by using the actual rates.

Results – Escrow Fund Strategy

The above analysis assumed a base-case Escrow Fund strategy in which Escrow Fund is poured over to the Qualified Trust in 2016, and then the Escrow Fund ceases to exist thereafter.

This assumption was made based on PGA's estimate of the probability that the trusts become fully funded by the time of decommissioning, without the utilization of the Escrow Fund (i.e., assets that are currently in the Qualified Trust, combined with contributions, grow enough to satisfy the liability at decommissioning). For this analysis, PGA fixed contributions at current levels and assigned the Qualified Trust the updated target asset allocation listed above. Furthermore, PGA assumed asset returns are normally distributed and asset values are lognormal. For Monticello (most relevant because it is the most underfunded and therefore would be the trust that would need the Escrow Fund assets), PGA has estimated the probability of becoming fully funded without the Escrow Fund assets is approximately 15 percent.

The benefit of immediate pour-over of the Escrow Fund into the Qualified Trust is that the Federal tax rate on Qualified Trust is 20 percent, lower than the 35 percent tax rate for the Escrow Fund. However, because these assets become trapped in the Qualified Trust, a cost of illiquidity should be imposed for assets held in the Qualified Trust in excess of likely decommissioning needs. Therefore, a stochastic analysis can determine the best point at which the tax benefits and the potential for trapped cash are equivalent.

The optimal pour-over funded status trades off the tax benefits of the Qualified Trust with the potential for the Qualified Trust having trapped surplus. Therefore, the lower the funded status, the more likely pour-over will be optimal since trapped surplus is less likely.

To determine the optimal pour-over funded status, PGA performs a stochastic analysis at given pour-over levels. A cost is assigned to trapped surplus based on PGA's estimate of the cost of illiquid assets in the market since 'trapped' surplus is economically equivalent to assets owned that are illiquid. The analysis inputs a pour-over level; in each case, in each year in the analysis, the analysis pours over if the funded status is below that level. For a given pour-over level, the optimal

portfolio is established and used to determine net funding cost⁴ versus net fund cost at risk⁵ is determined. PGA then repeats this procedure for many different pour-over levels, resulting in a matrix of pour-over levels, optimal portfolios, and Net Funding Cost versus Net Funding Cost at Risk totals. The optimal pour-over level is the pour-over level with the lowest net funding cost vs. net funding cost at risk with its optimal portfolio.

After performing this analysis, the true optimum is obtained with a 90 percent pour-over target, meaning the best answer is to pour-over if the funded status is 90 percent or below. It is important to remember that many assumptions have to be made for this type of complex process, and therefore results should be interpreted carefully; nonetheless it does remain the optimal solution available even given any process limitations.

To further illustrate the benefits of immediately pouring over the Escrow Fund into the Qualified Trust, PGA conducted an additional analysis to quantify the cost of the Escrow Fund, as a result of its higher tax rate relative to the Qualified Trust. Using the updated asset allocation listed above, the estimated cost of holding the asset allocation in the Escrow Fund versus the Qualified Trust until decommissioning for the MN Jurisdiction is approximately \$6 million in lost earnings per year, translating into an increased required contribution of approximately \$4 million per year.

Conclusion

The analysis presented herein addresses the decisions relating to investment strategy, contribution strategy and escrow strategy.

In terms of investment strategy, PGA's analysis has led to a recommended asset allocation for the growth portion of the assets that involves equities, fixed income and alternative assets. Furthermore, the portion of the assets required to meet each decommissioning payment is switched from growth assets into bonds six years prior to that payment.

⁴ Net funding cost is the present value of contributions less the value of surplus after the illiquidity premium

⁵ Net funding cost at risk is the additional cost of the lowest five percent of outcomes

The net result is expected after-tax returns of 6.20 percent to 6.30 percent for the funds for the three nuclear plants prior to the start of decommissioning and 5.23 percent to 5.51 percent after the start of decommissioning.

In terms of Escrow Fund strategy, the analysis shows that the optimal “pour-over” point for transferring assets from the Escrow Fund and into the Qualified Trust corresponds to a funded status of 90 percent or below. With the funded status for each units ranging from 67 percent for Monticello to 87 percent for Prairie Island 1, it is optimal to pour-over the Escrow Fund to the Qualified Trust.

Schedule E contains the documents required by the Commission to be filed with every submittal, the activity for the Qualified Trust since the last filing. This activity documents the roll forward of the Qualified Trust balances. Annually the Company supplies the trust fund statements to the Commission. These statements are included in this section. Below is a list of the schedules included.

Qualified Trust Analysis, Statements and Balances Supporting Schedules

- E.1 Analysis of Qualified Trust Balances 2011 - 2014
- E.2 Trustee Statements – Qualified Trust, Monticello (All Managers, MN Jurisdiction)
- E.3 Trustee Statements – Qualified Trust, Monticello (By Manager, Total Company)
- E.4 Trustee Statements – Qualified Trust, Prairie Island Unit 1 (All Managers, MN Jurisdiction)
- E.5 Trustee Statements – Qualified Trust, Prairie Island Unit 1 (By Manager, Total Company)
- E.6 Trustee Statements – Qualified Trust, Prairie Island Unit 2 (All Managers, MN Jurisdiction)
- E.7 Trustee Statements – Qualified Trust, Prairie Island Unit 2 (By Manager, Total Company)

Xcel Energy
Qualified Trust Analysis, Statements and Balances
2011 Minnesota Jurisdiction Balance

Docket No. E002/M-14-761
Schedule E.1
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	Beginning Balance	Accruals	Gains & Losses	Dividends & Interest	Commissions, Taxes & Fees	Transfers & Adjustments	Ending Balance
Qualified Trust							
Prairie Island Unit 1	273,087,272	-	152,216	7,558,363	(4,269,378)	20,389	276,548,863
Prairie Island Unit 2	290,413,419	-	526,486	8,216,886	(4,600,428)	20,552	294,576,915
Monticello	341,144,100	-	(744,166)	9,271,745	(5,198,587)	29,059	344,502,150
Total	904,644,791	-	(65,464)	25,046,994	(14,068,393)	70,000	915,627,928

Xcel Energy
Qualified Trust Analysis, Statements and Balances
2012 Minnesota Jurisdiction Balance

Docket No. E002/M-14-761
Schedule E.1
Page 2 of 4

	Beginning Balance	Accruals	Gains & Losses	Dividends & Interest	Commissions, Taxes & Fees	Transfers & Adjustments	Ending Balance
Qualified Trust							
Prairie Island Unit 1	276,548,863	-	3,577,965	7,728,183	(3,679,199)	2,211	284,178,023
Prairie Island Unit 2	294,576,915	-	4,197,428	8,024,965	(3,921,800)	2,246	302,879,754
Monticello	344,502,150	-	3,872,236	9,544,254	(4,600,273)	3,187	353,321,554
Total	915,627,928	-	11,647,629	25,297,402	(12,201,271)	7,644	940,379,332

Xcel Energy
Qualified Trust Analysis, Statements and Balances
2013 Minnesota Jurisdiction Balance

Docket No. E002/M-14-761
Schedule E.1
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	Beginning Balance	Accruals	Gains & Losses	Dividends & Interest	Commissions, Taxes & Fees	Transfers & Adjustments	Ending Balance
Qualified Trust							
Prairie Island Unit 1	284,178,023	-	4,360,160	6,158,549	(5,335,525)	-	289,361,208
Prairie Island Unit 2	302,879,754	-	4,809,515	6,568,709	(5,654,478)	-	308,603,500
Monticello	353,321,554	-	5,613,723	7,713,103	(6,250,894)	-	360,397,486
Total	940,379,332	-	14,783,398	20,440,361	(17,240,896)	-	958,362,195

Xcel Energy
 Qualified Trust Analysis, Statements and Balances
 2014 Minnesota Jurisdiction Balance

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 Schedule E.1
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	Beginning Balance	Accruals	Gains & Losses	Dividends & Interest	Commissions, Taxes & Fees	Transfers & Adjustments	Ending Balance Jun. 30, 2014
Qualified Trust							
Prairie Island Unit 1	289,361,208	-	1,007,000	3,779,731	(4,251,580)	-	289,896,360
Prairie Island Unit 2	308,603,500	-	1,902,869	4,035,894	(4,736,406)	-	309,805,857
Monticello	360,397,486	-	1,336,872	4,701,552	(5,470,582)	-	360,965,328
Total	958,362,195	-	4,246,741	12,517,177	(14,458,568)	-	960,667,545



BNY MELLON

TRDNSN NSNF09220102 MONTHLY FINAL 094253
INVESTMENT DETAIL
NSN F092201
XCEL ENERGY NDT
NSP/XCEL ENERGY NDT

30 JUNE 2014

2014-06-30 CYCLE 2 09:42:53 RUN DATE: 14-JUL-14
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<u>SHARES/ PAR VALUE</u>	<u>SECURITY DESCRIPTION</u>	<u>COST</u>	<u>PRICE</u>	<u>MARKET VALUE</u>	<u>UNREALIZED GAIN/LOSS</u>
<u>INVESTMENTS UNIT OF PARTICIPATION</u>					
37,122,924.1150	MONTICELLO QUALIFIED MTU	360,965,327.96	11.6287	431,693,946.26	70,728,618.30
TOTAL INVESTMENTS UNIT OF PARTICIPATION		360,965,327.96		431,693,946.26	70,728,618.30
TOTAL INVESTMENT		360,965,327.96		431,693,946.26	70,728,618.30



BNY MELLON

TRDNSN NSNF09226002 MONTHLY FINAL 094253

2014-06-30 CYCLE 2 09:42:53 RUN DATE: 14-JUL-14

INVESTMENT DETAIL

NSN F092260

30 JUNE 2014

PAGE: 1

CASH - MONTICELLO

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XCEL ENERGY NDT

<u>SHARES/ PAR VALUE</u>	<u>SECURITY DESCRIPTION</u>	<u>COST</u>	<u>PRICE</u>	<u>MARKET VALUE</u>	<u>UNREALIZED GAIN/LOSS</u>
<u>INVESTMENTS CASH EQUIVALENTS</u>					
2,201,133.4800	FIDELITY INSTL MM PRIME 690	2,201,133.48	100.0000	2,201,133.48	0.00
TOTAL INVESTMENTS CASH EQUIVALENTS		2,201,133.48		2,201,133.48	0.00
TOTAL INVESTMENT		2,201,133.48		2,201,133.48	0.00



BNY MELLON

TRDNSN NSNF09226102 MONTHLY FINAL 094253
INVESTMENT DETAIL
NSN F092261
PARAMETRIC US - MONTICELLO
XCEL ENERGY NDT

30 JUNE 2014

2014-06-30 CYCLE 2 09:42:53 RUN DATE: 14-JUL-14
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<u>SHARES/ PAR VALUE</u>	<u>SECURITY DESCRIPTION</u>	<u>COST</u>	<u>PRICE</u>	<u>MARKET VALUE</u>	<u>UNREALIZED GAIN/LOSS</u>
<u>INVESTMENTS CASH EQUIVALENTS</u>					
87.6800	BNY MELLON CASH RESERVE 0.010% 12/31/2049 DD 06/26/97	87.68	100.0000	87.68	0.00
347,822.9800	FIDELITY INSTL MM PRIME 690	347,822.98	100.0000	347,822.98	0.00
TOTAL INVESTMENTS CASH EQUIVALENTS		347,910.66		347,910.66	0.00
<u>INVESTMENTS EQUITY</u>					
336.0000	ACTAVIS PLC	40,839.45	223.0500	74,944.80	34,105.35
461.0000	AIRCASTLE LTD SHS	5,628.81	17.7700	8,191.97	2,563.16
881.0000	ALLEGION PLC	19,534.23	56.6800	49,935.08	30,400.85
1,278.0000	ALKERMES PLC	22,433.80	50.3300	64,321.74	41,887.94
1,782.0000	AMDOCS LTD COM	52,814.30	46.3300	82,560.06	29,745.76
2,464.0000	AON CORP	120,760.64	90.0900	221,981.76	101,221.12
152.0000	ARCH CAPITAL GROUP LTD SHS	4,479.94	57.4400	8,730.88	4,250.94
239.0000	ARGO GROUP INTERNATIONAL HOLDINGS LTD COM	6,172.72	51.1100	12,215.29	6,042.57
562.0000	ASPEN INSURANCE HOLDINGS LIMITED SHS	13,965.70	45.4200	25,526.04	11,560.34



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1,966.0000	ASSURED GUARANTY LTD SHS	26,934.20	24.5000	48,167.00	21,232.80
1,028.0000	AXIS CAPITAL HLDGS LTD SHS	32,054.41	44.2800	45,519.84	13,465.43
4,744.0000	ACCENTURE PLC	194,896.57	80.8400	383,504.96	188,608.39
1,137.0000	BUNGE LIMITED COM	70,353.28	75.6400	86,002.68	15,649.40
4,243.0000	COVIDIEN PLC	166,270.99	90.1800	382,633.74	216,362.75
1,117.0000	DELPHI AUTOMOTIVE PLC	30,192.51	68.7400	76,782.58	46,590.07
3,423.0000	EATON CORP PLC	176,216.04	77.1800	264,187.14	87,971.10
538.0000	ENDURANCE SPECIALTY HLDGS LTD SHS	19,787.64	51.5900	27,755.42	7,967.78
712.0000	ENDO INTERNATIONAL PLC	25,508.56	70.0200	49,854.24	24,345.68
50.0000	ENSTAR GROUP LIMITED SHS	5,024.00	150.7300	7,536.50	2,512.50
364.0000	EVEREST RE GROUP INC COM	29,388.06	160.4900	58,418.36	29,030.30
189.0000	FRESH DEL MONTE PRODUCE	4,887.54	30.6500	5,792.85	905.31
3,425.0000	FRUIT OF THE LOOM INC CL A	29,060.51	8.4848	29,060.51	0.00
16.0000	GLOBAL INDEMNITY PLC	343.52	25.9900	415.84	72.32
222.0000	GREENLIGHT CAPITAL RE LTD CL A	5,692.08	32.9400	7,312.68	1,620.60
245.0000	HELEN OF TROY LTD NEW	7,935.55	60.6300	14,854.35	6,918.80



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866.0000	HERBALIFE LTD	20,641.11	64.5400	55,891.64	35,250.53
2,645.0000	INGERSOLL-RAND PUBLIC LIMITED COMPANY	77,343.32	62.5100	165,338.95	87,995.63
1,254.0000	WEATHERFORD INTL PLC ORD SHS	18,037.79	23.0000	28,842.00	10,804.21
4,247.0000	INVESCO LTD	109,826.44	37.7500	160,324.25	50,497.81
461.0000	JAZZ PHARMACEUTICALS PLC	24,359.24	147.0100	67,771.61	43,412.37
1,033.0000	LIBERTY GLOBAL PLC	15,380.31	44.2200	45,679.26	30,298.95
1,033.0000	LIBERTY GLOBAL PLC SHS CL C	14,917.43	42.3100	43,706.23	28,788.80
530.0000	MALLINCKRODT PLC	16,325.33	80.0200	42,410.60	26,085.27
3,111.0000	MARVELL TECHNOLOGY GROUP LTD SHS	30,137.64	14.3300	44,580.63	14,442.99
1,519.0000	MICHAEL KORS HOLDINGS LTD	80,246.83	88.6500	134,659.35	54,412.52
495.0000	MONTPELIER RE HOLDINGS LTD CDT SHS	8,533.80	31.9500	15,815.25	7,281.45
615.0000	ALPHA & OMEGA SEMICONDUCTOR	5,024.55	9.2700	5,701.05	676.50
2,192.0000	NABORS INDUSTRIES LTD SHS	33,533.37	29.3700	64,379.04	30,845.67
388.0000	ONEBEACON INSURANCE GROUP LTD CL A	4,904.32	15.5400	6,029.52	1,125.20
757.0000	ORIENT EXPRESS HOTELS LTD CL A SHS	7,607.85	14.5400	11,006.78	3,398.93



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464.0000	PARTNERRE HLDGS LTD BERMUDA COM	31,222.56	109.2100	50,673.44	19,450.88
1,883.0000	PENTAIR PLC	69,537.94	72.1200	135,801.96	66,264.02
296.0000	PLATINUM UNDERWRITERS HLDGS LTD SHS	9,528.24	64.8500	19,195.60	9,667.36
479.0000	RENAISSANCE RE HOLDINGS LTD	27,264.68	107.0000	51,253.00	23,988.32
296.0000	SIGNET JEWELERS LTD	13,643.79	110.5900	32,734.64	19,090.85
156.0000	THERAVANCE BIOPHARMA INC	3,059.17	31.8800	4,973.28	1,914.11
823.0000	VALIDUS HOLDINGS LTD COM SHS	20,525.62	38.2400	31,471.52	10,945.90
290.0000	GOLAR LNG LIMITED SHS	9,340.90	60.1000	17,429.00	8,088.10
54.0000	WHITE MOUNTAINS INS GRP INC	21,762.54	608.4400	32,855.76	11,093.22
1,691.0000	XL GROUP PLC	34,783.87	32.7300	55,346.43	20,562.56
2,602.0000	ACE LIMITED SHS	147,688.73	103.7000	269,827.40	122,138.67
777.0000	ALLIED WORLD ASSURANCE COMPANY HOLDINGS AG	21,991.69	38.0200	29,541.54	7,549.85
666.0000	GARMIN LTD	24,640.62	60.9000	40,559.40	15,918.78
1,550.0000	TYCO INTERNATIONAL LTD SHS	28,609.74	45.6000	70,680.00	42,070.26
711.0000	MAJICJACK VOCALTEC LTD	10,885.41	15.1200	10,750.32	135.09-



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134.0000	STRATASYS LTD	9,937.44	113.6300	15,226.42	5,288.98
40.0000	ASML HLDG N V N Y REGISTRY SHS NEW 2012	1,658.15	93.2700	3,730.80	2,072.65
2,234.0000	LYONDELLBASELL INDUSTRIES NV	93,843.10	97.6500	218,150.10	124,307.00
1,491.0000	NIELSEN N V	45,032.07	48.4100	72,179.31	27,147.24
2,783.0000	QIAGEN N V	52,001.94	24.4500	68,044.35	16,042.41
1,227.0000	BANCO LATINOAMERICANO DE COMERCIO EXTERIOR	20,822.19	29.6700	36,405.09	15,582.90
273.0000	COPA HOLDINGS S A CL A	21,153.92	142.5700	38,921.61	17,767.69
622.0000	ROYAL CARIBBEAN CRUISES LTD	18,155.94	55.6000	34,583.20	16,427.26
661.0000	AVAGO TECHNOLOGIES LTD	18,389.02	72.0700	47,638.27	29,249.25
5,269.0000	BALTIC TRADING LTD	30,665.58	5.9800	31,508.62	843.04
331.0000	TEEKAY CORPORATION COM	10,042.54	62.2500	20,604.75	10,562.21
9,096.0000	TEEKAY TANKERS LTD CLASS A	38,930.88	4.2900	39,021.84	90.96
422.0000	ABM INDUSTRIES INC	9,646.92	26.9800	11,385.56	1,738.64
1,103.0000	ADT CORP/THE	26,542.50	34.9400	38,538.82	11,996.32
3,917.0000	AFLAC INC	180,005.74	62.2500	243,833.25	63,827.51
762.0000	AGCO CORP	30,154.04	56.2200	42,839.64	12,685.60



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698.0000	AGL RESOURCES INC	27,672.25	55.0300	38,410.94	10,738.69
4,392.0000	AES CORP/THE	48,415.08	15.5500	68,295.60	19,880.52
9,791.0000	AK STEEL HOLDING CORP	57,549.84	7.9600	77,936.36	20,386.52
299.0000	AMAG PHARMACEUTICALS INC	5,142.80	20.7200	6,195.28	1,052.48
208.0000	AMC NETWORKS INC	5,606.62	61.4900	12,789.92	7,183.30
573.0000	AOL INC	8,256.93	39.7900	22,799.67	14,542.74
31,855.0000	AT&T INC	1,022,795.42	35.3600	1,126,392.80	103,597.38
98.0000	AZZ INC	2,131.50	46.0800	4,515.84	2,384.34
636.0000	AARON'S INC	17,178.36	35.6400	22,667.04	5,488.68
11,333.0000	ABBOTT LABORATORIES	266,174.67	40.9000	463,519.70	197,345.03
11,487.0000	ABBVIE INC	290,299.00	56.4400	648,326.28	358,027.28
303.0000	ABIOMED INC	4,878.30	25.1400	7,617.42	2,739.12
721.0000	ACADIA HEALTHCARE CO INC	16,164.82	45.5000	32,805.50	16,640.68
321.0000	ACADIA REALTY TRUST	6,480.99	28.0900	9,016.89	2,535.90
395.0000	ACI WORLDWIDE INC	15,102.21	55.8300	22,052.85	6,950.64
407.0000	ACORDA THERAPEUTICS INC	9,995.92	33.7100	13,719.97	3,724.05
3,365.0000	ACTIVISION BLIZZARD INC	39,456.49	22.3000	75,039.50	35,583.01



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546.0000	ACTUANT CORP	14,081.34	34.5700	18,875.22	4,793.88
345.0000	ACUITY BRANDS INC	18,864.60	138.2500	47,696.25	28,831.65
645.0000	ACXIOM CORP	7,759.35	21.6900	13,990.05	6,230.70
3,970.0000	ADOBE SYSTEMS INC	151,020.26	72.3600	287,269.20	136,248.94
237.0000	ADTRAN INC	4,917.75	22.5600	5,346.72	428.97
777.0000	ADVANCE AUTO PARTS INC	53,256.87	134.9200	104,832.84	51,575.97
888.0000	AECOM TECHNOLOGY CORP	25,465.52	32.2000	28,593.60	3,128.08
343.0000	AEGERION PHARMACEUTICALS INC	8,832.25	32.0900	11,006.87	2,174.62
264.0000	AEGION CORP	5,084.64	23.2700	6,143.28	1,058.64
18,093.0000	AEROPOSTALE INC	64,411.08	3.4900	63,144.57	1,266.51-
3,161.0000	AETNA INC	124,025.31	81.0800	256,293.88	132,268.57
331.0000	AFFILIATED MANAGERS GROUP INC	30,627.17	205.4000	67,987.40	37,360.23
2,766.0000	AGILENT TECHNOLOGIES INC	85,909.99	57.4400	158,879.04	72,969.05
502.0000	AIR LEASE CORP	13,023.13	38.5800	19,367.16	6,344.03
90.0000	AIR METHODS CORP	2,197.80	51.6500	4,648.50	2,450.70
1,788.0000	AIR PRODUCTS & CHEMICALS INC	120,443.55	128.6200	229,972.56	109,529.01
130.0000	AIRGAS INC	6,608.69	108.9100	14,158.30	7,549.61



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1,291.0000	AKAMAI TECHNOLOGIES INC	43,448.49	61.0600	78,828.46	35,379.97
756.0000	AKORN INC	9,880.92	33.2500	25,137.00	15,256.08
644.0000	ALASKA AIR GROUP INC	21,574.00	95.0500	61,212.20	39,638.20
220.0000	ALBANY INTERNATIONAL CORP	5,442.80	37.9600	8,351.20	2,908.40
7,872.0000	ALCOA INC	69,193.46	14.8900	117,214.08	48,020.62
137.0000	ALERE INC	4,737.46	37.4200	5,126.54	389.08
331.0000	ALEXANDER & BALDWIN INC	6,971.79	41.4500	13,719.95	6,748.16
47.0000	ALEXANDER'S INC	15,373.73	369.4700	17,365.09	1,991.36
585.0000	ALEXANDRIA REAL ESTATE EQUITIE	40,491.22	77.6400	45,419.40	4,928.18
650.0000	ALEXION PHARMACEUTICALS INC	28,170.82	156.2500	101,562.50	73,391.68
488.0000	ALIGN TECHNOLOGY INC	10,784.80	56.0400	27,347.52	16,562.72
95.0000	ALLEGHANY CORP	26,568.30	438.1200	41,621.40	15,053.10
166.0000	ALLEGHENY TECHNOLOGIES INC	4,955.10	45.1000	7,486.60	2,531.50
2,423.0000	ALLERGAN INC/UNITED STATES	137,601.45	169.2200	410,020.06	272,418.61
243.0000	ALLETE INC	9,907.11	51.3500	12,478.05	2,570.94
238.0000	ALLIANCE DATA SYSTEMS CORP	33,154.20	281.2500	66,937.50	33,783.30
571.0000	ALLIANT ENERGY CORP	24,943.17	60.8600	34,751.06	9,807.89



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230.0000	ALLIANT TECHSYSTEMS INC	18,611.60	133.9200	30,801.60	12,190.00
19,147.0000	ALLIED NEVADA GOLD CORP	73,070.70	3.7600	71,992.72	1,077.98-
3,298.0000	ALLSTATE CORP/THE	104,066.78	58.7200	193,658.56	89,591.78
531.0000	ALTERA CORP	9,859.40	34.7600	18,457.56	8,598.16
12,581.0000	ALTRIA GROUP INC	214,755.33	41.9400	527,647.14	312,891.81
2,050.0000	AMAZON.COM INC	137,196.58	324.7800	665,799.00	528,602.42
69.0000	AMERCO	6,606.06	290.7600	20,062.44	13,456.38
1,767.0000	AMEREN CORP	59,630.12	40.8800	72,234.96	12,604.84
764.0000	AMERICAN AIRLS GROUP INC	6,646.80	42.9600	32,821.44	26,174.64
227.0000	AMERICAN ASSETS TRUST INC	5,077.99	34.5500	7,842.85	2,764.86
545.0000	AMERICAN AXLE & MANUFACTURING	6,058.20	18.8900	10,295.05	4,236.85
540.0000	AMERICAN CAMPUS COMMUNITIES IN	18,694.80	38.2400	20,649.60	1,954.80
3,925.0000	AMERICAN CAPITAL LTD	35,913.75	15.2900	60,013.25	24,099.50
3,839.0000	AMERICAN ELECTRIC POWER CO INC	141,612.04	55.7700	214,101.03	72,488.99
473.0000	AMERICAN EQUITY INVESTMENT LIF	5,832.09	24.6000	11,635.80	5,803.71
6,986.0000	AMERICAN EXPRESS CO	379,379.65	94.8700	662,761.82	283,382.17
846.0000	AMERICAN FINANCIAL GROUP INC/O	24,968.34	59.5600	50,387.76	25,419.42



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10,847.0000	AMERICAN INTERNATIONAL GROUP I	406,695.38	54.5800	592,029.26	185,333.88
139.0000	AMERICAN PUBLIC EDUCATION INC	4,630.09	34.3800	4,778.82	148.73
187.0000	AMERICAN RAILCAR INDUSTRIES IN	5,864.32	67.7700	12,672.99	6,808.67
3,153.0000	AMERICAN TOWER CORP	140,014.96	89.9800	283,706.94	143,691.98
1,207.0000	AMERICAN WATER WORKS CO INC	42,866.08	49.4500	59,686.15	16,820.07
19.0000	AMERISAFE INC	421.80	40.6700	772.73	350.93
1,368.0000	AMERISOURCEBERGEN CORP	61,769.36	72.6600	99,398.88	37,629.52
1,719.0000	AMERIPRISE FINANCIAL INC	80,355.51	120.0000	206,280.00	125,924.49
2,226.0000	AMETEK INC	65,451.68	52.2800	116,375.28	50,923.60
5,540.0000	AMGEN INC	304,605.53	118.3700	655,769.80	351,164.27
8,862.0000	AMPIO PHARMACEUTICALS INC	73,731.84	8.3500	73,997.70	265.86
747.0000	AMPHENOL CORP	45,111.96	96.3400	71,965.98	26,854.02
194.0000	AMSURG CORP	4,974.16	45.5700	8,840.58	3,866.42
272.0000	AMTRUST FINANCIAL SERVICES INC	4,958.94	41.8100	11,372.32	6,413.38
3,420.0000	ANADARKO PETROLEUM CORP	154,830.13	109.4700	374,387.40	219,557.27
2,548.0000	ANALOG DEVICES INC	99,087.60	54.0700	137,770.36	38,682.76
187.0000	ANDERSONS INC/THE	4,965.47	51.5800	9,645.46	4,679.99



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231.0000	ANIXTER INTERNATIONAL INC	14,125.65	100.0700	23,116.17	8,990.52
414.0000	ANN INC	10,780.56	41.1400	17,031.96	6,251.40
730.0000	ANSYS INC	34,079.88	75.8200	55,348.60	21,268.72
2,496.0000	APACHE CORP	167,643.33	100.6200	251,147.52	83,504.19
1,011.0000	APARTMENT INVESTMENT & MANAGEM	25,289.01	32.2700	32,624.97	7,335.96
924.0000	APOLLO COMMERCIAL REAL ESTATE	15,073.27	16.4900	15,236.76	163.49
41,424.0000	APPLE INC	473,766.66	92.9300	3,849,532.32	3,375,765.66
337.0000	APPLIED INDUSTRIAL TECHNOLOGIE	11,522.03	50.7300	17,096.01	5,573.98
7,112.0000	APPLIED MATERIALS INC	93,981.01	22.5500	160,375.60	66,394.59
535.0000	APTARGROUP INC	27,081.70	67.0100	35,850.35	8,768.65
3,636.0000	AQUA AMERICA INC	53,347.39	26.2200	95,335.92	41,988.53
519.0000	ARCBEST CORP	10,037.46	43.5100	22,581.69	12,544.23
3,020.0000	ARCH COAL INC	12,437.84	3.6500	11,023.00	1,414.84-
5,482.0000	ARCHER-DANIELS-MIDLAND CO	171,106.93	44.1100	241,811.02	70,704.09
1,649.0000	ARES CAPITAL CORP	24,124.87	17.8600	29,451.14	5,326.27
11,908.0000	ARIAD PHARMACEUTICALS INC	70,835.82	6.3700	75,853.96	5,018.14
18,547.0000	ARMOUR RESIDENTIAL REIT INC	80,493.98	4.3300	80,308.51	185.47-



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168.0000	ARMSTRONG WORLD INDUSTRIES INC	7,393.68	57.4300	9,648.24	2,254.56
984.0000	ARRIS GROUP INC	10,784.64	32.5300	32,009.52	21,224.88
1,053.0000	ARROW ELECTRONICS INC	35,296.56	60.4100	63,611.73	28,315.17
434.0000	ARROW FINANCIAL CORP	9,804.98	25.9400	11,257.96	1,452.98
549.0000	ARTISAN PARTNERS ASSET MANAGEM	29,561.75	56.6800	31,117.32	1,555.57
593.0000	ARUBA NETWORKS INC	8,723.03	17.5200	10,389.36	1,666.33
124.0000	ASCENA RETAIL GROUP INC	2,060.26	17.1000	2,120.40	60.14
1,195.0000	ASHFORD HOSPITALITY TRUST INC	10,372.60	11.5400	13,790.30	3,417.70
686.0000	ASHLAND INC	37,778.02	108.7400	74,595.64	36,817.62
1,040.0000	ASPEN TECHNOLOGY INC	20,317.25	46.4000	48,256.00	27,938.75
963.0000	ASSOCIATED BANC-CORP	10,275.21	18.0800	17,411.04	7,135.83
444.0000	ASSURANT INC	18,131.88	65.5500	29,104.20	10,972.32
142.0000	ASTEC INDUSTRIES INC	4,979.94	43.8800	6,230.96	1,251.02
211.0000	ATHENAHEALTH INC	20,047.93	125.1300	26,402.43	6,354.50
7,175.0000	ATLANTIC POWER CORP	28,197.75	4.1000	29,417.50	1,219.75
3,302.0000	ATMEL CORP	20,835.62	9.3700	30,939.74	10,104.12
778.0000	ATMOS ENERGY CORP	24,258.04	53.4000	41,545.20	17,287.16



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51.0000	ATRION CORP	10,220.40	326.0000	16,626.00	6,405.60
450.0000	ATWOOD OCEANICS INC	18,841.50	52.4800	23,616.00	4,774.50
1,827.0000	AUTODESK INC	63,107.87	56.3800	103,006.26	39,898.39
389.0000	AUTOLIV INC	20,360.26	106.5800	41,459.62	21,099.36
2,190.0000	AUTOMATIC DATA PROCESSING INC	94,111.11	79.2800	173,623.20	79,512.09
216.0000	AUTONATION INC	9,871.20	59.6800	12,890.88	3,019.68
254.0000	AUXILIUM PHARMACEUTICALS INC	4,859.02	20.0600	5,095.24	236.22
491.0000	AVERY DENNISON CORP	19,961.42	51.2500	25,163.75	5,202.33
835.0000	AVIS BUDGET GROUP INC	13,201.35	59.6900	49,841.15	36,639.80
944.0000	AVNET INC	30,089.27	44.3100	41,828.64	11,739.37
3,049.0000	AXCELIS TECHNOLOGIES INC	5,366.24	2.0000	6,098.00	731.76
153.0000	AXIALL CORP	3,642.93	47.2700	7,232.31	3,589.38
3,254.0000	BB&T CORP	96,581.03	39.4300	128,305.22	31,724.19
224.0000	B&G FOODS INC	4,650.24	32.6900	7,322.56	2,672.32
672.0000	BOK FINANCIAL CORP	35,207.42	66.6000	44,755.20	9,547.78
1,005.0000	BABCOCK & WILCOX CO/THE	25,984.37	32.4600	32,622.30	6,637.93
135.0000	BADGER METER INC	4,965.30	52.6500	7,107.75	2,142.45



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910.0000	BAKER HUGHES INC	39,952.28	74.4500	67,749.50	27,797.22
123.0000	BALCHEM CORP	5,078.67	53.5600	6,587.88	1,509.21
450.0000	BALL CORP	19,800.00	62.6800	28,206.00	8,406.00
281.0000	BALLY TECHNOLOGIES INC	12,420.20	65.7200	18,467.32	6,047.12
132.0000	BANCFIRST CORP	5,043.72	61.9000	8,170.80	3,127.08
516.0000	BANCORP INC/DE	5,154.84	11.9100	6,145.56	990.72
657.0000	BANCORPSOUTH INC	6,878.79	24.5700	16,142.49	9,263.70
34,853.0000	BANK OF AMERICA CORP	378,747.45	15.3700	535,690.61	156,943.16
876.0000	BANK OF HAWAII CORP	40,008.36	58.6900	51,412.44	11,404.08
23.0000	BANK OF MONTREAL	954.29	73.5900	1,692.57	738.28
1,382.0000	BANK MUTUAL CORP	4,906.10	5.8000	8,015.60	3,109.50
448.0000	BANK OF THE OZARKS INC	5,622.40	33.4500	14,985.60	9,363.20
3,815.0000	BANK OF NEW YORK MELLON CORP/T	100,542.13	37.4800	142,986.20	42,444.07
266.0000	BANKUNITED INC	7,097.57	33.4800	8,905.68	1,808.11
681.0000	CR BARD INC	51,133.43	143.0100	97,389.81	46,256.38
433.0000	BARNES GROUP INC	10,158.18	38.5400	16,687.82	6,529.64
4,574.0000	BAXTER INTERNATIONAL INC	207,112.54	72.3000	330,700.20	123,587.66



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554.0000	B/E AEROSPACE INC	16,813.90	92.4900	51,239.46	34,425.56
366.0000	BEACON ROOFING SUPPLY INC	8,132.52	33.1200	12,121.92	3,989.40
3,520.0000	BEAZER HOMES USA INC	70,111.06	20.9800	73,849.60	3,738.54
1,944.0000	BECTON DICKINSON AND CO	136,010.40	118.3000	229,975.20	93,964.80
1,980.0000	BED BATH & BEYOND INC	76,483.04	57.3800	113,612.40	37,129.36
377.0000	BELDEN INC	12,226.11	78.1600	29,466.32	17,240.21
838.0000	BEMIS CO INC	27,718.44	40.6600	34,073.08	6,354.64
483.0000	BENCHMARK ELECTRONICS INC	7,515.48	25.4800	12,306.84	4,791.36
614.0000	BENEFICIAL MUTUAL BANCORP INC	5,004.10	13.5600	8,325.84	3,321.74
924.0000	WR BERKLEY CORP	25,017.89	46.3100	42,790.44	17,772.55
12,122.0000	BERKSHIRE HATHAWAY INC	981,766.49	126.5600	1,534,160.32	552,393.83
233.0000	BERKSHIRE HILLS BANCORP INC	5,063.09	23.2200	5,410.26	347.17
1,496.0000	BEST BUY CO INC	21,464.76	31.0100	46,390.96	24,926.20
692.0000	BIG LOTS INC	13,930.52	45.7000	31,624.40	17,693.88
398.0000	BIOMARIN PHARMACEUTICAL INC	9,751.00	62.2100	24,759.58	15,008.58
1,006.0000	BIOGEN IDEC INC	104,323.96	315.3100	317,201.86	212,877.90
1,044.0000	BIOMED REALTY TRUST INC	19,575.00	21.8300	22,790.52	3,215.52



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3.0000	BIOLASE INC	0.00	2.2000	6.60	6.60
166.0000	BLACK HILLS CORP	4,968.38	61.3900	10,190.74	5,222.36
188.0000	BLACKBAUD INC	4,998.92	35.7400	6,719.12	1,720.20
194.0000	BLACKHAWK NETWORK HOLDINGS INC	4,588.10	26.8500	5,208.90	620.80
899.0000	BLACKROCK INC	173,720.85	319.6000	287,320.40	113,599.55
1,217.0000	H&R BLOCK INC	26,575.33	33.5200	40,793.84	14,218.51
646.0000	BLUCORA INC COM	9,864.42	18.8700	12,190.02	2,325.60
4,750.0000	BOEING CO/THE	370,581.52	127.2300	604,342.50	233,760.98
3,866.0000	BON-TON STORES INC/THE	39,781.14	10.3100	39,858.46	77.32
1,586.0000	BORGWARNER INC	48,905.61	65.1900	103,391.34	54,485.73
1,160.0000	BOSTON PROPERTIES INC	118,885.27	118.1800	137,088.80	18,203.53
9,147.0000	BOSTON SCIENTIFIC CORP	59,496.77	12.7700	116,807.19	57,310.42
216.0000	BOTTOMLINE TECHNOLOGIES INC	5,080.32	29.9200	6,462.72	1,382.40
610.0000	BOYD GAMING CORP	5,032.50	12.1300	7,399.30	2,366.80
1,639.0000	BRANDYWINE REALTY TRUST	20,192.48	15.6000	25,568.40	5,375.92
1,187.0000	BRIGHTCOVE INC	10,113.24	10.5400	12,510.98	2,397.74
674.0000	BRINKER INTERNATIONAL INC	16,560.18	48.6500	32,790.10	16,229.92



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13,104.0000	BRISTOL-MYERS SQUIBB CO	332,458.23	48.5100	635,675.04	303,216.81
88.0000	BRISTOW GROUP INC	4,955.28	80.6200	7,094.56	2,139.28
914.0000	BROADRIDGE FINANCIAL SOLUTIONS	19,651.00	41.6400	38,058.96	18,407.96
3,503.0000	BROCADE COMMUNICATIONS SYSTEMS	20,317.40	9.2000	32,227.60	11,910.20
963.0000	BROOKDALE SENIOR LIVING INC	20,242.26	33.3400	32,106.42	11,864.16
925.0000	BROWN & BROWN INC	23,300.75	30.7100	28,406.75	5,106.00
1,189.0000	BROWN-FORMAN CORP	47,614.92	94.1700	111,968.13	64,353.21
68.0000	BRUNOS INC NEW	680.00	10.0000	680.00	0.00
1,071.0000	BRUNSWICK CORP/DE	23,452.29	42.1300	45,121.23	21,668.94
337.0000	BUFFALO WILD WINGS INC	23,482.25	165.7100	55,844.27	32,362.02
242.0000	CAI INTERNATIONAL INC	4,927.12	22.0100	5,326.42	399.30
1,851.0000	CBL & ASSOCIATES PROPERTIES IN	31,057.90	19.0000	35,169.00	4,111.10
5,178.0000	CBS CORP	146,803.55	62.1400	321,760.92	174,957.37
419.0000	CBOE HOLDINGS INC	10,102.09	49.2100	20,618.99	10,516.90
2,246.0000	CBRE GROUP INC	44,178.82	32.0400	71,961.84	27,783.02
533.0000	CF INDUSTRIES HOLDINGS INC	75,005.64	240.5300	128,202.49	53,196.85
2,298.0000	CIGNA CORPORATION COM	89,460.91	91.9700	211,347.06	121,886.15



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1,990.0000	CIT GROUP INC	73,740.45	45.7600	91,062.40	17,321.95
1,034.0000	CME GROUP INC	61,785.31	70.9500	73,362.30	11,576.99
216.0000	CSS INDUSTRIES INC	4,965.84	26.3700	5,695.92	730.08
749.0000	CNA FINANCIAL CORP	20,432.72	40.4200	30,274.58	9,841.86
1,763.0000	CNO FINANCIAL GROUP INC	12,781.75	17.8000	31,381.40	18,599.65
278.0000	CSG SYSTEMS INTERNATIONAL INC	5,017.90	26.1100	7,258.58	2,240.68
86.0000	CSR PLC ADR	1,262.45	40.4700	3,480.42	2,217.97
8,244.0000	CSX CORP	88,925.56	30.8100	253,997.64	165,072.08
551.0000	CTS CORP	4,959.00	18.7000	10,303.70	5,344.70
710.0000	CVB FINANCIAL CORP	6,248.00	16.0300	11,381.30	5,133.30
9,856.0000	CVS CAREMARK CORP	327,859.55	75.3700	742,846.72	414,987.17
8,919.0000	CYS INVTS INC	79,168.08	9.0200	80,449.38	1,281.30
3,049.0000	CA INC	72,155.81	28.7400	87,628.26	15,472.45
587.0000	CABELA'S INC	18,853.89	62.4000	36,628.80	17,774.91
522.0000	CABOT CORP	20,065.68	57.9900	30,270.78	10,205.10
3,093.0000	CABOT OIL & GAS CORP	49,894.78	34.1400	105,595.02	55,700.24



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2,138.0000	CADENCE DESIGN SYSTEMS INC	21,828.98	17.4900	37,393.62	15,564.64
778.0000	CAESARS ACQUISITION CO CL A	6,721.92	12.3700	9,623.86	2,901.94
145.0000	CAESARS ENTERTAINMENT CORP	1,856.00	18.0800	2,621.60	765.60
449.0000	CALGON CARBON CORP	7,835.05	22.3300	10,026.17	2,191.12
781.0000	CALLAWAY GOLF CO	4,810.96	8.3200	6,497.92	1,686.96
4,562.0000	CALPINE CORP	57,759.27	23.8100	108,621.22	50,861.95
558.0000	CAMDEN PROPERTY TRUST	35,583.66	71.1500	39,701.70	4,118.04
1,948.0000	CAMERON INTERNATIONAL CORP	80,481.62	67.7100	131,899.08	51,417.46
1,259.0000	CAMPBELL SOUP CO	42,692.69	45.8100	57,674.79	14,982.10
117.0000	CAPELLA EDUCATION CO	4,999.41	54.3900	6,363.63	1,364.22
1,683.0000	CAPITAL ONE FINANCIAL CORP	94,733.83	82.6000	139,015.80	44,281.97
550.0000	CAPITAL SENIOR LIVING CORP	10,114.50	23.8400	13,112.00	2,997.50
56.0000	CARBO CERAMICS INC	5,087.60	154.1200	8,630.72	3,543.12
2,651.0000	CARDINAL HEALTH INC	125,703.89	68.5600	181,752.56	56,048.67
343.0000	CARDTRONICS INC	7,487.69	34.0800	11,689.44	4,201.75
1,422.0000	CAREFUSION CORP	49,087.89	44.3500	63,065.70	13,977.81
487.0000	CARLISLE COS INC	23,103.28	86.6200	42,183.94	19,080.66



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1,940.0000	CARMAX INC	50,614.60	52.0100	100,899.40	50,284.80
350.0000	CARPENTER TECHNOLOGY CORP	18,644.50	63.2500	22,137.50	3,493.00
727.0000	CARTER'S INC	29,892.09	68.9300	50,112.11	20,220.02
331.0000	CASEY'S GENERAL STORES INC	14,247.60	70.2900	23,265.99	9,018.39
517.0000	CATAMARAN CORP	9,634.31	44.1600	22,830.72	13,196.41
4,931.0000	CATERPILLAR INC	309,182.92	108.6700	535,851.77	226,668.85
160.0000	CATHAY GENERAL BANCORP	2,235.20	25.5600	4,089.60	1,854.40
211.0000	CAVCO INDUSTRIES INC	9,826.27	85.3000	17,998.30	8,172.03
327.0000	CAVIUM INC	10,048.71	49.6600	16,238.82	6,190.11
969.0000	CEDAR REALTY TRUST INC	4,903.14	6.2500	6,056.25	1,153.11
360.0000	CELADON GROUP INC	4,867.20	21.3200	7,675.20	2,808.00
1,378.0000	CELANESE CORP	44,743.66	64.2800	88,577.84	43,834.18
6,834.0000	CELGENE CORP	182,957.64	85.8800	586,903.92	403,946.28
1,112.0000	CELLDEX THERAPEUTICS INC	7,261.36	16.3200	18,147.84	10,886.48
398.0000	CENTENE CORP	13,476.28	75.6100	30,092.78	16,616.50
5,134.0000	CENTERPOINT ENERGY INC	74,758.68	25.5400	131,122.36	56,363.68
196.0000	CENTERSTATE BANKS INC	1,250.48	11.2000	2,195.20	944.72



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371.0000	CENTRAL PACIFIC FINANCIAL CO	4,889.59	19.8500	7,364.35	2,474.76
781.0000	CENTURY ALUMINUM CO	7,950.58	15.6800	12,246.08	4,295.50
491.0000	CEPHEID INC	15,849.48	47.9400	23,538.54	7,689.06
580.0000	CENTURYLINK INC	20,295.95	36.2000	20,996.00	700.05
2,323.0000	CERNER CORP	62,438.42	51.5800	119,820.34	57,381.92
2,787.0000	CHANNELADVISOR CORP	74,134.20	26.3600	73,465.32	668.88-
411.0000	CHARLES RIVER LABORATORIES INT	16,152.30	53.5200	21,996.72	5,844.42
234.0000	CHART INDUSTRIES INC	11,678.94	82.7300	19,358.82	7,679.88
461.0000	CHARTER COMMUNICATIONS INC	25,125.33	158.3800	73,013.18	47,887.85
2,957.0000	CHATHAM LODGING TRUST	66,118.52	21.9000	64,758.30	1,360.22-
470.0000	CHEESECAKE FACTORY INC/THE	15,113.04	46.4200	21,817.40	6,704.36
77.0000	CHEMED CORP	4,924.15	93.7200	7,216.44	2,292.29
272.0000	CHEMICAL FINANCIAL CORP	4,972.16	28.0800	7,637.76	2,665.60
676.0000	CHEMTURA CORP	13,824.20	26.1300	17,663.88	3,839.68
731.0000	CHENIERE ENERGY INC	9,188.67	71.7000	52,412.70	43,224.03
2,050.0000	CHESAPEAKE ENERGY CORP	41,319.74	31.0800	63,714.00	22,394.26
13,925.0000	CHEVRON CORP	901,109.02	130.5500	1,817,908.75	916,799.73



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832.0000	CHICAGO BRIDGE & IRON CO NV	28,427.57	68.2000	56,742.40	28,314.83
1,879.0000	CHICO'S FAS INC	23,908.69	16.9600	31,867.84	7,959.15
208.0000	THE CHILDRENS PLACE INC	9,191.52	49.6300	10,323.04	1,131.52
14,172.0000	CHIMERA INVESTMENT CORP	38,264.40	3.1900	45,208.68	6,944.28
216.0000	CHIPOTLE MEXICAN GRILL INC	43,333.73	592.5100	127,982.16	84,648.43
358.0000	CHIQUITA BRANDS INTERNATIONAL	3,157.56	10.8500	3,884.30	726.74
1,822.0000	CHUBB CORP	94,868.44	92.1700	167,933.74	73,065.30
1,137.0000	CHURCH & DWIGHT CO INC	42,433.67	69.9500	79,533.15	37,099.48
115.0000	CHURCHILL DOWNS INC	4,940.40	90.1100	10,362.65	5,422.25
1,857.0000	CIENA CORP	31,006.71	21.6600	40,222.62	9,215.91
683.0000	CIMAREX ENERGY CO	41,225.88	143.4600	97,983.18	56,757.30
1,350.0000	CINCINNATI BELL INC	4,468.50	3.9300	5,305.50	837.00
177.0000	CINCINNATI FINANCIAL CORP	4,980.78	48.0400	8,503.08	3,522.30
739.0000	CINEMARK HOLDINGS INC	14,809.56	35.3600	26,131.04	11,321.48
124.0000	CIRCOR INTERNATIONAL INC	4,977.36	77.1300	9,564.12	4,586.76
22,630.0000	CISCO SYSTEMS INC	520,707.57	24.8500	562,355.50	41,647.93
523.0000	CIRRUS LOGIC INC	8,969.45	22.7400	11,893.02	2,923.57



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885.0000	CINTAS CORP	31,602.30	63.5400	56,232.90	24,630.60
13,647.0000	CITIGROUP INC	533,665.09	47.1000	642,773.70	109,108.61
1,275.0000	CITRIX SYSTEMS INC	47,046.86	62.5500	79,751.25	32,704.39
156.0000	CITY HOLDING CO	4,907.76	45.1200	7,038.72	2,130.96
150.0000	CITY NATIONAL CORP/CA	9,775.50	75.7600	11,364.00	1,588.50
1,170.0000	CIVEO CORP	12,901.21	25.0300	29,285.10	16,383.89
401.0000	CLARCOR INC	18,201.39	61.8500	24,801.85	6,600.46
160.0000	CLEARWATER PAPER CORP	5,031.20	61.7200	9,875.20	4,844.00
891.0000	CLOROX CO	59,799.48	91.4000	81,437.40	21,637.92
941.0000	COBALT INTERNATIONAL ENERGY IN	12,411.79	18.3500	17,267.35	4,855.56
795.0000	COBIZ FINANCIAL INC	4,984.65	10.7700	8,562.15	3,577.50
166.0000	COCA-COLA BOTTLING CO CONSOLIDATED	10,121.02	73.6700	12,229.22	2,108.20
28,056.0000	COCA-COLA CO/THE	676,977.26	42.3600	1,188,452.16	511,474.90
2,717.0000	COCA-COLA ENTERPRISES INC	57,653.58	47.7800	129,818.26	72,164.68
8,433.0000	COEUR MINING INC	75,728.34	9.1800	77,414.94	1,686.60
320.0000	COGENT COMMUNICATIONS HOLDINGS INC	5,049.60	34.5500	11,056.00	6,006.40



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660.0000	COGNEX CORP	11,121.00	38.4000	25,344.00	14,223.00
4,170.0000	COGNIZANT TECHNOLOGY SOLUTIONS	85,039.34	48.9100	203,954.70	118,915.36
157.0000	COHEN & STEERS INC	4,953.35	43.3800	6,810.66	1,857.31
200.0000	COHERENT INC	10,368.00	66.1700	13,234.00	2,866.00
812.0000	COLFAX CORP	31,773.56	74.5400	60,526.48	28,752.92
7,560.0000	COLGATE-PALMOLIVE CO	236,802.27	68.1800	515,440.80	278,638.53
275.0000	COLONY FINANCIAL INC	5,035.25	23.2200	6,385.50	1,350.25
314.0000	COLUMBIA BANKING SYSTEM INC	5,221.82	26.3100	8,261.34	3,039.52
252.0000	COLUMBUS MCKINNON CORP/NY	4,956.84	27.0500	6,816.60	1,859.76
18,539.0000	COMCAST CORP	454,058.43	53.6800	995,173.52	541,115.09
1,606.0000	COMERICA INC	43,956.37	50.1600	80,556.96	36,600.59
1,262.0000	COMMERCE BANCSHARES INC/MO	42,850.52	46.5000	58,683.00	15,832.48
902.0000	COMMERCIAL METALS CO	12,934.68	17.3100	15,613.62	2,678.94
1,496.0000	COMMONWEALTH REIT	29,873.99	26.3200	39,374.72	9,500.73
1,466.0000	COMMUNITY BANK SYSTEM INC	35,579.82	36.2000	53,069.20	17,489.38
144.0000	COMMUNITY HEALTH SYSTEMS INC	2,537.28	45.3700	6,533.28	3,996.00
739.0000	COMMUNITY TRUST BANCORP INC	18,132.37	34.2200	25,288.58	7,156.21



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350.0000	COMMVault SYSTEMS INC	14,434.00	49.1700	17,209.50	2,775.50
132.0000	COMPASS MINERALS INTERNATIONAL	10,042.56	95.7400	12,637.68	2,595.12
1,164.0000	COMPUTER SCIENCES CORP	56,844.87	63.2000	73,564.80	16,719.93
1,735.0000	COMPUWARE CORP	13,628.77	9.9900	17,332.65	3,703.88
681.0000	COMSTOCK RESOURCES INC	9,947.22	28.8400	19,640.04	9,692.82
213.0000	COMTECH TELECOMMUNICATIONS COR	5,695.62	37.3300	7,951.29	2,255.67
3,672.0000	CONAGRA FOODS INC	90,000.72	29.6800	108,984.96	18,984.24
572.0000	CON-WAY INC	20,031.44	50.4100	28,834.52	8,803.08
844.0000	CONCHO RESOURCES INC/MIDLAND T	47,478.00	144.5000	121,958.00	74,480.00
623.0000	CONCUR TECHNOLOGIES INC	35,629.17	93.3400	58,150.82	22,521.65
161.0000	CONMED CORP	4,929.82	44.1500	7,108.15	2,178.33
170.0000	CONNECTICUT WATER SERVICE INC	5,026.90	33.8700	5,757.90	731.00
9,110.0000	CONOCOPHILLIPS	412,440.41	85.7300	781,000.30	368,559.89
2,684.0000	CONSOLIDATED EDISON INC	125,292.07	57.7400	154,974.16	29,682.09
1,265.0000	CONSTELLATION BRANDS INC	27,539.05	88.1300	111,484.45	83,945.40
15.0000	CONTANGO OIL & GAS CO	550.35	42.3100	634.65	84.30
527.0000	CONTINENTAL RESOURCES INC/OK	27,333.68	158.0400	83,287.08	55,953.40



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1,515.0000	CONVERGYS CORP	19,967.70	21.4400	32,481.60	12,513.90
376.0000	CONVERSANT INC	6,128.80	25.4000	9,550.40	3,421.60
290.0000	COOPER COS INC/THE	16,721.40	135.5300	39,303.70	22,582.30
494.0000	COOPER TIRE & RUBBER CO	9,835.54	30.0000	14,820.00	4,984.46
698.0000	COPART INC	12,427.89	35.9600	25,100.08	12,672.19
192.0000	CORELOGIC INC	5,018.88	30.3600	5,829.12	810.24
815.0000	CORNERSTONE ONDEMAND INC	23,040.05	46.0200	37,506.30	14,466.25
275.0000	CORPORATE EXECUTIVE BOARD CO/T	11,280.50	68.2200	18,760.50	7,480.00
568.0000	CORPORATE OFFICE PROPERTIES TR	12,342.64	27.8100	15,796.08	3,453.44
2,616.0000	COSTCO WHOLESALE CORP	130,930.28	115.1600	301,258.56	170,328.28
315.0000	COSTAR GROUP INC	21,128.49	158.1700	49,823.55	28,695.06
1,318.0000	COTY INC CL A	22,208.30	17.1300	22,577.34	369.04
2,272.0000	COUSINS PROPERTIES INC	15,008.44	12.4500	28,286.40	13,277.96
474.0000	COVANCE INC	24,887.06	85.5800	40,564.92	15,677.86
1,244.0000	COVANTA HOLDING CORP	20,165.24	20.6100	25,638.84	5,473.60
4,682.0000	COWEN GROUP INC	15,146.79	4.2200	19,758.04	4,611.25
32.0000	CRACKER BARREL OLD COUNTRY STO	1,555.52	99.5700	3,186.24	1,630.72



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388.0000	CRANE CO	18,197.20	74.3600	28,851.68	10,654.48
633.0000	CRAY INC	10,007.73	26.6000	16,837.80	6,830.07
875.0000	CREE INC	20,825.00	49.9500	43,706.25	22,881.25
2,006.0000	CROWN CASTLE INTERNATIONAL COR	78,143.19	74.2600	148,965.56	70,822.37
1,598.0000	CROWN HOLDINGS INC	50,231.48	49.7600	79,516.48	29,285.00
1,115.0000	CUBESMART	15,017.41	18.3200	20,426.80	5,409.39
477.0000	CUBIST PHARMACEUTICALS INC	17,038.44	69.8200	33,304.14	16,265.70
397.0000	CUBIST PHARMACEUTIC CVR W I	853.55	0.1160	46.05	807.50-
358.0000	CULLEN/FROST BANKERS INC	20,037.26	79.4200	28,432.36	8,395.10
345.0000	CUMMINS INC	39,099.36	154.2900	53,230.05	14,130.69
434.0000	CURTISS-WRIGHT CORP	14,975.69	65.5600	28,453.04	13,477.35
378.0000	CYTEC INDUSTRIES INC	20,041.56	105.4200	39,848.76	19,807.20
5,218.0000	DCT INDUSTRIAL TRUST INC	36,935.61	8.2100	42,839.78	5,904.17
2,602.0000	DDR CORP	33,588.36	17.6300	45,873.26	12,284.90
2,394.0000	DR HORTON INC	38,117.85	24.5800	58,844.52	20,726.67
280.0000	DST SYSTEMS INC	14,316.40	92.1700	25,807.60	11,491.20
1,346.0000	DTE ENERGY CO	56,159.70	77.8700	104,813.02	48,653.32



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344.0000	DSW INC	8,514.00	27.9400	9,611.36	1,097.36
1,772.0000	DANA HOLDING CORP	26,361.34	24.4200	43,272.24	16,910.90
4,548.0000	DANAHER CORP	157,557.51	78.7300	358,064.04	200,506.53
542.0000	DARLING INGREDIENTS INC	9,647.60	20.9000	11,327.80	1,680.20
872.0000	DAVITA HEALTHCARE PARTNERS INC	27,239.32	72.3200	63,063.04	35,823.72
327.0000	DEALERTRACK TECHNOLOGY INC	6,981.45	45.3400	14,826.18	7,844.73
2,046.0000	DEAN FOODS CO	34,758.44	17.5900	35,989.14	1,230.70
108.0000	DECKERS OUTDOOR CORP	5,114.88	86.3300	9,323.64	4,208.76
1,881.0000	DEERE & CO	79,713.96	90.5500	170,324.55	90,610.59
6,422.0000	DELTA AIR LINES INC	57,235.47	38.7200	248,659.84	191,424.37
409.0000	DELUXE CORP	9,627.86	58.5800	23,959.22	14,331.36
27,959.0000	DENDREON CORP	66,304.77	2.3000	64,305.70	1,999.07-
1,271.0000	DENTSPLY INTERNATIONAL INC	36,468.17	47.3500	60,181.85	23,713.68
831.0000	DEVON ENERGY CORP	51,705.98	79.4000	65,981.40	14,275.42
2,441.0000	DIAMONDROCK HOSPITALITY CO	23,699.60	12.8200	31,293.62	7,594.02
519.0000	DIEBOLD INC	15,564.81	40.1700	20,848.23	5,283.42
783.0000	DIGITAL REALTY TRUST INC	40,172.40	58.3200	45,664.56	5,492.16



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208.0000	DIGITALGLOBE INC	5,044.00	27.8000	5,782.40	738.40
357.0000	DIME COMMUNITY BANCSHARES INC	5,083.68	15.7900	5,637.03	553.35
327.0000	DILLARD'S INC	18,357.87	116.6100	38,131.47	19,773.60
123.0000	DINEEQUITY INC	6,157.38	79.4900	9,777.27	3,619.89
13,250.0000	WALT DISNEY CO/THE	407,122.70	85.7400	1,136,055.00	728,932.30
919.0000	DISCOVERY COMMUNICATIONS INC	37,173.99	74.2800	68,263.32	31,089.33
1,554.0000	DISH NETWORK CORP	38,127.40	65.0800	101,134.32	63,006.92
4,203.0000	DISCOVER FINANCIAL SERVICES	101,189.69	61.9800	260,501.94	159,312.25
3,366.0000	DIRECTV	105,577.58	85.0100	286,143.66	180,566.08
1,761.0000	DOLLAR GENERAL CORP	68,158.68	57.3600	101,010.96	32,852.28
2,063.0000	DOLLAR TREE INC	60,527.74	54.4600	112,350.98	51,823.24
4,650.0000	DOMINION RESOURCES INC/VA	179,534.18	71.5200	332,568.00	153,033.82
658.0000	DOMINO'S PIZZA INC	28,175.56	73.0900	48,093.22	19,917.66
530.0000	DOMTAR CORP	19,629.76	42.8500	22,710.50	3,080.74
1,062.0000	DONALDSON CO INC	25,287.78	42.3200	44,943.84	19,656.06
35.0000	DONEGAL GROUP INC	442.05	15.3000	535.50	93.45
1,055.0000	RR DONNELLEY & SONS CO	10,033.05	16.9600	17,892.80	7,859.75



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1,302.0000	DOUGLAS EMMETT INC	20,154.96	28.2200	36,742.44	16,587.48
1,483.0000	DOVER CORP	58,992.77	90.9500	134,878.85	75,886.08
7,069.0000	DOW CHEMICAL CO/THE	258,575.13	51.4600	363,770.74	105,195.61
137.0000	DRESSER-RAND GROUP INC	6,880.14	63.7300	8,731.01	1,850.87
214.0000	DREW INDUSTRIES INC	4,981.92	50.0100	10,702.14	5,720.22
409.0000	DRIL-QUIP INC	27,298.09	109.2400	44,679.16	17,381.07
7,178.0000	EI DU PONT DE NEMOURS & CO	311,369.52	65.4400	469,728.32	158,358.80
5,612.0000	DUKE ENERGY CORP NEW COM	297,827.76	74.1900	416,354.28	118,526.52
2,180.0000	DUKE REALTY CORP	25,549.60	18.1600	39,588.80	14,039.20
429.0000	DUN & BRADSTREET CORP	32,948.78	110.2000	47,275.80	14,327.02
1,071.0000	DUNKIN' BRANDS GROUP INC	34,657.56	45.8100	49,062.51	14,404.95
321.0000	DYCOM INDUSTRIES INC	4,798.95	31.3100	10,050.51	5,251.56
452.0000	DYNEGY INC/NEW	9,953.04	34.8000	15,729.60	5,776.56
15,675.0000	EMC CORP/MA	219,540.06	26.3400	412,879.50	193,339.44
265.0000	EMC INSURANCE GROUP INC	5,005.85	30.7800	8,156.70	3,150.85
3,580.0000	EOG RESOURCES INC	141,011.35	116.8600	418,358.80	277,347.45
710.0000	EQT CORP	37,470.08	106.9000	75,899.00	38,428.92



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371.0000	EPR PPTYS COM SH BEN INT	17,058.58	55.8700	20,727.77	3,669.19
172.0000	ERA GROUP INC	3,226.87	28.6800	4,932.96	1,706.09
3,298.0000	E*TRADE FINANCIAL CORP	29,418.16	21.2600	70,115.48	40,697.32
227.0000	EAGLE MATERIALS INC	14,862.68	94.2800	21,401.56	6,538.88
2,082.0000	EAST WEST BANCORP INC	36,155.90	34.9900	72,849.18	36,693.28
172.0000	EASTGROUP PROPERTIES INC	9,958.80	64.2300	11,047.56	1,088.76
893.0000	EASTMAN CHEMICAL CO	61,432.37	87.3500	78,003.55	16,571.18
8,344.0000	EBAY INC	249,015.44	50.0600	417,700.64	168,685.20
133.0000	ECHOSTAR CORP	4,983.51	52.9400	7,041.02	2,057.51
1,894.0000	ECOLAB INC	82,422.78	111.3400	210,877.96	128,455.18
3,178.0000	EDISON INTERNATIONAL	134,717.64	58.1100	184,673.58	49,955.94
296.0000	EDWARDS LIFESCIENCES CORP	16,996.32	85.8400	25,408.64	8,412.32
2,671.0000	ELECTRONIC ARTS INC	42,070.68	35.8700	95,808.77	53,738.09
309.0000	ELECTRONICS FOR IMAGING INC	5,101.59	45.2000	13,966.80	8,865.21
532.0000	EMCOR GROUP INC	15,119.44	44.5300	23,689.96	8,570.52
245.0000	EMERITUS CORP	4,912.25	31.6500	7,754.25	2,842.00
5,670.0000	EMERSON ELECTRIC CO	243,705.78	66.3600	376,261.20	132,555.42



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262.0000	EMPIRE DISTRICT ELECTRIC CO/TH	4,878.44	25.6800	6,728.16	1,849.72
220.0000	ENCORE WIRE CORP	5,108.40	49.0400	10,788.80	5,680.40
573.0000	ENERGEN CORP	31,497.81	88.8800	50,928.24	19,430.43
256.0000	ENERGIZER HOLDINGS INC	20,043.54	122.0300	31,239.68	11,196.14
329.0000	ENERSYS	12,202.61	68.7900	22,631.91	10,429.30
16.0000	ENPRO INDUSTRIES INC	714.88	73.1600	1,170.56	455.68
1,068.0000	ENTEGRIS INC	10,455.72	13.7450	14,679.66	4,223.94
1,693.0000	ENTERCOM COMMUNICATIONS CORP	10,346.09	10.7300	18,165.89	7,819.80
159.0000	ENTERGY CORP	10,080.60	82.0900	13,052.31	2,971.71
390.0000	ENTERPRISE FINANCIAL SERVICES	5,190.90	18.0600	7,043.40	1,852.50
1,211.0000	EQUIFAX INC	46,171.71	72.5400	87,845.94	41,674.23
235.0000	EQUINIX INC	23,874.74	210.0900	49,371.15	25,496.41
292.0000	EQUITY LIFESTYLE PROPERTIES IN	9,962.80	44.1600	12,894.72	2,931.92
2,624.0000	EQUITY RESIDENTIAL	133,955.13	63.0000	165,312.00	31,356.87
435.0000	ESSEX PROPERTY TRUST INC	63,210.18	184.9100	80,435.85	17,225.67
243.0000	ESTERLINE TECHNOLOGIES CORP	17,802.18	115.1200	27,974.16	10,171.98
242.0000	ETHAN ALLEN INTERIORS INC	5,055.38	24.7400	5,987.08	931.70



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195.0000	EURONET WORLDWIDE INC	2,932.80	48.2400	9,406.80	6,474.00
427.0000	EVERCORE PARTNERS INC	15,145.56	57.6400	24,612.28	9,466.72
625.0000	EXACT SCIENCES CORP	5,131.25	17.0300	10,643.75	5,512.50
931.0000	EXCEL TRUST INC	10,697.19	13.3300	12,410.23	1,713.04
4,062.0000	EXELON CORP	124,291.82	36.4800	148,181.76	23,889.94
1,464.0000	EXELIS INC	17,879.59	16.9800	24,858.72	6,979.13
2,005.0000	EXONE CO/THE	75,388.00	39.6200	79,438.10	4,050.10
856.0000	EXPEDIA INC	31,812.07	78.7600	67,418.56	35,606.49
5,364.0000	EXPRESS SCRIPTS HOLDING CO	178,832.95	69.3300	371,886.12	193,053.17
28,993.0000	EXXON MOBIL CORP	1,890,265.69	100.6800	2,919,015.24	1,028,749.55
308.0000	FEI CO	11,201.96	90.7300	27,944.84	16,742.88
667.0000	FMC TECHNOLOGIES INC	14,307.98	61.0700	40,733.69	26,425.71
757.0000	FMC CORP	45,804.07	71.1900	53,890.83	8,086.76
3,316.0000	FNB CORP/PA	33,524.76	12.8200	42,511.12	8,986.36
528.0000	FXCM INC	5,169.12	14.9600	7,898.88	2,729.76
165.0000	FTD COS INC	3,787.68	31.7900	5,245.35	1,457.67
10,403.0000	FACEBOOK INC	247,871.86	67.2900	700,017.87	452,146.01



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317.0000	FAIR ISAAC CORP	9,189.83	63.7600	20,211.92	11,022.09
123.0000	FARO TECHNOLOGIES INC	5,098.35	49.1200	6,041.76	943.41
1,710.0000	FASTENAL CO	54,725.94	49.4900	84,627.90	29,901.96
702.0000	FEDERAL-MOGUL HOLDINGS CORPORATION	7,083.18	20.2300	14,201.46	7,118.28
420.0000	FEDERAL REALTY INVESTMENT TRUS	35,232.06	120.9200	50,786.40	15,554.34
208.0000	FEDERATED INVESTORS INC	4,915.04	30.9200	6,431.36	1,516.32
2,312.0000	FEDEX CORP	239,003.42	151.3800	349,990.56	110,987.14
3,702.0000	FELCOR LODGING TRUST INC	21,175.44	10.5100	38,908.02	17,732.58
1,561.0000	FERRO CORP	8,366.96	12.5600	19,606.16	11,239.20
325.0000	F5 NETWORKS INC	20,198.75	111.4400	36,218.00	16,019.25
2,090.0000	FIDELITY NATIONAL INFORMATION	49,394.94	54.7400	114,406.60	65,011.66
1,129.0000	FIDELITY NATIONAL FINANCIAL IN	28,237.04	32.7600	36,986.04	8,749.00
5,972.0000	FIFTH THIRD BANCORP	90,216.50	21.3500	127,502.20	37,285.70
305.0000	FINANCIAL ENGINES INC	7,667.70	45.2800	13,810.40	6,142.70
311.0000	FINANCIAL INSTITUTIONS INC	5,010.21	23.4200	7,283.62	2,273.41
713.0000	FINISAR CORP	11,457.91	19.7500	14,081.75	2,623.84



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627.0000	FIRST AMERICAN FINANCIAL CORP	9,630.72	27.7900	17,424.33	7,793.61
966.0000	FIRST BUSEY CORP	5,119.80	5.8100	5,612.46	492.66
249.0000	FIRST CASH FINANCIAL SERVICES	9,691.08	57.5900	14,339.91	4,648.83
37.0000	FIRST CITIZENS BANCSHARES INC/	6,464.27	245.0000	9,065.00	2,600.73
404.0000	FIRST CONNECTICUT BANCORP INC/	5,684.28	16.0500	6,484.20	799.92
236.0000	FIRST DEFIANCE FINANCIAL CORP	4,998.48	28.7000	6,773.20	1,774.72
500.0000	FIRST FINANCIAL BANKSHARES INC	8,355.00	31.3700	15,685.00	7,330.00
598.0000	FIRST HORIZON NATIONAL CORP	6,003.10	11.8600	7,092.28	1,089.18
1,295.0000	FIRST INDUSTRIAL REALTY TRUST	16,776.50	18.8400	24,397.80	7,621.30
593.0000	FIRST MIDWEST BANCORP INC/IL	6,955.89	17.0300	10,098.79	3,142.90
509.0000	FIRST REPUBLIC BANK/CA	19,738.42	54.9900	27,989.91	8,251.49
470.0000	FIRST SOLAR INC	17,165.22	71.0600	33,398.20	16,232.98
245.0000	1ST SOURCE CORP	4,922.05	30.6200	7,501.90	2,579.85
824.0000	1ST UNITED BANCORP INC/BOCA RA	5,182.96	8.6100	7,094.64	1,911.68
2,284.0000	FISERV INC	53,899.55	60.3200	137,770.88	83,871.33
192.0000	FIRSTMERIT CORP	3,081.60	19.7500	3,792.00	710.40
735.0000	FLAGSTAR BANCORP INC	9,929.85	18.1000	13,303.50	3,373.65



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334.0000	FLEETCOR TECHNOLOGIES INC	17,798.86	131.8000	44,021.20	26,222.34
646.0000	FLOTEK INDUSTRIES INC	4,921.03	32.1600	20,775.36	15,854.33
1,553.0000	FLUOR CORP	60,530.81	76.9000	119,425.70	58,894.89
751.0000	FLOWERS FOODS INC	9,953.25	21.0800	15,831.08	5,877.83
612.0000	FLOWSERVE CORP	33,155.28	74.3500	45,502.20	12,346.92
1,691.0000	FOOT LOCKER INC	45,710.75	50.7200	85,767.52	40,056.77
27,196.0000	FORD MOTOR CO	237,432.41	17.2400	468,859.04	231,426.63
1,388.0000	FOREST CITY ENTERPRISES INC	20,542.40	19.8700	27,579.56	7,037.16
1,786.0000	FOREST LABORATORIES INC	65,655.87	99.0000	176,814.00	111,158.13
305.0000	FORESTAR GROUP INC	4,901.35	19.0900	5,822.45	921.10
564.0000	FORTINET INC	10,180.20	25.1300	14,173.32	3,993.12
1,817.0000	FORTUNE BRANDS HOME & SECURITY	47,665.11	39.9300	72,552.81	24,887.70
234.0000	FORWARD AIR CORP	7,607.34	47.8500	11,196.90	3,589.56
371.0000	FOSSIL GROUP INC	20,642.44	104.5200	38,776.92	18,134.48
230.0000	FRANKLIN ELECTRIC CO INC	5,146.25	40.3300	9,275.90	4,129.65
3,354.0000	FRANKLIN RESOURCES INC	121,963.63	57.8400	193,995.36	72,031.73
6,419.0000	FREEMPORT-MCMORAN COPPER & GOLD	204,099.89	36.5000	234,293.50	30,193.61



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13,041.0000	FRONTIER COMMUNICATIONS CORP	60,771.06	5.8400	76,159.44	15,388.38
393.0000	HB FULLER CO	9,211.92	48.1000	18,903.30	9,691.38
3,539.0000	FULTON FINANCIAL CORP	35,391.42	12.3900	43,848.21	8,456.79
854.0000	FURMANITE CORP	5,055.68	11.6400	9,940.56	4,884.88
6,816.0000	FUSION-IO INC	75,295.98	11.3000	77,020.80	1,724.82
157.0000	G&K SERVICES INC	4,879.56	52.0700	8,174.99	3,295.43
109.0000	GAMCO INVESTORS INCORPORATED CLASS A	4,884.29	83.0500	9,052.45	4,168.16
369.0000	GATX CORP	13,379.94	66.9400	24,700.86	11,320.92
594.0000	GEO GROUP INC/THE	13,927.34	35.7300	21,223.62	7,296.28
540.0000	GNC HOLDINGS INC	14,476.70	34.1000	18,414.00	3,937.30
986.0000	GSV CAPITAL CORP	9,771.26	10.5700	10,422.02	650.76
296.0000	G -III APPAREL GROUP LTD	9,732.48	81.6600	24,171.36	14,438.88
744.0000	ARTHUR J GALLAGHER & CO	30,117.56	46.6000	34,670.40	4,552.84
513.0000	GAMING AND LEISURE PROPERTIES	15,821.80	33.9700	17,426.61	1,604.81
987.0000	GAMESTOP CORP	19,923.30	40.4700	39,943.89	20,020.59
1,921.0000	GANNETT CO INC	25,645.35	31.3100	60,146.51	34,501.16



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2,761.0000	GAP INC/THE	59,432.51	41.5700	114,774.77	55,342.26
1,071.0000	GARTNER INC	43,665.21	70.5200	75,526.92	31,861.71
2,114.0000	GENERAL DYNAMICS CORP	152,205.04	116.5500	246,386.70	94,181.66
53,252.0000	GENERAL ELECTRIC CO	1,577,878.42	26.2800	1,399,462.56	178,415.86-
3,185.0000	GENERAL GROWTH PROPERTIES INC	38,300.88	23.5600	75,038.60	36,737.72
4,924.0000	GENERAL MILLS INC	140,195.14	52.5400	258,706.96	118,511.82
5,970.0000	GENERAL MOTORS CO	176,165.52	36.3000	216,711.00	40,545.48
189.0000	GENESCO INC	9,642.78	82.1300	15,522.57	5,879.79
331.0000	GENESEE & WYOMING INC	23,197.51	105.0000	34,755.00	11,557.49
1,030.0000	GENTEX CORP	20,424.90	29.0900	29,962.70	9,537.80
1,251.0000	GENUINE PARTS CO	54,529.71	87.8000	109,837.80	55,308.09
4,758.0000	GENWORTH FINANCIAL INC	40,302.00	17.4000	82,789.20	42,487.20
327.0000	GENTHERM INC COM	5,310.48	44.4500	14,535.15	9,224.67
454.0000	GERBER SCIENTIFIC INC COM ESCROW	0.00	0.0000	0.00	0.00
559.0000	GETTY REALTY CORP	10,000.51	19.0800	10,665.72	665.21
457.0000	GIBRALTAR INDUSTRIES INC	4,958.45	15.5100	7,088.07	2,129.62



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3,765.0000	GIGAMON INC	72,702.15	19.1400	72,062.10	640.05-
10,368.0000	GILEAD SCIENCES INC	179,028.30	82.9100	859,610.88	680,582.58
572.0000	GLACIER BANCORP INC	7,424.56	28.3800	16,233.36	8,808.80
534.0000	GLADSTONE CAPITAL CORP	4,971.54	10.0600	5,372.04	400.50
331.0000	PH GLATFELTER CO	4,981.55	26.5300	8,781.43	3,799.88
49.0000	GLOBAL CASH ACCESS HOLDINGS IN	355.74	8.9000	436.10	80.36
794.0000	GLIMCHER REALTY TRUST	7,352.44	10.8300	8,599.02	1,246.58
549.0000	GLOBAL PAYMENTS INC	25,048.56	72.8500	39,994.65	14,946.09
1,193.0000	GOLDMAN SACHS GROUP INC/THE	161,188.65	167.4400	199,755.92	38,567.27
346.0000	GOLUB CAPITAL BDC INC	5,241.90	17.7000	6,124.20	882.30
2,015.0000	GOODYEAR TIRE & RUBBER CO/THE	29,500.61	27.7800	55,976.70	26,476.09
1,471.0000	GOOGLE INC	297,913.64	584.6700	860,049.57	562,135.93
1,811.0000	GOOGLE INC	385,029.74	575.2800	1,041,832.08	656,802.34
767.0000	WR GRACE & CO	37,269.84	94.5300	72,504.51	35,234.67
450.0000	GRACO INC	22,596.88	78.0800	35,136.00	12,539.12
1,313.0000	GRAFTECH INTERNATIONAL LTD	9,703.07	10.4600	13,733.98	4,030.91
12.0000	GRAHAM HOLDINGS CO	4,868.88	718.1100	8,617.32	3,748.44



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3,803.0000	GRAMERCY PROPERTY TRUST INC	9,545.53	6.0500	23,008.15	13,462.62
209.0000	GRAND CANYON EDUCATION INC	4,817.45	45.9700	9,607.73	4,790.28
308.0000	GRANITE CONSTRUCTION INC	7,527.52	35.9800	11,081.84	3,554.32
1,271.0000	GRAPHIC PACKAGING HOLDING CO	6,749.01	11.7000	14,870.70	8,121.69
1,175.0000	GREAT PLAINS ENERGY INC	22,865.50	26.8700	31,572.25	8,706.75
187.0000	GREATBATCH INC	4,934.93	49.0600	9,174.22	4,239.29
715.0000	GREEN DOT CORP	9,066.20	18.9800	13,570.70	4,504.50
485.0000	GREEN PLAINS INC	4,951.85	32.8700	15,941.95	10,990.10
249.0000	GREENBRIER COS INC	4,932.69	57.6000	14,342.40	9,409.71
258.0000	GREENHILL & CO INC	10,273.56	49.2500	12,706.50	2,432.94
511.0000	GRIFFON CORP	4,997.58	12.4000	6,336.40	1,338.82
111.0000	GROUP 1 AUTOMOTIVE INC	4,362.30	84.3100	9,358.41	4,996.11
2,968.0000	GROUPON INC	13,118.56	6.6200	19,648.16	6,529.60
897.0000	GULF COAST ULTRA DEEP ROYALTY	1,569.75	2.9000	2,601.30	1,031.55
123.0000	GULFMARK OFFSHORE INC	5,034.39	45.1800	5,557.14	522.75
406.0000	GULFPORT ENERGY CORP	12,569.12	62.8000	25,496.80	12,927.68
379.0000	H&E EQUIPMENT SERVICES INC	4,839.83	36.3400	13,772.86	8,933.03



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904.0000	HCC INSURANCE HOLDINGS INC	27,933.60	48.9400	44,241.76	16,308.16
3,636.0000	HCP INC	119,369.88	41.3800	150,457.68	31,087.80
700.0000	HFF INC	9,604.00	37.1900	26,033.00	16,429.00
356.0000	HNI CORP	8,590.28	39.1100	13,923.16	5,332.88
340.0000	HAIN CELESTIAL GROUP INC/THE	14,843.02	88.7400	30,171.60	15,328.58
7,272.0000	HALLIBURTON CO	209,288.15	71.0100	516,384.72	307,096.57
758.0000	HALOZYME THERAPEUTICS INC	4,972.48	9.8800	7,489.04	2,516.56
767.0000	HANCOCK HOLDING CO	24,537.01	35.3200	27,090.44	2,553.43
1,131.0000	HANESBRANDS INC	34,144.62	98.4400	111,335.64	77,191.02
1,011.0000	HANGER INC	22,848.60	31.4500	31,795.95	8,947.35
595.0000	HANOVER INSURANCE GROUP INC/TH	24,926.93	63.1500	37,574.25	12,647.32
454.0000	HARMAN INTERNATIONAL INDUSTRIE	19,971.35	107.4300	48,773.22	28,801.87
1,011.0000	HARRIS CORP	39,272.70	75.7500	76,583.25	37,310.55
3,133.0000	HARTFORD FINANCIAL SERVICES GR	62,255.76	35.8100	112,192.73	49,936.97
790.0000	HASBRO INC	17,743.01	53.0500	41,909.50	24,166.49
879.0000	HAWAIIAN HOLDINGS INC	5,054.25	13.7100	12,051.09	6,996.84
251.0000	HAWAIIAN TELCOM HOLDCO INC	5,022.51	28.6100	7,181.11	2,158.60



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756.0000	HEALTHSOUTH CORP	18,711.00	35.8700	27,117.72	8,406.72
579.0000	HEALTHCARE REALTY TRUST INC	11,857.92	25.4200	14,718.18	2,860.26
1,387.0000	HEALTH CARE REIT INC	51,110.95	62.6700	86,923.29	35,812.34
753.0000	HEALTH NET INC	20,044.86	41.5400	31,279.62	11,234.76
435.0000	HEALTHSTREAM INC	9,922.35	24.3000	10,570.50	648.15
912.0000	HEALTHCARE TRUST OF AMERICA IN	10,177.92	12.0400	10,980.48	802.56
307.0000	HEARTLAND PAYMENT SYSTEMS INC	6,275.08	41.2100	12,651.47	6,376.39
518.0000	HEICO CORP	17,653.44	51.9400	26,904.92	9,251.48
366.0000	HEIDRICK & STRUGGLES INTERNATI	4,933.68	18.5000	6,771.00	1,837.32
843.0000	HELIX ENERGY SOLUTIONS GROUP I	13,471.14	26.3100	22,179.33	8,708.19
758.0000	HELMERICH & PAYNE INC	30,716.06	116.1100	88,011.38	57,295.32
687.0000	JACK HENRY & ASSOCIATES INC	20,129.10	59.4300	40,828.41	20,699.31
492.0000	HERCULES TECHNOLOGY GROWTH CAP	5,072.52	16.1600	7,950.72	2,878.20
905.0000	HERITAGE FINANCIAL CORP/WA	12,758.94	16.0900	14,561.45	1,802.51
363.0000	HERITAGE FINANCIAL GROUP INC	4,965.84	19.8300	7,198.29	2,232.45
2,965.0000	HERSHA HOSPITALITY TRUST	16,203.44	6.7100	19,895.15	3,691.71
265.0000	HERSHEY CO/THE	12,606.05	97.3700	25,803.05	13,197.00



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2,003.0000	HERTZ GLOBAL HOLDINGS INC	20,871.26	28.0300	56,144.09	35,272.83
2,093.0000	HESS CORP	95,894.20	98.8900	206,976.77	111,082.57
5,060.0000	HEWLETT-PACKARD CO	82,607.36	33.6800	170,420.80	87,813.44
779.0000	HEXCEL CORP	16,335.63	40.9000	31,861.10	15,525.47
218.0000	HIBBETT SPORTS INC	8,539.06	54.1700	11,809.06	3,270.00
574.0000	HIGHWOODS PROPERTIES INC	18,620.56	41.9500	24,079.30	5,458.74
154.0000	HILL-ROM HOLDINGS INC	5,069.68	41.5100	6,392.54	1,322.86
268.0000	HILLENBRAND INC	6,362.32	32.6200	8,742.16	2,379.84
588.0000	HOLLYFRONTIER CORP	16,166.74	43.6900	25,689.72	9,522.98
2,246.0000	HOLOGIC INC	41,710.86	25.3500	56,936.10	15,225.24
120.0000	HOME BANCSHARES INC/AR	1,416.00	32.8200	3,938.40	2,522.40
9,922.0000	HOME DEPOT INC/THE	363,621.46	80.9600	803,285.12	439,663.66
311.0000	HOME PROPERTIES INC	18,442.30	63.9600	19,891.56	1,449.26
6,180.0000	HONEYWELL INTERNATIONAL INC	255,859.42	92.9500	574,431.00	318,571.58
331.0000	HORACE MANN EDUCATORS CORP	4,951.76	31.2700	10,350.37	5,398.61
334.0000	HORMEL FOODS CORP	10,243.10	49.3500	16,482.90	6,239.80
4,386.0000	HORIZON PHARMA INC	10,570.26	15.8200	69,386.52	58,816.26



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192.0000	HORNBECK OFFSHORE SERVICES INC	4,809.60	46.9200	9,008.64	4,199.04
433.0000	HORSEHEAD HOLDING CORP	5,139.71	18.2600	7,906.58	2,766.87
1,070.0000	HOSPITALITY PROPERTIES TRUST	23,775.40	30.4000	32,528.00	8,752.60
969.0000	HOSPIRA INC	36,606.79	51.3700	49,777.53	13,170.74
4,941.0000	HOST HOTELS & RESORTS INC	78,640.77	22.0100	108,751.41	30,110.64
65.0000	HOWARD HUGHES CORP/THE	5,006.30	157.8300	10,258.95	5,252.65
293.0000	HUB GROUP INC	10,600.74	50.4000	14,767.20	4,166.46
662.0000	HUBBELL INC	46,259.11	123.1500	81,525.30	35,266.19
3,782.0000	HUDSON CITY BANCORP INC	22,465.08	9.8300	37,177.06	14,711.98
1,207.0000	HUMANA INC	72,400.77	127.7200	154,158.04	81,757.27
727.0000	JB HUNT TRANSPORT SERVICES INC	33,238.44	73.7800	53,638.06	20,399.62
6,896.0000	HUNTINGTON BANCSHARES INC/OH	36,341.92	9.5400	65,787.84	29,445.92
434.0000	HUNTINGTON INGALLS INDUSTRIES	16,354.58	94.5900	41,052.06	24,697.48
1,660.0000	HUNTSMAN CORP	20,517.60	28.1000	46,646.00	26,128.40
165.0000	HURON CONSULTING GROUP INC	4,851.00	70.8200	11,685.30	6,834.30
352.0000	HYATT HOTELS CORP	13,819.52	60.9800	21,464.96	7,645.44
492.0000	IDT CORP	4,342.85	17.4200	8,570.64	4,227.79



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122.0000	IAC/INTERACTIVECORP	5,002.00	69.2300	8,446.06	3,444.06
198.0000	ICF INTERNATIONAL INC	4,950.00	35.3600	7,001.28	2,051.28
202.0000	IPG PHOTONICS CORP	8,580.96	68.8000	13,897.60	5,316.64
2,669.0000	ISTAR FINANCIAL INC	20,312.66	14.9800	39,981.62	19,668.96
1,813.0000	ITT EDUCATIONAL SERVICES INC	28,578.25	16.6900	30,258.97	1,680.72
174.0000	IBERIABANK CORP	9,824.04	69.1900	12,039.06	2,215.02
732.0000	ITT CORP	14,239.70	48.1000	35,209.20	20,969.50
580.0000	ICONIX BRAND GROUP INC	13,386.40	42.9400	24,905.20	11,518.80
388.0000	IDACORP INC	18,620.12	57.8300	22,438.04	3,817.92
659.0000	IDEX CORP	28,666.50	80.7400	53,207.66	24,541.16
389.0000	IDEXX LABORATORIES INC	30,505.88	133.5700	51,958.73	21,452.85
321.0000	IGATE CORP	5,001.18	36.3900	11,681.19	6,680.01
3,477.0000	ILLINOIS TOOL WORKS INC	156,732.38	87.5600	304,446.12	147,713.74
597.0000	IMMUNOGEN INC	6,955.05	11.8500	7,074.45	119.40
244.0000	IMPAX LABORATORIES INC	4,933.68	29.9900	7,317.56	2,383.88
1,321.0000	INCYTE CORP LTD	22,852.40	56.4400	74,557.24	51,704.84
190.0000	INDEPENDENT BANK CORP/ROCKLAND	4,932.40	38.3800	7,292.20	2,359.80



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326.0000	INFORMATICA CORP	9,936.48	35.6500	11,621.90	1,685.42
831.0000	INFINERA CORP	5,476.29	9.2000	7,645.20	2,168.91
301.0000	INGLES MARKETS INC	4,809.98	26.3500	7,931.35	3,121.37
1,280.0000	INGRAM MICRO INC	22,220.80	29.2100	37,388.80	15,168.00
608.0000	INGREDION INC	29,897.31	75.0400	45,624.32	15,727.01
613.0000	INLAND REAL ESTATE CORP	5,357.62	10.6300	6,516.19	1,158.57
305.0000	INSIGHT ENTERPRISES INC	5,072.15	30.7400	9,375.70	4,303.55
106.0000	INNOPHOS HOLDINGS INC	5,185.52	57.5700	6,102.42	916.90
176.0000	INSPERITY INC	5,026.56	33.0000	5,808.00	781.44
245.0000	INSULET CORP	5,049.45	39.6700	9,719.15	4,669.70
1,178.0000	INTEGRATED DEVICE TECHNOLOGY I	8,852.67	15.4600	18,211.88	9,359.21
567.0000	INTEGRATED SILICON SOLUTION IN	5,165.37	14.7700	8,374.59	3,209.22
37,847.0000	INTEL CORP	790,445.89	30.9000	1,169,472.30	379,026.41
345.0000	INTEGRYS ENERGY GROUP INC	17,786.25	71.1300	24,539.85	6,753.60
1,471.0000	INTERACTIVE BROKERS GROUP INC	24,094.98	23.2900	34,259.59	10,164.61
150.0000	INTERACTIVE INTELLIGENCE GROUP INC	5,083.50	56.1300	8,419.50	3,336.00



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696.0000	INTERCONTINENTAL EXCHANGE INC	105,154.35	188.9000	131,474.40	26,320.05
422.0000	INTERNATIONAL BANCSHARES CORP	6,802.64	27.0000	11,394.00	4,591.36
6,868.0000	INTERNATIONAL BUSINESS MACHINE	564,204.14	181.2700	1,244,962.36	680,758.22
555.0000	INTERNATIONAL FLAVORS & FRAGRA	22,017.41	104.2800	57,875.40	35,857.99
3,548.0000	INTERNATIONAL PAPER CO	124,955.21	50.4700	179,067.56	54,112.35
503.0000	INTERNATIONAL RECTIFIER CORP	10,195.81	27.9000	14,033.70	3,837.89
433.0000	INTERNATIONAL SHIPHOLDING CORP	8,997.74	22.9200	9,924.36	926.62
4,606.0000	INTERPUBLIC GROUP OF COS INC/T	46,744.51	19.5100	89,863.06	43,118.55
377.0000	INTERVAL LEISURE GROUP INC	5,051.80	21.9400	8,271.38	3,219.58
230.0000	INTUITIVE SURGICAL INC	63,537.98	411.8000	94,714.00	31,176.02
1,521.0000	INTUIT INC	49,612.29	80.5300	122,486.13	72,873.84
881.0000	INVENSENSE INC	9,417.89	22.6900	19,989.89	10,572.00
938.0000	INVESTORS BANCORP INC NEW COM	5,116.70	11.0500	10,364.90	5,248.20
9,019.0000	IRIDIUM COMMUNICATIONS INC	74,767.51	8.4600	76,300.74	1,533.23
1,541.0000	IRON MOUNTAIN INC	38,193.69	35.4500	54,628.45	16,434.76
792.0000	ISIS PHARMACEUTICALS INC	7,080.48	34.4500	27,284.40	20,203.92
1,056.0000	ITC HOLDINGS CORP	26,418.16	36.4800	38,522.88	12,104.72



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324.0000	ITRON INC	11,877.84	40.5500	13,138.20	1,260.36
28,559.0000	JPMORGAN CHASE & CO	1,164,880.99	57.6200	1,645,569.58	480,688.59
970.0000	JMP GROUP INC	5,984.90	7.5700	7,342.90	1,358.00
1,145.0000	JABIL CIRCUIT INC	20,232.15	20.9000	23,930.50	3,698.35
350.0000	JACK IN THE BOX INC	10,024.00	59.8400	20,944.00	10,920.00
960.0000	JACOBS ENGINEERING GROUP INC	41,166.18	53.2800	51,148.80	9,982.62
2,485.0000	JANUS CAPITAL GROUP INC	19,686.26	12.4800	31,012.80	11,326.54
1,120.0000	JARDEN CORP	25,036.23	59.3500	66,472.00	41,435.77
4,035.0000	JETBLUE AIRWAYS CORP	24,492.45	10.8500	43,779.75	19,287.30
17,883.0000	JOHNSON & JOHNSON	1,156,238.25	104.6200	1,870,919.46	714,681.21
5,778.0000	JOHNSON CONTROLS INC	142,173.50	49.9300	288,495.54	146,322.04
329.0000	JONES LANG LASALLE INC	25,378.52	126.3900	41,582.31	16,203.79
442.0000	JOY GLOBAL INC	25,870.26	61.5800	27,218.36	1,348.10
507.0000	J2 GLOBAL INC	14,786.94	50.8600	25,786.02	10,999.08
4,433.0000	JUNIPER NETWORKS INC	76,671.73	24.5400	108,785.82	32,114.09
903.0000	KBR INC	20,489.07	23.8500	21,536.55	1,047.48
296.0000	KCG HOLDINGS INC	3,108.11	11.8800	3,516.48	408.37



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1,474.0000	KLA-TENCOR CORP	67,483.26	72.6400	107,071.36	39,588.10
130.0000	KAISER ALUMINUM CORP	6,880.90	72.8700	9,473.10	2,592.20
25.0000	KANSAS CITY LIFE INSURANCE CO	933.75	45.4800	1,137.00	203.25
966.0000	KANSAS CITY SOUTHERN	51,883.03	107.5100	103,854.66	51,971.63
646.0000	KAPSTONE PAPER AND PACKAGING C	5,151.85	33.1300	21,401.98	16,250.13
622.0000	KOHLBERG CAPITAL CORP	4,963.68	8.4900	5,280.78	317.10
1,848.0000	KELLOGG CO	92,249.65	65.7000	121,413.60	29,163.95
302.0000	KELLY SERVICES INC	4,925.62	17.1700	5,185.34	259.72
2,336.0000	KEMET CORP	9,647.68	5.7500	13,432.00	3,784.32
713.0000	KEMPER CORPORATION	20,151.16	36.8600	26,281.18	6,130.02
688.0000	KEURIG GREEN MOUNTAIN INC	23,103.00	124.6100	85,731.68	62,628.68
2,198.0000	KEY ENERGY SERVICES INC	14,503.93	9.1400	20,089.72	5,585.79
5,132.0000	KEYCORP	46,342.19	14.3300	73,541.56	27,199.37
465.0000	KILROY REALTY CORP	17,693.25	62.2800	28,960.20	11,266.95
2,824.0000	KIMBERLY-CLARK CORP	184,603.18	111.2200	314,085.28	129,482.10
1,741.0000	KIMCO REALTY CORP	33,937.94	22.9800	40,008.18	6,070.24
2,449.0000	KINDER MORGAN INC/DELAWARE	71,529.85	36.2600	88,800.74	17,270.89



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274.0000	KIRBY CORP	17,909.37	117.1400	32,096.36	14,186.99
1,071.0000	KITE REALTY GROUP TRUST	4,905.18	6.1400	6,575.94	1,670.76
485.0000	KNIGHT TRANSPORTATION INC	7,827.90	23.7700	11,528.45	3,700.55
741.0000	KNOWLES CORP	11,611.84	30.7400	22,778.34	11,166.50
2,157.0000	KODIAK OIL & GAS CORP	14,111.48	14.5500	31,384.35	17,272.87
447.0000	KOHL'S CORP	19,693.26	52.6800	23,547.96	3,854.70
164.0000	KOPPERS HOLDINGS INC	5,905.64	38.2500	6,273.00	367.36
374.0000	KORN/FERRY INTERNATIONAL	7,954.98	29.3700	10,984.38	3,029.40
4,520.0000	KRAFT FOODS GROUP INC	138,438.46	59.9500	270,974.00	132,535.54
1,748.0000	KRATOS DEFENSE & SECURITY SOLU	10,068.48	7.8000	13,634.40	3,565.92
489.0000	KRATON PERFORMANCE POLYMERS IN	9,579.51	22.3900	10,948.71	1,369.20
562.0000	KRISPY KREME DOUGHNUTS INC	5,136.68	15.9800	8,980.76	3,844.08
4,807.0000	KROGER CO/THE	109,978.54	49.4300	237,610.01	127,631.47
573.0000	KULICKE & SOFFA INDUSTRIES INC	6,314.46	14.2600	8,170.98	1,856.52
2,011.0000	L BRANDS INC	54,585.17	58.6600	117,965.26	63,380.09
601.0000	LPL FINANCIAL HOLDINGS INC	20,265.72	49.7400	29,893.74	9,628.02
780.0000	L-3 COMMUNICATIONS HOLDINGS IN	56,528.55	120.7500	94,185.00	37,656.45



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515.0000	LA-Z-BOY INC	4,830.70	23.1700	11,932.55	7,101.85
404.0000	LABORATORY CORP OF AMERICA HOL	27,033.74	102.4000	41,369.60	14,335.86
246.0000	LACLEDE GROUP INC/THE	9,972.84	48.5500	11,943.30	1,970.46
5,882.0000	LADENBURG THALMANN FINANCIAL S	9,764.12	3.1500	18,528.30	8,764.18
968.0000	LAKELAND BANCORP INC	8,630.79	10.8000	10,454.40	1,823.61
232.0000	LAKELAND FINANCIAL CORP	5,131.84	38.1600	8,853.12	3,721.28
1,272.0000	LAM RESEARCH CORP	31,206.40	67.5800	85,961.76	54,755.36
837.0000	LAMAR ADVERTISING CO	29,927.49	53.0000	44,361.00	14,433.51
151.0000	LANCASTER COLONY CORP	9,917.68	95.1600	14,369.16	4,451.48
381.0000	LANDSTAR SYSTEM INC	17,145.00	64.0000	24,384.00	7,239.00
2,610.0000	LAS VEGAS SANDS CORP	85,902.36	76.2200	198,934.20	113,031.84
677.0000	LASALLE HOTEL PROPERTIES	17,101.02	35.2900	23,891.33	6,790.31
903.0000	LEAR CORP	45,129.60	89.3200	80,655.96	35,526.36
1,136.0000	LEGGETT & PLATT INC	26,003.04	34.2800	38,942.08	12,939.04
783.0000	LEGG MASON INC	23,191.49	51.3100	40,175.73	16,984.24
105.0000	LEIDOS HLDGS INC	3,431.35	38.3400	4,025.70	594.35
1,519.0000	LENNAR CORP	57,752.38	41.9800	63,767.62	6,015.24



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514.0000	LENNOX INTERNATIONAL INC	23,730.67	89.5700	46,038.98	22,308.31
290.0000	LEUCADIA NATIONAL CORP	6,472.78	26.2200	7,603.80	1,131.02
444.0000	LEVEL 3 COMMUNICATIONS INC	9,861.24	43.9100	19,496.04	9,634.80
2,338.0000	LEXINGTON REALTY TRUST	18,796.68	11.0100	25,741.38	6,944.70
194.0000	LEXMARK INTERNATIONAL INC	5,329.18	48.1600	9,343.04	4,013.86
336.0000	LIBBEY INC	4,952.64	26.6400	8,951.04	3,998.40
5,023.0000	LIBERTY INTERACTIVE CORP	69,116.82	29.3600	147,475.28	78,358.46
372.0000	LIBERTY VENTURES	6,881.75	73.8000	27,453.60	20,571.85
981.0000	LIBERTY PROPERTY TRUST	30,411.00	37.9300	37,209.33	6,798.33
544.0000	LIFEPOINT HOSPITALS INC	20,410.88	62.1000	33,782.40	13,371.52
1,851.0000	ELI LILLY & CO	85,083.55	62.1700	115,076.67	29,993.12
622.0000	LINCOLN ELECTRIC HOLDINGS INC	32,375.10	69.8800	43,465.36	11,090.26
1,644.0000	LINCOLN NATIONAL CORP	47,529.53	51.4400	84,567.36	37,037.83
100.0000	LINDSAY CORP	6,217.00	84.4700	8,447.00	2,230.00
1,444.0000	LINEAR TECHNOLOGY CORP	46,652.71	47.0700	67,969.08	21,316.37
609.0000	LINKEDIN CORP	64,314.33	171.4700	104,425.23	40,110.90
1,500.0000	LIONS GATE ENTERTAINMENT CORP	23,625.00	28.5800	42,870.00	19,245.00



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181.0000	LITTELFUSE INC	9,973.10	92.9500	16,823.95	6,850.85
1,122.0000	LIVE NATION ENTERTAINMENT INC	12,285.90	24.6900	27,702.18	15,416.28
62.0000	LOCKHEED MARTIN CORP	10,088.02	160.7300	9,965.26	122.76-
2,396.0000	LOEWS CORP	90,892.26	44.0100	105,447.96	14,555.70
3,300.0000	LORILLARD INC	77,993.85	60.9700	201,201.00	123,207.15
8,938.0000	LOWE'S COS INC	255,637.33	47.9900	428,934.62	173,297.29
390.0000	LUMBER LIQUIDATORS HOLDINGS IN	13,968.60	75.9500	29,620.50	15,651.90
781.0000	M&T BANK CORP	71,835.59	124.0500	96,883.05	25,047.46
433.0000	MB FINANCIAL INC	8,227.00	27.0500	11,712.65	3,485.65
299.0000	MDC HOLDINGS INC	7,630.48	30.2900	9,056.71	1,426.23
1,153.0000	MDU RESOURCES GROUP INC	25,303.27	35.1000	40,470.30	15,167.03
882.0000	MGE ENERGY INC	25,174.38	39.5100	34,847.82	9,673.44
2,020.0000	MGIC INVESTMENT CORP	10,140.40	9.2400	18,664.80	8,524.40
2,813.0000	MGM RESORTS INTERNATIONAL	31,591.18	26.4000	74,263.20	42,672.02
416.0000	MKS INSTRUMENTS INC	10,437.44	31.2400	12,995.84	2,558.40
138.0000	MSA SAFETY INC	4,854.84	57.4800	7,932.24	3,077.40
352.0000	MSC INDUSTRIAL DIRECT CO	22,943.36	95.6400	33,665.28	10,721.92



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954.0000	MSCI INC	34,965.92	45.8500	43,740.90	8,774.98
90.0000	MWI VETERINARY SUPPLY INC	9,816.30	141.9900	12,779.10	2,962.80
215.0000	MYR GROUP INC	5,061.10	25.3300	5,445.95	384.85
1,124.0000	MACERICH CO/THE	47,759.66	66.7500	75,027.00	27,267.34
3,245.0000	MACY'S INC	132,086.34	58.0200	188,274.90	56,188.56
801.0000	STEVEN MADDEN LTD	20,138.70	34.3000	27,474.30	7,335.60
93.0000	MAGELLAN HEALTH INC	4,841.58	62.2400	5,788.32	946.74
672.0000	MANHATTAN ASSOCIATES INC	9,881.76	34.4300	23,136.96	13,255.20
1,781.0000	MANITOWOC CO INC/THE	22,487.21	32.8600	58,523.66	36,036.45
656.0000	MANPOWERGROUP INC	31,605.26	84.8500	55,661.60	24,056.34
5,659.0000	MARATHON OIL CORP	131,445.64	39.9200	225,907.28	94,461.64
1,767.0000	MARATHON PETROLEUM CORP	52,853.21	78.0700	137,949.69	85,096.48
513.0000	MARCUS CORP	4,945.32	18.2500	9,362.25	4,416.93
73.0000	MARKEL CORP	27,502.53	655.6400	47,861.72	20,359.19
84.0000	MARKETAXESS HOLDINGS INC	2,020.20	54.0600	4,541.04	2,520.84
603.0000	MARRIOTT VACATIONS WORLDWIDE CORP	23,263.74	58.6300	35,353.89	12,090.15



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4,022.0000	MARSH & MCLENNAN COS INC	114,930.83	51.8200	208,420.04	93,489.21
2,302.0000	MARRIOTT INTERNATIONAL INC/DE	83,593.80	64.1000	147,558.20	63,964.40
357.0000	MARTEN TRANSPORT LTD	4,971.82	22.3500	7,978.95	3,007.13
252.0000	MARTIN MARIETTA MATERIALS INC	24,838.08	132.0500	33,276.60	8,438.52
2,444.0000	MASCO CORP	32,964.59	22.2000	54,256.80	21,292.21
450.0000	MASTEC INC	8,212.50	30.8200	13,869.00	5,656.50
7,420.0000	MASTERCARD INC	199,224.92	73.4700	545,147.40	345,922.48
1,005.0000	MATTEL INC	17,618.79	38.9700	39,164.85	21,546.06
2,347.0000	MAXIM INTEGRATED PRODUCTS INC	55,858.52	33.8100	79,352.07	23,493.55
1,414.0000	MAXWELL TECHNOLOGIES INC	9,431.38	15.1300	21,393.82	11,962.44
866.0000	MAXIMUS INC	20,860.81	43.0200	37,255.32	16,394.51
2,008.0000	MCCLATCHY CO/THE	5,301.12	5.5500	11,144.40	5,843.28
492.0000	MCCORMICK & CO INC/MD	24,604.92	71.5900	35,222.28	10,617.36
5,689.0000	MCDONALD'S CORP	226,221.95	100.7400	573,109.86	346,887.91
507.0000	MCGRATH RENTCORP	14,893.26	36.7500	18,632.25	3,738.99
854.0000	MCGRAW HILL FINANCIAL INC	43,001.55	83.0300	70,907.62	27,906.07
1,667.0000	MCKESSON CORP	91,895.48	186.2100	310,412.07	218,516.59



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1,547.0000	MEAD JOHNSON NUTRITION CO	65,917.95	93.1700	144,133.99	78,216.04
1,338.0000	MEADWESTVACO CORP	31,578.47	44.2600	59,219.88	27,641.41
148.0000	MEASUREMENT SPECIALTIES INC	4,857.36	86.0700	12,738.36	7,881.00
526.0000	MEDALLION FINANCIAL CORP	5,207.40	12.4600	6,553.96	1,346.56
1,137.0000	MEDASSETS INC	15,118.53	22.8400	25,969.08	10,850.55
1,533.0000	MEDICAL PROPERTIES TRUST INC	16,478.18	13.2400	20,296.92	3,818.74
295.0000	MEDICINES CO/THE	4,838.00	29.0600	8,572.70	3,734.70
340.0000	MEDIFAST INC	8,673.40	30.4100	10,339.40	1,666.00
498.0000	MEDIDATA SOLUTIONS INC	9,800.64	42.8100	21,319.38	11,518.74
841.0000	MEDIVATION INC	42,150.92	77.0800	64,824.28	22,673.36
686.0000	MEDNAX INC	20,442.80	58.1500	39,890.90	19,448.10
582.0000	MEDLEY CAPITAL CORP	6,716.28	13.0600	7,600.92	884.64
4,280.0000	MEDTRONIC INC	200,411.48	63.7600	272,892.80	72,481.32
409.0000	MEN'S WEARHOUSE INC/THE	13,296.59	55.8000	22,822.20	9,525.61
765.0000	MENTOR GRAPHICS CORP	9,417.15	21.5700	16,501.05	7,083.90
21,910.0000	MERCK & CO INC	916,909.71	57.8500	1,267,493.50	350,583.79
402.0000	MERIDIAN INTERSTATE BANCORP IN	5,121.48	25.6800	10,323.36	5,201.88



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222.0000	MERITAGE HOMES CORP	5,072.70	42.2100	9,370.62	4,297.92
1,923.0000	MERITOR INC	9,634.23	13.0400	25,075.92	15,441.69
2,118.0000	MERRIMACK PHARMACEUTICALS INC	9,488.64	7.2900	15,440.22	5,951.58
1,675.0000	METLIFE INC	62,709.32	55.5600	93,063.00	30,353.68
327.0000	METTLER-TOLEDO INTERNATIONAL I	59,783.79	253.1800	82,789.86	23,006.07
502.0000	MICREL INC	5,050.12	11.2800	5,662.56	612.44
608.0000	MICROS SYSTEMS INC	20,228.16	67.9000	41,283.20	21,055.04
45,920.0000	MICROSOFT CORP	1,266,249.20	41.7000	1,914,864.00	648,614.80
1,351.0000	MICROCHIP TECHNOLOGY INC	48,453.62	48.8100	65,942.31	17,488.69
5,896.0000	MICRON TECHNOLOGY INC	36,810.48	32.9500	194,273.20	157,462.72
686.0000	MICROSEMI CORP	13,534.78	26.7600	18,357.36	4,822.58
530.0000	MID-AMERICA APARTMENT COMMUNIT	32,208.81	73.0500	38,716.50	6,507.69
444.0000	MIDDLEBY CORP	13,485.76	82.7200	36,727.68	23,241.92
255.0000	MIDDLESEX WATER CO	4,924.05	21.1800	5,400.90	476.85
1,713.0000	MIDSTATES PETROLEUM CO INC	9,798.36	7.2300	12,384.99	2,586.63
16,062.0000	MILLENNIAL MEDIA INC	75,330.78	4.9900	80,149.38	4,818.60
152.0000	MINERALS TECHNOLOGIES INC	4,883.76	65.5800	9,968.16	5,084.40



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250.0000	MOBILE MINI INC	5,067.50	47.8900	11,972.50	6,905.00
453.0000	MOHAWK INDUSTRIES INC	25,830.06	138.3400	62,668.02	36,837.96
191.0000	MOLINA HEALTHCARE INC	4,935.44	44.6300	8,524.33	3,588.89
612.0000	MOLSON COORS BREWING CO	27,433.18	74.1600	45,385.92	17,952.74
12,743.0000	MONDELEZ INTERNATIONAL INC	234,828.46	37.6100	479,264.23	244,435.77
345.0000	MONOLITHIC POWER SYSTEMS INC	5,226.75	42.3500	14,610.75	9,384.00
366.0000	MONOTYPE IMAGING HOLDINGS INC	5,025.18	28.1700	10,310.22	5,285.04
242.0000	MONRO MUFFLER BRAKE INC	8,252.20	53.1900	12,871.98	4,619.78
3,317.0000	MONSANTO CO	159,105.68	124.7400	413,762.58	254,656.90
472.0000	MONSTER BEVERAGE CORP	14,148.15	71.0300	33,526.16	19,378.01
5,048.0000	MONSTER WORLDWIDE INC	33,215.84	6.5400	33,013.92	201.92-
1,155.0000	MOODY'S CORP	57,736.98	87.6600	101,247.30	43,510.32
360.0000	MOOG INC	14,846.40	72.8900	26,240.40	11,394.00
8,202.0000	MORGAN STANLEY	172,064.93	32.3300	265,170.66	93,105.73
629.0000	MOTOROLA SOLUTIONS INC	33,754.12	66.5700	41,872.53	8,118.41
600.0000	MUELLER INDUSTRIES INC	10,908.00	29.4100	17,646.00	6,738.00
1,824.0000	MUELLER WATER PRODUCTS INC	10,086.72	8.6400	15,759.36	5,672.64



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1,599.0000	MURPHY OIL CORP	71,208.71	66.4800	106,301.52	35,092.81
399.0000	MURPHY USA INC	11,529.40	48.8900	19,507.11	7,977.71
3,657.0000	MYLAN INC/PA	77,842.16	51.5600	188,554.92	110,712.76
273.0000	NBT BANCORP INC	5,978.70	24.0200	6,557.46	578.76
449.0000	NCI BUILDING SYSTEMS INC	4,992.88	19.4300	8,724.07	3,731.19
1,929.0000	NCR CORP	40,041.90	35.0900	67,688.61	27,646.71
441.0000	NIC INC	5,538.96	15.8500	6,989.85	1,450.89
3,351.0000	NRG ENERGY INC	81,055.96	37.2000	124,657.20	43,601.24
43.0000	NVR INC	33,133.78	1,150.6000	49,475.80	16,342.02
849.0000	NASDAQ OMX GROUP INC/THE	28,080.68	38.6200	32,788.38	4,707.70
2,578.0000	NATIONAL OILWELL VARCO INC	107,020.99	82.3500	212,298.30	105,277.31
983.0000	NATIONAL PENN BANCSHARES INC	7,510.12	10.5800	10,400.14	2,890.02
675.0000	NATIONAL RETAIL PROPERTIES INC	16,395.75	37.1900	25,103.25	8,707.50
84.0000	NATIONAL WESTERN LIFE INSURANC	13,623.84	249.4100	20,950.44	7,326.60
199.0000	NAVIGATORS GROUP INC/THE	9,843.61	67.0500	13,342.95	3,499.34
507.0000	NAVIGANT CONSULTING INC	5,070.00	17.4500	8,847.15	3,777.15
3,438.0000	NAVIENT CORP W/D	35,481.33	17.7100	60,886.98	25,405.65



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1,887.0000	NEKTAR THERAPEUTICS	10,001.10	12.8200	24,191.34	14,190.24
233.0000	NELNET INC	5,039.79	41.4300	9,653.19	4,613.40
325.0000	NEOGEN CORP	9,949.33	40.4700	13,152.75	3,203.42
34.0000	NETFLIX INC	2,550.34	440.6000	14,980.40	12,430.06
485.0000	NETSCOUT SYSTEMS INC	11,937.74	44.3400	21,504.90	9,567.16
444.0000	NETSUITE INC	23,120.28	86.8800	38,574.72	15,454.44
692.0000	NEUROCRINE BIOSCIENCES INC	5,217.68	14.8350	10,265.82	5,048.14
115.0000	NEW JERSEY RESOURCES CORP	4,991.00	57.1600	6,573.40	1,582.40
2,352.0000	NEW YORK COMMUNITY BANCORP INC	30,470.03	15.9800	37,584.96	7,114.93
9,232.0000	NEW YORK MORTGAGE TRUST INC	71,069.20	7.8100	72,101.92	1,032.72
1,984.0000	NEWELL RUBBERMAID INC	43,310.72	30.9900	61,484.16	18,173.44
564.0000	NEWPARK RESOURCES INC	4,980.12	12.4600	7,027.44	2,047.32
3,768.0000	NEWS CORP	33,421.54	17.9400	67,597.92	34,176.38
3,549.0000	NEXTERA ENERGY INC	163,243.23	102.4800	363,701.52	200,458.29
2,744.0000	NIKE INC	60,192.80	77.5500	212,797.20	152,604.40
2,221.0000	NISOURCE INC	47,859.72	39.3400	87,374.14	39,514.42
2,804.0000	NOBLE ENERGY INC	100,598.57	77.4600	217,197.84	116,599.27



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3,058.0000	NORANDA ALUMINUM HOLDING CORP	9,938.50	3.5300	10,794.74	856.24
108.0000	NORDSON CORP	5,541.48	80.1900	8,660.52	3,119.04
1,487.0000	NORDSTROM INC	66,306.19	67.9300	101,011.91	34,705.72
2,807.0000	NORFOLK SOUTHERN CORP	121,386.47	103.0300	289,205.21	167,818.74
1,174.0000	NORTHEAST UTILITIES	41,752.20	47.2700	55,494.98	13,742.78
372.0000	NORTHERN TRUST CORP	19,883.40	64.2100	23,886.12	4,002.72
506.0000	NORTHFIELD BANCORP INC/NJ	5,089.21	13.1100	6,633.66	1,544.45
2,183.0000	NORTHROP GRUMMAN CORP	135,168.90	119.6300	261,152.29	125,983.39
1,527.0000	NORTHSTAR REALTY FINANCE CORP	13,452.87	17.3800	26,539.26	13,086.39
843.0000	NORTHWEST BANCSHARES INC	10,242.45	13.5700	11,439.51	1,197.06
211.0000	NORTHWEST PIPE CO	5,042.90	40.3300	8,509.63	3,466.73
644.0000	NOW INC/DE	11,913.40	36.2100	23,319.24	11,405.84
435.0000	NU SKIN ENTERPRISES INC	15,712.20	73.9600	32,172.60	16,460.40
1,201.0000	NUANCE COMMUNICATIONS INC	19,996.65	18.7700	22,542.77	2,546.12
196.0000	NUCOR CORP	7,755.72	49.2500	9,653.00	1,897.28
1,348.0000	OGE ENERGY CORP	36,160.99	39.0800	52,679.84	16,518.85
690.0000	NUVERRA ENVIRONMENTAL SOLUTION	9,970.50	20.1100	13,875.90	3,905.40



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420.0000	OFG BANCORP	4,863.60	18.4100	7,732.20	2,868.60
473.0000	OASIS PETROLEUM INC	12,747.35	55.8900	26,435.97	13,688.62
5,551.0000	OCCIDENTAL PETROLEUM CORP	264,993.64	102.6300	569,699.13	304,705.49
1,144.0000	OCEANEERING INTERNATIONAL INC	47,399.34	78.1300	89,380.72	41,981.38
652.0000	OCEANFIRST FINANCIAL CORP	8,482.52	16.5600	10,797.12	2,314.60
3,779.0000	OFFICE DEPOT INC	9,919.13	5.6900	21,502.51	11,583.38
585.0000	OIL STATES INTERNATIONAL INC	17,144.57	64.0900	37,492.65	20,348.08
565.0000	OLD DOMINION FREIGHT LINE INC	13,612.73	63.6800	35,979.20	22,366.47
752.0000	OLD NATIONAL BANCORP/IN	7,753.12	14.2800	10,738.56	2,985.44
2,060.0000	OLD REPUBLIC INTERNATIONAL COR	25,865.97	16.5400	34,072.40	8,206.43
633.0000	OLIN CORP	13,774.08	26.9200	17,040.36	3,266.28
1,041.0000	OMNICARE INC	24,984.00	66.5700	69,299.37	44,315.37
2,433.0000	OMNICOM GROUP INC	113,864.15	71.2200	173,278.26	59,414.11
807.0000	OMEGA HEALTHCARE INVESTORS INC	16,462.80	36.8600	29,746.02	13,283.22
974.0000	OMEGA PROTEIN CORP	6,447.88	13.6800	13,324.32	6,876.44
678.0000	OMNIVISION TECHNOLOGIES INC	9,498.78	21.9800	14,902.44	5,403.66
504.0000	ON ASSIGNMENT INC	9,843.12	35.5700	17,927.28	8,084.16



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2,500.0000	ON SEMICONDUCTOR CORP	20,175.00	9.1400	22,850.00	2,675.00
488.0000	ONE GAS INC	7,459.70	37.7500	18,422.00	10,962.30
316.0000	ONE LIBERTY PROPERTIES INC	4,964.36	21.3400	6,743.44	1,779.08
1,952.0000	ONEOK INC	52,869.92	68.0800	132,892.16	80,022.24
223.0000	OPENTABLE INC	9,881.13	103.6000	23,102.80	13,221.67
1,470.0000	OPKO HEALTH INC	5,086.20	8.8400	12,994.80	7,908.60
26,151.0000	ORACLE CORP	467,198.07	40.5300	1,059,900.03	592,701.96
12,600.0000	OREXIGEN THERAPEUTICS INC	75,348.00	6.1800	77,868.00	2,520.00
446.0000	ORITANI FINANCIAL CORP	5,646.36	15.3900	6,863.94	1,217.58
220.0000	ORMAT TECHNOLOGIES INC	4,802.60	28.8300	6,342.60	1,540.00
1,107.0000	OSHKOSH CORP	23,667.66	55.5300	61,471.71	37,804.05
339.0000	OUTERWALL INC	17,177.45	59.3500	20,119.65	2,942.20
1,446.0000	OWENS CORNING	40,919.94	38.6800	55,931.28	15,011.34
1,725.0000	OWENS-ILLINOIS INC	47,127.00	34.6400	59,754.00	12,627.00
155.0000	OXFORD INDUSTRIES INC	5,068.50	66.6700	10,333.85	5,265.35
186.0000	PDC ENERGY INC	5,520.48	63.1500	11,745.90	6,225.42
1,110.0000	PDL BIOPHARMA INC	6,393.60	9.6800	10,744.80	4,351.20



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3,398.0000	PHH CORP	77,495.33	22.9800	78,086.04	590.71
1,472.0000	PMC - SIERRA INC	9,877.12	7.6100	11,201.92	1,324.80
2,462.0000	PNC FINANCIAL SERVICES GROUP I	165,028.37	89.0500	219,241.10	54,212.73
836.0000	PNM RESOURCES INC	15,080.96	29.3300	24,519.88	9,438.92
724.0000	PPG INDUSTRIES INC	54,728.08	210.1500	152,148.60	97,420.52
2,069.0000	PPL CORP	56,656.66	35.5300	73,511.57	16,854.91
193.0000	PS BUSINESS PARKS INC	9,588.24	83.4900	16,113.57	6,525.33
676.0000	PVH CORP	52,279.52	116.6000	78,821.60	26,542.08
946.0000	PTC INC	21,587.72	38.8000	36,704.80	15,117.08
2,904.0000	PACCAR INC	110,156.47	62.8300	182,458.32	72,301.85
3,921.0000	PACIFIC BIOSCIENCES OF CALIFOR	10,508.28	6.1800	24,231.78	13,723.50
752.0000	PACIRA PHARMACEUTICALS INC	12,791.52	91.8600	69,078.72	56,287.20
863.0000	PACKAGING CORP OF AMERICA	22,248.14	71.4900	61,695.87	39,447.73
981.0000	PACWEST BANCORP	21,041.46	43.1700	42,349.77	21,308.31
384.0000	PALL CORP	11,895.01	85.3900	32,789.76	20,894.75
182.0000	PALO ALTO NETWORKS INC	9,700.60	83.8500	15,260.70	5,560.10
406.0000	PANDORA MEDIA INC	4,876.06	29.5000	11,977.00	7,100.94



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63.0000	PANERA BREAD CO	7,045.92	149.8300	9,439.29	2,393.37
801.0000	PAREXEL INTERNATIONAL CORP	20,278.45	52.8400	42,324.84	22,046.39
340.0000	PARK NATIONAL CORP	21,654.60	77.2000	26,248.00	4,593.40
253.0000	PARK-OHIO HOLDINGS CORP	5,039.76	58.1100	14,701.83	9,662.07
3,185.0000	PARK STERLING CORP	14,844.16	6.5900	20,989.15	6,144.99
841.0000	PARKER DRILLING CO	4,734.83	6.5200	5,483.32	748.49
1,033.0000	PARKER HANNIFIN CORP	53,857.73	125.7300	129,879.09	76,021.36
963.0000	PARKWAY PROPERTIES INC/MD	10,458.18	20.6500	19,885.95	9,427.77
820.0000	PATTERSON COS INC	25,953.00	39.5100	32,398.20	6,445.20
859.0000	PATTERSON-UTI ENERGY INC	18,374.01	34.9400	30,013.46	11,639.45
2,471.0000	PAYCHEX INC	71,982.04	41.5600	102,694.76	30,712.72
432.0000	PEBBLEBROOK HOTEL TRUST	9,789.12	36.9600	15,966.72	6,177.60
539.0000	PENN NATIONAL GAMING INC	4,585.97	12.1400	6,543.46	1,957.49
2,127.0000	PENN VIRGINIA CORP	10,018.17	16.9500	36,052.65	26,034.48
10,066.0000	JC PENNEY CO INC	89,841.40	9.0500	91,097.30	1,255.90
677.0000	PENNSYLVANIA REAL ESTATE INVES	11,923.01	18.8200	12,741.14	818.13
3,638.0000	PENNYMAC MORTGAGE INVESTMENT T	79,744.96	21.9400	79,817.72	72.76



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354.0000	PENSKE AUTOMOTIVE GROUP INC	7,625.16	49.5000	17,523.00	9,897.84
433.0000	PEOPLES FEDERAL BANCSHARES INC	7,703.07	18.4600	7,993.18	290.11
1,675.0000	PEOPLE'S UNITED FINANCIAL INC	21,369.72	15.1700	25,409.75	4,040.03
456.0000	PEP BOYS-MANNY MOE & JACK	4,920.24	11.4600	5,225.76	305.52
1,740.0000	PEPCO HOLDINGS INC	31,911.60	27.4800	47,815.20	15,903.60
7,838.0000	PEPSICO INC	511,323.01	89.3400	700,246.92	188,923.91
437.0000	PERKINELMER INC	8,329.00	46.8400	20,469.08	12,140.08
780.0000	PETSMART INC	32,748.48	59.8000	46,644.00	13,895.52
419.0000	PHARMACYCLICS INC	24,482.17	89.7100	37,588.49	13,106.32
31,238.0000	PFIZER INC	860,949.45	29.6800	927,143.84	66,194.39
395.0000	PHARMERICA CORP	5,186.35	28.5900	11,293.05	6,106.70
11,267.0000	PHILIP MORRIS INTERNATIONAL IN	464,815.85	84.3100	949,920.77	485,104.92
4,083.0000	PHILLIPS 66	117,179.25	80.4300	328,395.69	211,216.44
277.0000	PHOENIX COS INC NEW COM NEW	9,750.40	48.3900	13,404.03	3,653.63
170.0000	PIEDMONT NATURAL GAS CO INC	4,996.30	37.4100	6,359.70	1,363.40
595.0000	PIER 1 IMPORTS INC	6,783.00	15.4100	9,168.95	2,385.95
492.0000	PINNACLE ENTERTAINMENT INC	6,883.08	25.1800	12,388.56	5,505.48



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322.0000	PINNACLE FINANCIAL PARTNERS IN	4,842.88	39.4800	12,712.56	7,869.68
486.0000	PINNACLE WEST CAPITAL CORP	20,187.32	57.8400	28,110.24	7,922.92
621.0000	PIONEER NATURAL RESOURCES CO	74,392.56	229.8100	142,712.01	68,319.45
172.0000	PIPER JAFFRAY COS	4,819.44	51.7700	8,904.44	4,085.00
914.0000	PITNEY BOWES INC	10,072.28	27.6200	25,244.68	15,172.40
382.0000	PLANTRONICS INC	13,331.80	48.0500	18,355.10	5,023.30
298.0000	PLEXUS CORP	9,506.20	43.2900	12,900.42	3,394.22
1,214.0000	PLUM CREEK TIMBER CO INC	42,641.73	45.1000	54,751.40	12,109.67
698.0000	POLARIS INDUSTRIES INC	42,630.58	130.2400	90,907.52	48,276.94
1,242.0000	POLYONE CORP	20,837.56	42.1400	52,337.88	31,500.32
382.0000	POOL CORP	10,948.12	56.5600	21,605.92	10,657.80
396.0000	POPEYES LOUISIANA KITCHEN INC	9,987.12	43.7100	17,309.16	7,322.04
645.0000	POPULAR INC	10,042.65	34.1800	22,046.10	12,003.45
405.0000	PORTFOLIO RECOVERY ASSOCIATES	11,476.35	59.5300	24,109.65	12,633.30
197.0000	PORTLAND GENERAL ELECTRIC CO	4,934.85	34.6700	6,829.99	1,895.14
63.0000	POST HOLDINGS INC	1,658.50	50.9100	3,207.33	1,548.83
396.0000	POST PROPERTIES INC	15,578.64	53.4600	21,170.16	5,591.52



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141.0000	POTLATCH CORP	4,920.90	41.4000	5,837.40	916.50
229.0000	POWER INTEGRATIONS INC	8,408.88	57.5400	13,176.66	4,767.78
1,741.0000	PRAXAIR INC	103,626.40	132.8400	231,274.44	127,648.04
1,140.0000	PRECISION CASTPARTS CORP	136,304.10	252.4000	287,736.00	151,431.90
643.0000	PREMIERE GLOBAL SERVICES INC	4,912.52	13.3500	8,584.05	3,671.53
411.0000	PRESTIGE BRANDS HOLDINGS INC	4,960.77	33.8900	13,928.79	8,968.02
2,504.0000	T ROWE PRICE GROUP INC	119,326.12	84.4100	211,362.64	92,036.52
357.0000	THE PRICELINE GROUP INC/THE	129,750.57	1,203.0000	429,471.00	299,720.43
107.0000	PRICESMART INC	5,056.82	87.0400	9,313.28	4,256.46
1,649.0000	PRINCIPAL FINANCIAL GROUP INC	51,811.69	50.4800	83,241.52	31,429.83
484.0000	PROASSURANCE CORP	16,845.62	44.4000	21,489.60	4,643.98
20.0000	PROCERA NETWORKS INC (DE)	224.60	10.0900	201.80	22.80-
14,652.0000	PROCTER & GAMBLE CO/THE	916,217.40	78.5900	1,151,500.68	235,283.28
485.0000	PRIVATEBANCORP INC	10,024.95	29.0600	14,094.10	4,069.15
1,459.0000	PROGRESSIVE CORP/THE	28,727.71	25.3600	37,000.24	8,272.53
3,281.0000	PROLOGIS INC	106,361.93	41.0900	134,816.29	28,454.36
613.0000	PROS HOLDINGS INC	9,814.13	26.4400	16,207.72	6,393.59



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774.0000	PROSPECT CAPITAL CORP	7,825.14	10.6250	8,223.75	398.61
372.0000	PROSPERITY BANCSHARES INC	15,791.40	62.6000	23,287.20	7,495.80
1,189.0000	PROTECTIVE LIFE CORP	26,635.36	69.3300	82,433.37	55,798.01
480.0000	PROVIDENT FINANCIAL SERVICES I	6,628.80	17.3200	8,313.60	1,684.80
3,107.0000	PRUDENTIAL FINANCIAL INC	231,615.22	88.7700	275,808.39	44,193.17
4,299.0000	PUBLIC SERVICE ENTERPRISE GROU	132,728.49	40.7900	175,356.21	42,627.72
972.0000	PUBLIC STORAGE	83,880.30	171.3500	166,552.20	82,671.90
761.0000	PULTEGROUP INC	14,642.84	20.1600	15,341.76	698.92
172.0000	QUAD/GRAPHICS INC	2,652.24	22.3700	3,847.64	1,195.40
932.0000	PZENA INVESTMENT MANAGEMENT IN	5,070.08	11.1600	10,401.12	5,331.04
122.0000	QUAKER CHEMICAL CORP	4,941.00	76.7900	9,368.38	4,427.38
1,404.0000	QEP RESOURCES INC	40,356.47	34.5000	48,438.00	8,081.53
12,504.0000	QUALCOMM INC	471,883.68	79.2000	990,316.80	518,433.12
1,822.0000	QUANTA SERVICES INC	42,147.42	34.5800	63,004.76	20,857.34
151.0000	QUESTCOR PHARMACEUTICALS INC	4,877.30	92.4900	13,965.99	9,088.69
2,316.0000	QUESTAR CORP	33,318.15	24.8000	57,436.80	24,118.65
5,524.0000	QUICKSILVER RESOURCES INC	9,335.56	2.6700	14,749.08	5,413.52



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2,217.0000	RAIT FINANCIAL TRUST	10,020.84	8.2700	18,334.59	8,313.75
735.0000	RLJ LODGING TRUST	14,928.20	28.8900	21,234.15	6,305.95
322.0000	RPC INC	4,840.73	23.4900	7,563.78	2,723.05
1,036.0000	RPM INTERNATIONAL INC DELAWARE	23,133.88	46.1800	47,842.48	24,708.60
971.0000	RAMBUS INC	7,360.18	14.3000	13,885.30	6,525.12
465.0000	RALPH LAUREN CORP	38,908.88	160.6900	74,720.85	35,811.97
1,081.0000	RAMCO-GERSHENSON PROPERTIES TR	14,977.65	16.6200	17,966.22	2,988.57
1,373.0000	RANGE RESOURCES CORP	65,936.76	86.9500	119,382.35	53,445.59
186.0000	RAVEN INDUSTRIES INC	4,954.11	33.1400	6,164.04	1,209.93
747.0000	RAYMOND JAMES FINANCIAL INC	20,251.17	50.7300	37,895.31	17,644.14
966.0000	RAYONIER INC	29,884.54	35.5500	34,341.30	4,456.76
322.0000	RAYONIER ADVANCED MATERIALS	10,700.34	38.7500	12,477.50	1,777.16
2,830.0000	RAYTHEON CO	135,996.21	92.2500	261,067.50	125,071.29
130.0000	RBC BEARINGS INC	4,838.60	64.0500	8,326.50	3,487.90
1,361.0000	REALTY INCOME CORP	46,868.43	44.4200	60,455.62	13,587.19
516.0000	RED HAT INC	24,211.19	55.2700	28,519.32	4,308.13
1,227.0000	REDWOOD TRUST INC	19,304.31	19.4700	23,889.69	4,585.38



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307.0000	REGAL-BELOIT CORP	19,519.06	78.5600	24,117.92	4,598.86
643.0000	REGAL ENTERTAINMENT GROUP	7,580.97	21.1000	13,567.30	5,986.33
708.0000	REGENCY CENTERS CORP	29,098.80	55.6800	39,421.44	10,322.64
451.0000	REGENERON PHARMACEUTICALS INC	23,857.90	282.4700	127,393.97	103,536.07
8,713.0000	REGIONS FINANCIAL CORP	55,953.74	10.6200	92,532.06	36,578.32
547.0000	REINSURANCE GROUP OF AMERICA I	29,417.66	78.9000	43,158.30	13,740.64
594.0000	RELIANCE STEEL & ALUMINUM CO	29,736.92	73.7100	43,783.74	14,046.82
79.0000	RENASANT CORP	1,142.34	29.0700	2,296.53	1,154.19
1,121.0000	REPUBLIC AIRWAYS HOLDINGS INC	5,235.07	10.8400	12,151.64	6,916.57
2,684.0000	REPUBLIC SERVICES INC	66,941.19	37.9700	101,911.48	34,970.29
1,215.0000	RESMED INC	37,659.58	50.6300	61,515.45	23,855.87
366.0000	RESOLUTE FST PRODS INC	4,871.46	16.7800	6,141.48	1,270.02
418.0000	RESOURCES CONNECTION INC	5,082.88	13.1100	5,479.98	397.10
393.0000	RETAIL OPPORTUNITY INVESTMENTS	5,144.37	15.7300	6,181.89	1,037.52
471.0000	REXNORD HOLDINGS INC	9,989.91	28.1500	13,258.65	3,268.74
1,555.0000	REYNOLDS AMERICAN INC	48,341.45	60.3500	93,844.25	45,502.80
3,861.0000	RIGEL PHARMACEUTICALS INC	9,999.99	3.6300	14,015.43	4,015.44



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2,219.0000	RINGCENTRAL INC	33,418.14	15.1300	33,573.47	155.33
719.0000	RIVERBED TECHNOLOGY INC	10,655.40	20.6300	14,832.97	4,177.57
1,166.0000	ROBERT HALF INTERNATIONAL INC	34,465.11	47.7400	55,664.84	21,199.73
550.0000	ROCK TENN CO	35,332.00	105.5900	58,074.50	22,742.50
1,156.0000	ROCKWELL AUTOMATION INC	66,287.58	125.1600	144,684.96	78,397.38
1,101.0000	ROCKWELL COLLINS INC	60,493.79	78.1400	86,032.14	25,538.35
415.0000	ROCKWOOD HOLDINGS INC	21,505.30	75.9900	31,535.85	10,030.55
110.0000	ROGERS CORP	4,951.10	66.3500	7,298.50	2,347.40
253.0000	ROLLINS INC	4,986.63	30.0000	7,590.00	2,603.37
120.0000	ROSS STORES INC	2,700.45	66.1300	7,935.60	5,235.15
297.0000	ROYAL GOLD INC	12,195.17	76.1300	22,610.61	10,415.44
275.0000	RUSH ENTERPRISES INC	5,049.00	34.6700	9,534.25	4,485.25
408.0000	RYDER SYSTEM INC	21,356.64	88.0900	35,940.72	14,584.08
257.0000	RYLAND GROUP INC	10,002.44	39.4400	10,136.08	133.64
602.0000	RYMAN HOSPITALITY PROPERTIES	19,685.50	48.1500	28,986.30	9,300.80
281.0000	S&T BANCORP INC	4,979.32	24.8500	6,982.85	2,003.53
1,134.0000	SBA COMMUNICATIONS CORP	50,357.61	102.3000	116,008.20	65,650.59



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1,158.0000	SEI INVESTMENTS CO	25,487.70	32.7700	37,947.66	12,459.96
990.0000	SL GREEN REALTY CORP	59,269.76	109.4100	108,315.90	49,046.14
3,438.0000	SLM CORP	19,830.04	8.3100	28,569.78	8,739.74
575.0000	SM ENERGY CO	21,085.25	84.1000	48,357.50	27,272.25
279.0000	SPS COMMERCE INC	10,041.21	63.1900	17,630.01	7,588.80
405.0000	SPX CORP	32,096.25	108.2100	43,825.05	11,728.80
264.0000	SS&C TECHNOLOGIES HOLDINGS INC	5,026.56	44.2200	11,674.08	6,647.52
244.0000	SP PLUS CORP	4,953.20	21.3900	5,219.16	265.96
340.0000	SVB FINANCIAL GROUP	19,485.40	116.6200	39,650.80	20,165.40
865.0000	SWS GROUP INC	4,887.25	7.2800	6,297.20	1,409.95
615.0000	SABRA HEALTH CARE REIT INC	10,239.75	28.7100	17,656.65	7,416.90
264.0000	SAFEGUARD SCIENTIFICS INC	4,823.28	20.7900	5,488.56	665.28
1,186.0000	SAFEGUARD SCIENTIFICS INC	29,039.94	34.3400	40,727.24	11,687.30
168.0000	SAIA INC	1,733.76	43.9300	7,380.24	5,646.48
2,761.0000	ST JUDE MEDICAL INC	97,161.25	69.2500	191,199.25	94,038.00
3,224.0000	SALESFORCE.COM INC	89,117.79	58.0800	187,249.92	98,132.13
464.0000	SALIX PHARMACEUTICALS LTD	17,678.40	123.3500	57,234.40	39,556.00



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1,621.0000	SALLY BEAUTY HOLDINGS INC	33,459.75	25.0800	40,654.68	7,194.93
175.0000	SANDERSON FARMS INC	8,447.25	97.2000	17,010.00	8,562.75
1,667.0000	SANDISK CORP	41,630.99	104.4300	174,084.81	132,453.82
276.0000	SANDY SPRING BANCORP INC	4,832.76	24.9100	6,875.16	2,042.40
639.0000	SANMINA CORP	5,923.53	22.7800	14,556.42	8,632.89
130.0000	SAUL CENTERS INC	4,982.90	48.6000	6,318.00	1,335.10
1,148.0000	SCANA CORP	39,069.76	53.8100	61,773.88	22,704.12
140.0000	SCANSOURCE INC	5,075.00	38.0800	5,331.20	256.20
733.0000	HENRY SCHEIN INC	48,647.09	118.6550	86,974.12	38,327.03
9,920.0000	SCHLUMBERGER LTD	597,304.55	117.9500	1,170,064.00	572,759.45
202.0000	A SCHULMAN INC	4,951.02	38.7000	7,817.40	2,866.38
9,267.0000	CHARLES SCHWAB CORP/THE	163,945.12	26.9300	249,560.31	85,615.19
190.0000	SCHWEITZER-MAUDUIT INTL INC	5,102.45	43.6600	8,295.40	3,192.95
165.0000	SCIENCE APPLICATIONS INTERNATI	4,839.30	44.1600	7,286.40	2,447.10
361.0000	SCOTTS MIRACLE-GRO CO/THE	18,602.33	56.8600	20,526.46	1,924.13
746.0000	SCRIPPS NETWORKS INTERACTIVE I	33,792.98	81.1400	60,530.44	26,737.46
621.0000	SEACOAST BANKING CORP OF FLORI	4,685.76	10.8700	6,750.27	2,064.51



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172.0000	SEACOR HOLDINGS INC	10,983.77	82.2500	14,147.00	3,163.23
1,240.0000	SEALED AIR CORP	28,467.14	34.1700	42,370.80	13,903.66
29.0000	SEARS CANADA INC	315.17	13.6100	394.69	79.52
1,177.0000	SEATTLE GENETICS INC	25,325.08	38.2500	45,020.25	19,695.17
530.0000	SELECT MEDICAL HOLDINGS CORP	4,754.10	15.6000	8,268.00	3,513.90
429.0000	SELECTIVE INSURANCE GROUP INC	6,803.94	24.7200	10,604.88	3,800.94
453.0000	SEMGROUP CORP	14,803.07	78.8500	35,719.05	20,915.98
2,320.0000	SEMPRA ENERGY	117,190.16	104.7100	242,927.20	125,737.04
948.0000	SENIOR HOUSING PROPERTIES TRUS	19,974.36	24.2900	23,026.92	3,052.56
397.0000	SENSIENT TECHNOLOGIES CORP	14,434.92	55.7200	22,120.84	7,685.92
1,485.0000	SERVICE CORP INTERNATIONAL/US	13,780.80	20.7200	30,769.20	16,988.40
315.0000	SERVICENOW INC	9,437.40	61.9600	19,517.40	10,080.00
735.0000	SHERWIN-WILLIAMS CO/THE	79,542.15	206.9100	152,078.85	72,536.70
2,217.0000	SHORETEL INC	9,865.65	6.5200	14,454.84	4,589.19
340.0000	SHUTTERFLY INC	10,091.20	43.0600	14,640.40	4,549.20
328.0000	SIGNATURE BANK/NEW YORK NY	18,308.96	126.1800	41,387.04	23,078.08
353.0000	SILICON LABORATORIES INC	13,791.71	49.2500	17,385.25	3,593.54



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142.0000	SILGAN HOLDINGS INC	5,689.94	50.8200	7,216.44	1,526.50
633.0000	SIMMONS FIRST NATIONAL CORP	15,451.53	39.3900	24,933.87	9,482.34
2,215.0000	SIMON PROPERTY GROUP INC	187,989.34	166.2800	368,310.20	180,320.86
351.0000	SIMPLICITY BANCORP	5,101.71	17.4500	6,124.95	1,023.24
487.0000	SINCLAIR BROADCAST GROUP INC	5,084.28	34.7500	16,923.25	11,838.97
443.0000	SIRONA DENTAL SYSTEMS INC	23,080.30	82.4600	36,529.78	13,449.48
27,198.0000	SIRIUS XM HOLDINGS INC	54,124.02	3.4600	94,105.08	39,981.06
20.0000	SIX FLAGS ENTERTAINMENT CORP	368.74	42.5500	851.00	482.26
351.0000	SKECHERS U.S.A. INC	4,794.66	45.7000	16,040.70	11,246.04
1,511.0000	SKYWORKS SOLUTIONS INC	25,821.14	46.9600	70,956.56	45,135.42
1,226.0000	AO SMITH CORP	31,556.68	49.5800	60,785.08	29,228.40
462.0000	SNAP-ON INC	27,752.34	118.5200	54,756.24	27,003.90
229.0000	SNYDERS-LANCE INC	4,813.58	26.4600	6,059.34	1,245.76
1,579.0000	SOLAZYME INC	13,074.12	11.7800	18,600.62	5,526.50
452.0000	SOLARWINDS INC	11,214.12	38.6600	17,474.32	6,260.20
102.0000	SOLERA HOLDINGS INC	5,815.02	67.1500	6,849.30	1,034.28
375.0000	SONIC AUTOMOTIVE INC	5,231.25	26.6800	10,005.00	4,773.75



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588.0000	SONOCO PRODUCTS CO	19,862.64	43.9300	25,830.84	5,968.20
6,727.0000	SOUTHERN CO	237,661.96	45.3800	305,271.26	67,609.30
979.0000	SOUTHSIDE BANCSHARES INC	16,289.20	28.9600	28,351.84	12,062.64
4,696.0000	SOUTHWEST AIRLINES CO	54,951.81	26.8600	126,134.56	71,182.75
133.0000	SOUTHWEST GAS CORP	4,984.84	52.7900	7,021.07	2,036.23
1,830.0000	SOUTHWESTERN ENERGY CO	61,990.35	45.4900	83,246.70	21,256.35
44.0000	SOVRAN SELF STORAGE INC	1,738.88	77.2500	3,399.00	1,660.12
903.0000	SPARTANNASH CO	14,948.21	21.0100	18,972.03	4,023.82
4,276.0000	SPECTRA ENERGY CORP	107,894.64	42.4800	181,644.48	73,749.84
153.0000	SPECTRUM BRANDS HOLDINGS INC	4,984.74	86.0300	13,162.59	8,177.85
363.0000	SPEEDWAY MOTORSPORTS INC	5,027.55	18.2500	6,624.75	1,597.20
982.0000	SPIRIT AEROSYSTEMS HOLDINGS IN	19,698.92	33.7000	33,093.40	13,394.48
108.0000	SPIRIT AIRLINES INC	1,298.20	63.2400	6,829.92	5,531.72
342.0000	SPLUNK INC	9,866.70	55.3300	18,922.86	9,056.16
5,482.0000	SPRINT CORP	32,892.00	8.5300	46,761.46	13,869.46
318.0000	STAGE STORES INC	5,116.62	18.6900	5,943.42	826.80
283.0000	STANCORP FINANCIAL GROUP INC	10,219.13	64.0000	18,112.00	7,892.87



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1,234.0000	STANDARD PACIFIC CORP	10,106.46	8.6000	10,612.40	505.94
1,589.0000	STANLEY BLACK & DECKER INC	99,639.89	87.8200	139,545.98	39,906.09
5,623.0000	STARBUCKS CORP	192,476.98	77.3800	435,107.74	242,630.76
308.0000	STATE AUTO FINANCIAL CORP	4,989.60	23.4300	7,216.44	2,226.84
740.0000	STARWOOD PROPERTY TRUST INC	14,829.60	23.7700	17,589.80	2,760.20
1,788.0000	STARWOOD HOTELS & RESORTS WORL	103,556.14	80.8200	144,506.16	40,950.02
776.0000	STATE STREET CORP	48,437.92	67.2600	52,193.76	3,755.84
589.0000	STEEL DYNAMICS INC	9,229.63	17.9500	10,572.55	1,342.92
632.0000	STEELCASE INC	7,059.44	15.1300	9,562.16	2,502.72
451.0000	STERICYCLE INC	25,986.00	118.4200	53,407.42	27,421.42
147.0000	STERIS CORP	4,999.47	53.4800	7,861.56	2,862.09
2,056.0000	STERLING BANCORP/DE	15,031.20	12.0000	24,672.00	9,640.80
368.0000	STIFEL FINANCIAL CORP	13,141.28	47.3500	17,424.80	4,283.52
1,770.0000	STILLWATER MINING CO	19,671.38	17.5500	31,063.50	11,392.12
510.0000	STOCK YDS BANCORP INC	11,480.10	29.9000	15,249.00	3,768.90
389.0000	STONE ENERGY CORP	11,090.39	46.7900	18,201.31	7,110.92
246.0000	STRAIGHT PATH COMMUNICATIONS I	665.71	10.2000	2,509.20	1,843.49



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2,541.0000	STRATEGIC HOTELS & RESORTS INC	19,228.44	11.7100	29,755.11	10,526.67
102.0000	STRAYER EDUCATION INC	4,783.80	52.5100	5,356.02	572.22
2,674.0000	STRYKER CORP	132,885.24	84.3200	225,471.68	92,586.44
225.0000	STURM RUGER & CO INC	9,650.25	59.0100	13,277.25	3,627.00
168.0000	SUN COMMUNITIES INC	6,177.36	49.8400	8,373.12	2,195.76
168.0000	SUN HYDRAULICS CORP	4,962.72	40.6000	6,820.80	1,858.08
518.0000	SUNCOKE ENERGY INC	9,667.35	21.5000	11,137.00	1,469.65
2,883.0000	SUNEDISON INC	28,798.70	22.6000	65,155.80	36,357.10
2,427.0000	SUNESIS PHARMACEUTICALS INC	9,926.43	6.5200	15,824.04	5,897.61
802.0000	SUNPOWER CORP	5,333.30	40.9800	32,865.96	27,532.66
2,286.0000	SUNSTONE HOTEL INVESTORS INC	18,380.40	14.9300	34,129.98	15,749.58
3,491.0000	SUNTRUST BANKS INC	83,377.22	40.0600	139,849.46	56,472.24
3,787.0000	SUPERVALU INC	10,111.29	8.2200	31,129.14	21,017.85
1,103.0000	SUSQUEHANNA BANCSHARES INC	10,488.83	10.5600	11,647.68	1,158.85
629.0000	SWIFT TRANSPORTATION CO	8,060.64	25.2300	15,869.67	7,809.03
272.0000	SYNAPTICS INC	6,808.16	90.6400	24,654.08	17,845.92
400.0000	SYNAGEVA BIOPHARMA CORP	18,384.00	104.8000	41,920.00	23,536.00



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1,479.0000	SYNOPSYS INC	39,454.24	38.8200	57,414.78	17,960.54
1,269.0000	SYNOVUS FINANCIAL CORP	19,797.96	24.3800	30,938.22	11,140.26
185.0000	SYNTEL INC	9,836.45	85.9600	15,902.60	6,066.15
199.0000	SYNNEX CORP	6,095.37	72.8500	14,497.15	8,401.78
471.0000	SYSCO CORP	14,714.04	37.4500	17,638.95	2,924.91
1,270.0000	TCF FINANCIAL CORP	12,954.00	16.3700	20,789.90	7,835.90
2,119.0000	TD AMERITRADE HOLDING CORP	40,137.21	31.3500	66,430.65	26,293.44
1,654.0000	TECO ENERGY INC	26,060.92	18.4800	30,565.92	4,505.00
829.0000	THL CREDIT INC	10,660.94	14.0000	11,606.00	945.06
1,409.0000	TJX COS INC	20,081.28	53.1500	74,888.35	54,807.07
985.0000	T-MOBILE US INC	20,071.14	33.6200	33,115.70	13,044.56
831.0000	TRW AUTOMOTIVE HOLDINGS CORP	29,215.92	89.5200	74,391.12	45,175.20
2,973.0000	TRI POINTE HOMES LLC	45,605.82	15.7200	46,735.56	1,129.74
1,201.0000	TW TELECOM INC	19,828.51	40.3100	48,412.31	28,583.80
584.0000	TAKE-TWO INTERACTIVE SOFTWARE	8,649.04	22.2400	12,988.16	4,339.12
158.0000	TAL INTERNATIONAL GROUP INC	4,833.22	44.3600	7,008.88	2,175.66
646.0000	TANGER FACTORY OUTLET CENTERS	17,241.74	34.9700	22,590.62	5,348.88



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1,993.0000	TARGET CORP	111,605.41	57.9500	115,494.35	3,888.94
198.0000	TARGA RESOURCES CORP	10,036.62	139.5700	27,634.86	17,598.24
391.0000	TEAM HEALTH HOLDINGS INC	11,015.70	49.9400	19,526.54	8,510.84
477.0000	TECH DATA CORP	20,119.86	62.5200	29,822.04	9,702.18
156.0000	TECHNE CORP	10,007.40	92.5700	14,440.92	4,433.52
335.0000	TEJON RANCH CO	9,550.85	32.1900	10,783.65	1,232.80
102.0000	TELEDYNE TECHNOLOGIES INC	4,876.62	97.1700	9,911.34	5,034.72
359.0000	TELEFLEX INC	19,863.47	105.6000	37,910.40	18,046.93
433.0000	TELEPHONE & DATA SYS INC	10,235.20	26.1100	11,305.63	1,070.43
497.0000	TEMPUR SEALY INTERNATIONAL INC	19,671.26	59.7000	29,670.90	9,999.64
1,090.0000	TENET HEALTHCARE CORP	25,189.03	46.9400	51,164.60	25,975.57
205.0000	TENNANT CO	9,667.80	76.3200	15,645.60	5,977.80
524.0000	TENNECO INC	20,231.14	65.7000	34,426.80	14,195.66
1,473.0000	TERADYNE INC	19,592.08	19.6000	28,870.80	9,278.72
808.0000	TEREX CORP	14,197.98	41.1000	33,208.80	19,010.82
567.0000	TERRENO REALTY CORP	9,769.41	19.3300	10,960.11	1,190.70
51.0000	TESLA MOTORS INC	1,406.33	240.0600	12,243.06	10,836.73



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511.0000	TESORO CORP	24,465.99	58.6700	29,980.37	5,514.38
224.0000	TETRA TECH INC	5,071.36	27.5000	6,160.00	1,088.64
406.0000	TESSERA TECHNOLOGIES INC	6,565.02	22.0800	8,964.48	2,399.46
181.0000	TEXAS INDUSTRIES INC	7,227.33	92.3600	16,717.16	9,489.83
8,525.0000	TEXAS INSTRUMENTS INC	286,238.85	47.7900	407,409.75	121,170.90
2,165.0000	TEXTRON INC	57,152.97	38.2900	82,897.85	25,744.88
548.0000	THERAVANCE INC	11,645.00	29.7800	16,319.44	4,674.44
2,709.0000	THERMO FISHER SCIENTIFIC INC	113,658.08	118.0000	319,662.00	206,003.92
1,502.0000	THOMSON REUTERS CORP	43,348.86	36.3600	54,612.72	11,263.86
703.0000	THORATEC CORP	19,824.60	34.8600	24,506.58	4,681.98
725.0000	3D SYSTEMS CORP	26,967.30	59.8000	43,355.00	16,387.70
5,086.0000	3M CO	380,754.56	143.2400	728,518.64	347,764.08
412.0000	TIDEWATER INC	20,797.76	56.1500	23,133.80	2,336.04
771.0000	TIFFANY & CO	49,922.86	100.2500	77,292.75	27,369.89
864.0000	TIME INC	10,402.07	24.2200	20,926.08	10,524.01
6,914.0000	TIME WARNER INC	252,178.71	70.2500	485,708.50	233,529.79
2,201.0000	TIME WARNER CABLE INC	121,840.83	147.3000	324,207.30	202,366.47



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666.0000	TIMKEN CO	20,286.36	67.8400	45,181.44	24,895.08
490.0000	TIVO INC	4,870.60	12.9100	6,325.90	1,455.30
1,391.0000	TOLL BROTHERS INC	30,679.35	36.9000	51,327.90	20,648.55
354.0000	TOMPKINS FINANCIAL CORP	13,784.76	48.1800	17,055.72	3,270.96
630.0000	TORCHMARK CORP	26,371.81	81.9200	51,609.60	25,237.79
492.0000	TORO CO/THE	14,696.04	63.6000	31,291.20	16,595.16
455.0000	TOWERS WATSON & CO	28,687.75	104.2300	47,424.65	18,736.90
1,308.0000	TOTAL SYSTEM SERVICES INC	19,999.32	31.4100	41,084.28	21,084.96
1,087.0000	TOWNEBANK/PORTSMOUTH VA	14,036.02	15.7100	17,076.77	3,040.75
1,374.0000	TRACTOR SUPPLY CO	47,105.25	60.4000	82,989.60	35,884.35
176.0000	TRANSDIGM GROUP INC	15,102.56	167.2600	29,437.76	14,335.20
2,785.0000	TRAVELERS COS INC/THE	129,474.93	94.0700	261,984.95	132,510.02
282.0000	TREEHOUSE FOODS INC	15,281.58	80.0700	22,579.74	7,298.16
380.0000	TREX CO INC	4,913.40	28.8200	10,951.60	6,038.20
273.0000	TRIANGLE CAPITAL CORP	5,121.48	28.3700	7,745.01	2,623.53
1,821.0000	TRIANGLE PETE CORP COM NEW	9,505.62	11.7500	21,396.75	11,891.13
422.0000	TRICO BANCSHARES	6,055.70	23.1400	9,765.08	3,709.38



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1,447.0000	TRIMBLE NAVIGATION LTD	36,224.65	36.9500	53,466.65	17,242.00
16.0000	TRINITY INDUSTRIES INC	161.76	43.7200	699.52	537.76
1,739.0000	TRIQUINT SEMICONDUCTOR INC	9,738.40	15.8100	27,493.59	17,755.19
298.0000	TRIUMPH GROUP INC	14,327.84	69.8200	20,806.36	6,478.52
881.0000	TRIPADVISOR INC	32,322.32	108.6600	95,729.46	63,407.14
345.0000	TRUEBLUE INC	5,023.20	27.5700	9,511.65	4,488.45
1,755.0000	TRULIA INC	83,344.95	47.3800	83,151.90	193.05-
970.0000	TRUSTCO BANK CORP NY	4,840.30	6.6800	6,479.60	1,639.30
508.0000	TRUSTMARK CORP	11,536.68	24.6900	12,542.52	1,005.84
1,617.0000	TUESDAY MORNING CORP	7,033.95	17.8200	28,814.94	21,780.99
547.0000	TUPPERWARE BRANDS CORP	26,086.43	83.7000	45,783.90	19,697.47
262.0000	TUTOR PERINI CORP	4,904.64	31.7400	8,315.88	3,411.24
15,089.0000	TWENTY FIRST CENTURY FOX INC	259,022.92	35.1500	530,378.35	271,355.43
968.0000	TWO HARBORS INVESTMENT CORP	9,941.36	10.4800	10,144.64	203.28
605.0000	TYLER TECHNOLOGIES INC	24,641.80	91.2100	55,182.05	30,540.25
3,171.0000	TYSON FOODS INC	51,121.59	37.5400	119,039.34	67,917.75
1,508.0000	UDR INC	35,160.08	28.6300	43,174.04	8,013.96



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887.0000	UGI CORP	27,727.62	50.5000	44,793.50	17,065.88
158.0000	UIL HOLDINGS CORP	5,027.92	38.7100	6,116.18	1,088.26
254.0000	UMB FINANCIAL CORP	10,170.16	63.3900	16,101.06	5,930.90
14,272.0000	US BANCORP	473,909.67	43.3200	618,263.04	144,353.37
291.0000	UNS ENERGY CORP	10,630.23	60.4100	17,579.31	6,949.08
464.0000	URS CORP	19,209.60	45.8500	21,274.40	2,064.80
680.0000	USG CORP	15,660.61	30.1300	20,488.40	4,827.79
437.0000	USA MOBILITY INC	4,959.95	15.4000	6,729.80	1,769.85
504.0000	US SILICA HOLDINGS INC	10,241.28	55.4400	27,941.76	17,700.48
587.0000	UBIQUITI NETWORKS INC	10,114.01	45.1900	26,526.53	16,412.52
360.0000	ULTA SALON COSMETICS & FRAGRAN	22,618.80	91.4100	32,907.60	10,288.80
369.0000	ULTIMATE SOFTWARE GROUP INC	26,098.55	138.1700	50,984.73	24,886.18
591.0000	ULTRA CLEAN HOLDINGS	5,029.41	9.0500	5,348.55	319.14
1,029.0000	ULTRA PETROLEUM CORP	19,747.49	29.6900	30,551.01	10,803.52
1,390.0000	UMPQUA HOLDINGS CORP	14,640.26	17.9200	24,908.80	10,268.54
1,938.0000	UNDER ARMOUR INC	40,130.88	59.4900	115,291.62	75,160.74
97.0000	UNIFIRST CORP/MA	4,938.27	106.0000	10,282.00	5,343.73



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817.0000	UNION BANKSHARES CORP	9,722.80	25.6500	20,956.05	11,233.25
3,264.0000	UNION PACIFIC CORP	73,078.93	99.7500	325,584.00	252,505.07
346.0000	UNITED BANKSHARES INC	8,124.08	32.3300	11,186.18	3,062.10
2,231.0000	UNITED CONTINENTAL HOLDINGS IN	47,835.23	41.0700	91,627.17	43,791.94
556.0000	UNITED FINL BANCORP INC	6,128.58	13.5500	7,533.80	1,405.22
384.0000	UNITED NATURAL FOODS INC	15,970.56	65.1000	24,998.40	9,027.84
118.0000	UNITED ONLINE INC	1,015.05	10.4000	1,227.20	212.15
3,842.0000	UNITED PARCEL SERVICE INC	272,284.31	102.6600	394,419.72	122,135.41
721.0000	UNITED RENTALS INC	21,329.68	104.7300	75,510.33	54,180.65
137.0000	UNITED STATES CELLULAR CORP	4,985.43	40.8000	5,589.60	604.17
1,094.0000	UNITED STATES STEEL CORP	26,342.32	26.0400	28,487.76	2,145.44
365.0000	UNITED STATIONERS INC	12,442.85	41.4700	15,136.55	2,693.70
6,186.0000	UNITED TECHNOLOGIES CORP	393,956.03	115.4500	714,173.70	320,217.67
453.0000	UNITED THERAPEUTICS CORP	24,890.81	88.4900	40,085.97	15,195.16
7,238.0000	UNITEDHEALTH GROUP INC	358,181.11	81.7500	591,706.50	233,525.39
434.0000	UNITIL CORP	12,143.23	33.8300	14,682.22	2,538.99
184.0000	UNIVERSAL FOREST PRODUCTS INC	4,852.08	48.2700	8,881.68	4,029.60



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583.0000	UNIVERSAL HEALTH SERVICES INC	26,135.84	95.7600	55,828.08	29,692.24
567.0000	UNIVEST CORP OF PENNSYLVANIA	8,686.44	20.7000	11,736.90	3,050.46
2,929.0000	UNUM GROUP	57,405.98	34.7600	101,812.04	44,406.06
896.0000	URBAN OUTFITTERS INC	27,625.92	33.8600	30,338.56	2,712.64
653.0000	VCA INC	14,947.32	35.0900	22,913.77	7,966.45
1,564.0000	VF CORP	40,030.21	63.0000	98,532.00	58,501.79
221.0000	VSE CORP	4,906.20	70.3200	15,540.72	10,634.52
286.0000	VAIL RESORTS INC	12,644.06	77.1800	22,073.48	9,429.42
2,925.0000	VALERO ENERGY CORP	125,108.14	50.1000	146,542.50	21,434.36
283.0000	VALMONT INDUSTRIES INC	25,907.97	151.9500	43,001.85	17,093.88
905.0000	VALSPAR CORP/THE	36,257.02	76.1900	68,951.95	32,694.93
494.0000	VANTIV INC	10,008.44	33.6200	16,608.28	6,599.84
931.0000	VARIAN MEDICAL SYSTEMS INC	45,158.16	83.1400	77,403.34	32,245.18
182.0000	VECTREN CORP	4,972.24	42.5000	7,735.00	2,762.76
35.0000	VEECO INSTRUMENTS INC	1,192.80	37.2600	1,304.10	111.30
462.0000	VENTAS INC	20,286.28	64.1000	29,614.20	9,327.92
397.0000	VERIFONE SYSTEMS INC	9,988.52	36.7500	14,589.75	4,601.23



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1,338.0000	VERISIGN INC	31,500.80	48.8100	65,307.78	33,806.98
23,822.0000	VERIZON COMMUNICATIONS INC	838,797.87	48.9300	1,165,610.46	326,812.59
1,349.0000	VERISK ANALYTICS INC	64,468.48	60.0200	80,966.98	16,498.50
1,546.0000	VERTEX PHARMACEUTICALS INC	60,186.00	94.6800	146,375.28	86,189.28
288.0000	VIASAT INC	12,041.28	57.9600	16,692.48	4,651.20
4,311.0000	VIACOM INC	161,002.92	86.7300	373,893.03	212,890.11
472.0000	VIEWPOINT FINANCIAL GROUP INC	9,907.28	26.9100	12,701.52	2,794.24
3,464.0000	VISA INC	304,962.09	210.7100	729,899.44	424,937.35
1,153.0000	VISHAY INTERTECHNOLOGY INC	10,884.32	15.4900	17,859.97	6,975.65
275.0000	VISTEON CORP/NEW	18,138.37	97.0100	26,677.75	8,539.38
9,351.0000	VIVUS INC	48,905.73	5.3200	49,747.32	841.59
424.0000	VLASIC FOODS INTL INC COM	4,492.60	10.5957	4,492.60	0.00
527.0000	VMWARE INC	48,421.00	96.8100	51,018.87	2,597.87
14,238.0000	VONAGE HOLDINGS CORP	44,085.50	3.7500	53,392.50	9,307.00
1,157.0000	VORNADO REALTY TRUST	94,275.74	106.7300	123,486.61	29,210.87
3,278.0000	VRINGO INC	9,834.00	3.4200	11,210.76	1,376.76
885.0000	VULCAN MATERIALS CO	46,745.70	63.7500	56,418.75	9,673.05



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121.0000	WD-40 CO	4,749.25	75.2200	9,101.62	4,352.37
213.0000	WABCO HOLDINGS INC	14,611.56	106.8200	22,752.66	8,141.10
128.0000	WSFS FINANCIAL CORP	4,825.60	73.6700	9,429.76	4,604.16
1,602.0000	WABASH NATIONAL CORP	14,823.13	14.2500	22,828.50	8,005.37
1,065.0000	WABTEC CORP/DE	44,163.31	82.5900	87,958.35	43,795.04
1,135.0000	WADDELL & REED FINANCIAL INC	40,562.63	62.5900	71,039.65	30,477.02
11,530.0000	WAL-MART STORES INC	573,150.53	75.0700	865,557.10	292,406.57
6,214.0000	WALGREEN CO	278,417.03	74.1300	460,643.82	182,226.79
6,249.0000	WARREN RESOURCES INC	14,622.66	6.2000	38,743.80	24,121.14
1,272.0000	WASHINGTON FEDERAL INC	19,728.72	22.4300	28,530.96	8,802.24
1,107.0000	WASHINGTON PRIME GROUP INC	11,723.05	18.7400	20,745.18	9,022.13
526.0000	WASHINGTON TRUST BANCORP INC	11,698.24	36.7700	19,341.02	7,642.78
902.0000	WASTE CONNECTIONS INC	28,196.52	48.5500	43,792.10	15,595.58
1,493.0000	WASTE MANAGEMENT INC	50,794.30	44.7300	66,781.89	15,987.59
99.0000	WATERS CORP	8,992.17	104.4400	10,339.56	1,347.39
223.0000	WATSCO INC	14,637.72	102.7600	22,915.48	8,277.76
239.0000	WATTS WATER TECHNOLOGIES INC	7,918.07	61.7300	14,753.47	6,835.40



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784.0000	WAUSAU PAPER CORP	5,080.32	10.8200	8,482.88	3,402.56
675.0000	WEB.COM GROUP INC	10,071.00	28.8700	19,487.25	9,416.25
722.0000	WEBMD HEALTH CORP	11,169.34	48.3000	34,872.60	23,703.26
572.0000	WEBSTER FINANCIAL CORP	11,422.84	31.5400	18,040.88	6,618.04
1,041.0000	WEINGARTEN REALTY INVESTORS	24,244.89	32.8400	34,186.44	9,941.55
256.0000	WEIS MARKETS INC	9,799.68	45.7300	11,706.88	1,907.20
338.0000	WELLCARE HEALTH PLANS INC	16,592.42	74.6600	25,235.08	8,642.66
1,797.0000	WELLPOINT INC	137,165.19	107.6100	193,375.17	56,209.98
35,656.0000	WELLS FARGO & CO	1,268,323.27	52.5600	1,874,079.36	605,756.09
4,237.0000	WENDYS CO	19,744.42	8.5300	36,141.61	16,397.19
261.0000	WESBANCO INC	4,909.41	31.0400	8,101.44	3,192.03
205.0000	WESCO INTERNATIONAL INC	14,719.77	86.3800	17,707.90	2,988.13
232.0000	WEST PHARMACEUTICAL SERVICES I	4,938.12	42.1800	9,785.76	4,847.64
648.0000	WESTAR ENERGY INC	19,968.29	38.1900	24,747.12	4,778.83
229.0000	WESTAMERICA BANCORPORATION	11,021.77	52.2800	11,972.12	950.35
50.0000	WESTERN ASSET MORTGAGE CAPITAL	739.01	14.1700	708.50	30.51-
1,846.0000	WESTERN DIGITAL CORP	48,923.62	92.3000	170,385.80	121,462.18



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865.0000	WESTERN REFINING INC	19,131.73	37.5500	32,480.75	13,349.02
592.0000	WESTLAKE CHEMICAL CORP	19,081.10	83.7600	49,585.92	30,504.82
203.0000	WESTWOOD HOLDINGS GROUP INC	7,346.57	60.0400	12,188.12	4,841.55
381.0000	WEX INC	20,544.63	104.9700	39,993.57	19,448.94
3,073.0000	WEYERHAEUSER CO	69,872.66	33.0900	101,685.57	31,812.91
548.0000	WHIRLPOOL CORP	46,521.53	139.2200	76,292.56	29,771.03
390.0000	WHITESTONE REIT	4,952.06	14.9100	5,814.90	862.84
781.0000	WHITEWAVE FOODS CO	10,637.52	32.3700	25,280.97	14,643.45
932.0000	WHITING PETROLEUM CORP	43,906.76	80.2500	74,793.00	30,886.24
2,456.0000	WHOLE FOODS MARKET INC	77,650.46	38.6300	94,875.28	17,224.82
1,562.0000	WILLBROS GROUP INC	9,965.56	12.3500	19,290.70	9,325.14
5,276.0000	WILLIAMS COS INC/THE	110,401.22	58.2100	307,115.96	196,714.74
834.0000	WILLIAMS-SONOMA INC	30,118.26	71.7800	59,864.52	29,746.26
1,136.0000	WINDSTREAM HOLDINGS INC	9,088.00	9.9600	11,314.56	2,226.56
416.0000	WINTHROP REALTY TRUST	4,987.84	15.3500	6,385.60	1,397.76
277.0000	WINTRUST FINANCIAL CORP	8,670.10	46.0000	12,742.00	4,071.90
823.0000	WISCONSIN ENERGY CORP	29,154.38	46.9200	38,615.16	9,460.78



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788.0000	WOLVERINE WORLD WIDE INC	15,960.94	26.0600	20,535.28	4,574.34
488.0000	WOODWARD INC	15,796.56	50.1800	24,487.84	8,691.28
410.0000	WORKDAY INC	22,361.40	89.8600	36,842.60	14,481.20
125.0000	WORLD ACCEPTANCE CORP	7,825.00	75.9600	9,495.00	1,670.00
562.0000	WORLD FUEL SERVICES CORP	19,293.46	49.2300	27,667.26	8,373.80
456.0000	WORTHINGTON INDUSTRIES INC	8,974.08	43.0400	19,626.24	10,652.16
1,558.0000	WPX ENERGY INC	20,425.74	23.9100	37,251.78	16,826.04
341.0000	WRIGHT MEDICAL GROUP INC	4,934.27	31.4000	10,707.40	5,773.13
862.0000	WYNDHAM WORLDWIDE CORP	30,945.19	75.7200	65,270.64	34,325.45
304.0000	WYNN RESORTS LTD	37,169.44	207.5600	63,098.24	25,928.80
2,756.0000	XPO LOGISTICS INC	78,546.00	28.6200	78,876.72	330.72
2,720.0000	XILINX INC	64,001.60	47.3100	128,683.20	64,681.60
6,803.0000	XEROX CORP	50,081.61	12.4400	84,629.32	34,547.71
1,269.0000	XYLEM INC/NY	33,996.51	39.0800	49,592.52	15,596.01
6,617.0000	YAHOO! INC	126,271.97	35.1300	232,455.21	106,183.24
321.0000	YELP INC	11,196.48	76.6800	24,614.28	13,417.80
545.0000	YORK WATER CO	10,224.20	20.8200	11,346.90	1,122.70



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1,847.0000	YUM! BRANDS INC	48,613.22	81.2000	149,976.40	101,363.18
580.0000	ZEBRA TECHNOLOGIES CORP	16,854.80	82.3200	47,745.60	30,890.80
559.0000	ZILLOW INC	62,986.89	142.9300	79,897.87	16,910.98
1,676.0000	ZIMMER HOLDINGS INC	113,328.94	103.8600	174,069.36	60,740.42
1,126.0000	ZIONS BANCORPORATION	24,519.06	29.4700	33,183.22	8,664.16
1,826.0000	ZULILY INC	70,656.89	40.9500	74,774.70	4,117.81
5,988.0000	ZOGENIX INC	10,160.44	2.0100	12,035.88	1,875.44
15,998.0000	ZYNGA INC	47,054.75	3.2100	51,353.58	4,298.83
1,470.0000	GYRODYNE CO OF AMERICA INC 2	0.00	0.0000	0.00	0.00
135.0000	GYRODYNE SPECIAL DIST LLC	0.00	0.0000	0.00	0.00
TOTAL INVESTMENTS EQUITY		78,861,169.07		139,215,719.04	60,354,549.97
TOTAL INVESTMENT		79,209,079.73		139,563,629.70	60,354,549.97



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<u>INVESTMENTS CASH EQUIVALENTS</u>					
1,325,021.2500	FIDELITY INSTL MM PRIME 690	1,325,021.25	100.0000	1,325,021.25	0.00
TOTAL INVESTMENTS CASH EQUIVALENTS		1,325,021.25		1,325,021.25	0.00
<u>INVESTMENTS FIXED INCOME SECURITIES</u>					
100,000.0000	ACCO BRANDS CORP 6.750% 04/30/2020 DD 04/30/13	100,000.00	104.7500	104,750.00	4,750.00
300,000.0000	ADS WASTE HOLDINGS INC 8.250% 10/01/2020 DD 10/01/13	312,397.68	107.7500	323,250.00	10,852.32
175,000.0000	AES CORP/VA 4.875% 05/15/2023 DD 04/30/13	178,178.29	99.0000	173,250.00	4,928.29-
125,000.0000	AFFINIA GROUP INC 7.750% 05/01/2021 DD 11/01/13	127,892.48	105.2500	131,562.50	3,670.02
111,000.0000	AMHG MERGER SUB INC 9.250% 11/01/2018 DD 10/22/10	111,000.00	106.5000	118,215.00	7,215.00
200,000.0000	ALLIANCE DATA SYSTEMS COR 144A 6.375% 04/01/2020 DD 03/29/12	201,067.81	106.5000	213,000.00	11,932.19
150,000.0000	ALLIANCE DATA SYSTEMS COR 144A 5.250% 12/01/2017 DD 11/20/12	155,648.06	104.5000	156,750.00	1,101.94
175,000.0000	ALLISON TRANSMISSION INC 144A 7.125% 05/15/2019 DD 05/06/11	182,171.22	107.0000	187,250.00	5,078.78



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175,000.0000	ALPHABET HOLDING CO INC 7.750% 11/01/2017 DD 05/01/13	180,023.57	103.2500	180,687.50	663.93
200,000.0000	AMERICAN AXLE & MANUFACTURING 6.250% 03/15/2021 DD 02/28/13	211,278.54	107.5000	215,000.00	3,721.46
200,000.0000	AMERICAN BUILDERS & CONTR 144A 5.625% 04/15/2021 DD 04/16/13	200,518.23	103.5000	207,000.00	6,481.77
300,000.0000	AMERISTAR CASINOS INC 7.500% 04/15/2021 DD 10/15/11	306,108.87	107.7500	323,250.00	17,141.13
150,000.0000	AMERIGAS FINANCE LLC / AMERIGA 7.000% 05/20/2022 DD 01/12/12	150,000.00	110.7500	166,125.00	16,125.00
200,000.0000	ANCESTRY.COM INC 144A 9.625% 10/15/2018 DD 09/17/13	205,559.53	103.3750	206,750.00	1,190.47
350,000.0000	ARCELORMITTAL VAR RT 03/01/2021 DD 03/07/11	364,753.97	108.2500	378,875.00	14,121.03
200,000.0000	ATKORE 4/14 COV-LITE TL	199,027.92	99.9170	199,834.00	806.08
175,000.0000	ATWOOD OCEANICS INC 6.500% 02/01/2020 DD 01/18/12	181,440.78	106.6250	186,593.75	5,152.97
175,000.0000	BERRY PETROLEUM CO 6.750% 11/01/2020 DD 11/01/10	186,102.59	105.2500	184,187.50	1,915.09-
175,000.0000	BI-LO LLC / BI-LO FINANCE 144A 8.625% 09/15/2018 DD 09/20/13	174,486.89	101.5000	177,625.00	3,138.11
200,000.0000	BIOMET INC 6.500% 10/01/2020 DD 04/01/13	199,857.83	106.7500	213,500.00	13,642.17



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175,000.0000	BOMBARDIER INC 144A 6.125% 01/15/2023 DD 01/14/13	175,000.00	103.0000	180,250.00	5,250.00
250,000.0000	BRAND ENERGY & INFRASTRUC 144A 8.500% 12/01/2021 DD 11/26/13	250,000.00	106.7500	266,875.00	16,875.00
100,000.0000	CCO HOLDINGS LLC / CCO HOLDING 6.500% 04/30/2021 DD 05/10/11	105,698.60	106.5000	106,500.00	801.40
125,000.0000	CCO HOLDINGS LLC / CCO HOLDING 6.625% 01/31/2022 DD 01/26/12	125,260.52	107.5000	134,375.00	9,114.48
50,000.0000	CCO HOLDINGS LLC / CCO HOLDING 5.125% 02/15/2023 DD 12/17/12	50,000.00	100.8750	50,437.50	437.50
350,000.0000	CBS OUTDOOR AMERICAS CAPI 144A 5.625% 02/15/2024 DD 01/31/14	350,000.00	103.2500	361,375.00	11,375.00
200,000.0000	CDW LLC / CDW FINANCE CORP 8.500% 04/01/2019 DD 10/01/11	203,687.59	108.2500	216,500.00	12,812.41
200,000.0000	CGG SA 144A 6.875% 01/15/2022 DD 05/01/14	200,000.00	99.7500	199,500.00	500.00-
175,000.0000	CHS/COMMUNITY HEALTH SYSTEMS I 8.000% 11/15/2019 DD 05/15/12	184,766.42	109.5000	191,625.00	6,858.58
100,000.0000	CHS/COMMUNITY HEALTH SYSTEMS I 5.125% 08/15/2018 DD 08/17/12	103,714.06	104.8750	104,875.00	1,160.94
250,000.0000	CSC HOLDINGS LLC 144A 5.250% 06/01/2024 DD 05/23/14	250,000.00	98.3750	245,937.50	4,062.50-



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200,000.0000	CABLEVISION SYSTEMS CORP 7.750% 04/15/2018 DD 04/15/10	200,318.52	113.0000	226,000.00	25,681.48
67,000.0000	CALPINE CORP 144A 7.875% 07/31/2020 DD 07/23/10	69,513.22	108.5000	72,695.00	3,181.78
150,000.0000	CASCADES INC 7.875% 01/15/2020 DD 12/23/09	151,329.11	106.2500	159,375.00	8,045.89
175,000.0000	CATALENT PHARMA SOLUTIONS INC 7.875% 10/15/2018 DD 04/15/13	175,212.60	101.7500	178,062.50	2,849.90
200,000.0000	CENTRAL GARDEN AND PET CO 8.250% 03/01/2018 DD 03/08/10	202,711.97	103.7500	207,500.00	4,788.03
325,000.0000	CENTURYLINK INC 5.800% 03/15/2022 DD 03/12/12	331,753.08	104.1250	338,406.25	6,653.17
225,000.0000	CEQUEL COMMUNICATIONS HOL 144A 6.375% 09/15/2020 DD 10/25/12	230,642.08	106.2500	239,062.50	8,420.42
200,000.0000	CHEMTURA CORP 5.750% 07/15/2021 DD 07/23/13	201,752.77	103.7500	207,500.00	5,747.23
125,000.0000	CINCINNATI BELL INC 8.750% 03/15/2018 DD 03/15/10	126,015.05	104.8750	131,093.75	5,078.70
150,000.0000	FRONTIER COMMUNICATIONS CORP 7.125% 03/15/2019 DD 03/23/07	162,452.49	113.5000	170,250.00	7,797.51
150,000.0000	CLEAN HARBORS INC 5.250% 08/01/2020 DD 07/30/12	150,039.58	103.1250	154,687.50	4,647.92



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100,000.0000	CLEAN HARBORS INC 5.125% 06/01/2021 DD 12/07/12	100,162.29	102.1880	102,188.00	2,025.71
175,000.0000	CLEAR CHANNEL WORLDWIDE HOLDIN 7.625% 03/15/2020 DD 03/15/12	182,608.49	107.8750	188,781.25	6,172.76
100,000.0000	COMMSCOPE HOLDING CO INC 144A 6.625% 06/01/2020 DD 05/28/13	100,000.00	106.7500	106,750.00	6,750.00
101,000.0000	CIE GENERALE DE GEOPHYSIQUE - 7.750% 05/15/2017 DD 02/09/07	100,941.94	101.5000	102,515.00	1,573.06
250,000.0000	COVANTA HOLDING CORP 5.875% 03/01/2024 DD 03/06/14	256,216.03	103.3750	258,437.50	2,221.47
225,000.0000	CYRUSONE LP / CYRUSONE FINANCE 6.375% 11/15/2022 DD 05/15/13	226,433.14	107.7500	242,437.50	16,004.36
200,000.0000	DAVITA HEALTHCARE PARTNERS INC 6.625% 11/01/2020 DD 10/20/10	203,251.63	106.2500	212,500.00	9,248.37
150,000.0000	DAVITA HEALTHCARE PARTNERS INC 5.750% 08/15/2022 DD 08/28/12	153,093.61	106.8750	160,312.50	7,218.89
175,000.0000	DENBURY RESOURCES INC 4.625% 07/15/2023 DD 02/05/13	175,000.00	97.0210	169,786.75	5,213.25-
150,000.0000	DIAMONDBACK ENERGY INC 144A 7.625% 10/01/2021 DD 09/18/13	150,000.00	110.0000	165,000.00	15,000.00
250,000.0000	DISH DBS CORP 7.875% 09/01/2019 DD 08/17/09	252,341.49	118.7500	296,875.00	44,533.51



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100,000.0000	DISH DBS CORP 5.000% 03/15/2023 DD 12/27/12	101,861.53	101.8750	101,875.00	13.47
100,000.0000	DISH DBS CORP 5.125% 05/01/2020 DD 04/05/13	100,000.00	105.1250	105,125.00	5,125.00
200,000.0000	DOLE FOOD CO INC 144A 7.250% 05/01/2019 DD 11/01/13	200,917.00	101.2500	202,500.00	1,583.00
200,000.0000	RR DONNELLEY & SONS CO 7.000% 02/15/2022 DD 08/26/13	200,000.00	110.2500	220,500.00	20,500.00
100,000.0000	RR DONNELLEY & SONS CO 6.000% 04/01/2024 DD 03/20/14	100,000.00	101.0000	101,000.00	1,000.00
250,000.0000	DUFYR FINANCE SCA 144A 5.500% 10/15/2020 DD 10/26/12	250,000.00	103.8310	259,577.50	9,577.50
100,000.0000	DUPONT FABROS TECHNOLOGY LP 5.875% 09/15/2021 DD 09/24/13	100,074.42	104.5000	104,500.00	4,425.58
150,000.0000	ENDO FINANCE LLC 144A 5.750% 01/15/2022 DD 12/19/13	150,000.00	102.0000	153,000.00	3,000.00
175,000.0000	ENDO FINANCE LLC & ENDO F 144A 7.000% 07/15/2019 DD 05/06/14	189,911.03	106.8750	187,031.25	2,879.78-
250,000.0000	ENERGY TRANSFER EQUITY 144A 5.875% 01/15/2024 DD 12/02/13	254,962.59	104.5000	261,250.00	6,287.41
200,000.0000	ENTEGRIS INC 144A 6.000% 04/01/2022 DD 04/01/14	200,000.00	103.0000	206,000.00	6,000.00



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148,749.0000	EXGEN 2/14 HOLDCO TL 0.000% 02/05/2021 DD 01/22/14	148,045.73	101.3750	150,794.30	2,748.57
200,000.0000	EXTERRAN HOLDINGS INC 7.250% 12/01/2018 DD 12/01/11	200,000.00	105.5000	211,000.00	11,000.00
275,000.0000	FMG RESOURCES AUGUST 2006 144A 8.250% 11/01/2019 DD 10/28/11	292,779.90	108.8750	299,406.25	6,626.35
200,000.0000	FTI CONSULTING INC 6.000% 11/15/2022 DD 05/15/13	200,000.00	102.8750	205,750.00	5,750.00
225,000.0000	FELCOR LODGING LP 5.625% 03/01/2023 DD 03/01/13	225,000.00	103.0000	231,750.00	6,750.00
175,000.0000	FIRST QUALITY FINANCE CO 144A 4.625% 05/15/2021 DD 05/14/13	175,000.00	94.5000	165,375.00	9,625.00-
150,000.0000	FRESENIUS MEDICAL CARE US 144A 5.875% 01/31/2022 DD 01/26/12	150,000.00	110.5000	165,750.00	15,750.00
200,000.0000	FRONTIER COMMUNICATIONS CORP 8.500% 04/15/2020 DD 04/12/10	205,369.15	118.0000	236,000.00	30,630.85
225,000.0000	GEO GROUP INC/THE 6.625% 02/15/2021 DD 08/15/11	225,000.00	107.2500	241,312.50	16,312.50
300,000.0000	GARDA WORLD SECURITY CORP 144A 7.250% 11/15/2021 DD 11/08/13	310,928.54	105.1250	315,375.00	4,446.46
200,000.0000	GATES GLOBAL LLC 144A 6.000% 07/15/2022 DD 06/26/14	200,000.00	100.0000	200,000.00	0.00



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225,000.0000	GIBSON ENERGY INC 144A 6.750% 07/15/2021 DD 06/28/13	221,910.89	108.2500	243,562.50	21,651.61
100,000.0000	GOODYEAR TIRE & RUBBER CO/THE 8.250% 08/15/2020 DD 08/13/10	108,887.20	109.7500	109,750.00	862.80
200,000.0000	GOODYEAR TIRE & RUBBER CO/THE 6.500% 03/01/2021 DD 02/25/13	201,040.15	108.5000	217,000.00	15,959.85
200,000.0000	GRAY TELEVISION INC 7.500% 10/01/2020 DD 10/09/12	210,050.13	107.7500	215,500.00	5,449.87
200,000.0000	GRIFFEY INTERMEDIATE INC 144A 7.000% 10/15/2020 DD 10/18/12	200,544.35	91.6250	183,250.00	17,294.35-
300,000.0000	GROUP 1 AUTOMOTIVE INC 5.000% 06/01/2022 DD 06/02/14	300,000.00	100.0000	300,000.00	0.00
175,000.0000	GULFMARK OFFSHORE INC 6.375% 03/15/2022 DD 09/15/12	175,984.37	104.0000	182,000.00	6,015.63
100,000.0000	HCA INC 6.375% 01/15/2015 DD 11/19/04	99,797.91	102.3750	102,375.00	2,577.09
100,000.0000	HCA HOLDINGS INC 7.750% 05/15/2021 DD 11/15/11	102,284.85	109.6250	109,625.00	7,340.15
125,000.0000	HCA INC 7.500% 02/15/2022 DD 08/01/11	125,000.00	115.3750	144,218.75	19,218.75
200,000.0000	HD SUPPLY INC 7.500% 07/15/2020 DD 10/15/13	214,011.69	109.2500	218,500.00	4,488.31



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250,000.0000	HILLMAN GROUP INC 144A 6.375% 07/15/2022 DD 06/30/14	250,000.00	100.0000	250,000.00	0.00
150,000.0000	HANESBRANDS INC 6.375% 12/15/2020 DD 11/09/10	150,000.00	108.1250	162,187.50	12,187.50
165,000.0000	HJ HEINZ CO 4.250% 10/15/2020 DD 04/15/14	165,000.00	100.6250	166,031.25	1,031.25
250,000.0000	HERTZ CORP/THE 7.500% 10/15/2018 DD 04/15/11	250,000.00	104.7500	261,875.00	11,875.00
100,000.0000	HERTZ CORP/THE 5.875% 10/15/2020 DD 10/16/12	100,000.00	104.5000	104,500.00	4,500.00
150,000.0000	HOLOGIC INC 6.250% 08/01/2020 DD 02/01/13	150,000.00	105.5000	158,250.00	8,250.00
125,000.0000	HUGHES SATELLITE SYSTEMS CORP 7.625% 06/15/2021 DD 12/15/11	127,206.17	114.5000	143,125.00	15,918.83
175,000.0000	HUGHES SATELLITE SYSTEMS CORP 6.500% 06/15/2019 DD 12/15/11	176,466.58	111.5000	195,125.00	18,658.42
160,000.0000	HUNTSMAN INTERNATIONAL LLC 8.625% 03/15/2021 DD 03/15/11	177,142.94	110.5000	176,800.00	342.94-
200,000.0000	INEOS GROUP HOLDINGS SA 144A 5.875% 02/15/2019 DD 02/18/14	204,952.56	102.5000	205,000.00	47.44
125,000.0000	INTELSAT LUXEMBORURG S A 7.750% 06/01/2021 DD 04/05/13	131,409.03	105.8750	132,343.75	934.72



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<u>SHARES/ PAR VALUE</u>	<u>SECURITY DESCRIPTION</u>	<u>COST</u>	<u>PRICE</u>	<u>MARKET VALUE</u>	<u>UNREALIZED GAIN/LOSS</u>
125,000.0000	INTELSAT JACKSON HOLDINGS SA 7.250% 10/15/2020 DD 09/30/10	132,387.85	107.7500	134,687.50	2,299.65
100,000.0000	INTELSAT JACKSON HOLDINGS SA 7.500% 04/01/2021 DD 10/01/11	101,869.08	109.5000	109,500.00	7,630.92
200,000.0000	IRON MOUNTAIN INC 6.000% 08/15/2023 DD 08/13/13	206,044.17	108.1250	216,250.00	10,205.83
150,000.0000	ISLE OF CAPRI CASINOS INC 7.750% 03/15/2019 DD 03/07/11	152,521.98	106.7500	160,125.00	7,603.02
300,000.0000	ISLE OF CAPRI CASINOS INC 8.875% 06/15/2020 DD 08/07/12	319,123.49	107.2500	321,750.00	2,626.51
156,000.0000	LEAR CORP 8.125% 03/15/2020 DD 03/26/10	157,640.73	107.6250	167,895.00	10,254.27
200,000.0000	LEAR CORP 5.375% 03/15/2024 DD 03/14/14	200,000.00	102.7500	205,500.00	5,500.00
225,000.0000	LEVEL 3 FINANCING INC 8.125% 07/01/2019 DD 01/01/12	241,416.37	109.1250	245,531.25	4,114.88
150,000.0000	LEVEL 3 FINANCING INC 7.000% 06/01/2020 DD 12/01/12	150,000.00	109.2500	163,875.00	13,875.00
100,000.0000	LEVEL 3 FINANCING INC 144A 6.125% 01/15/2021 DD 11/14/13	100,000.00	107.1250	107,125.00	7,125.00
300,000.0000	LEVI STRAUSS & CO 7.625% 05/15/2020 DD 05/06/10	300,000.00	107.6250	322,875.00	22,875.00



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200,000.0000	LINN ENERGY LLC / LINN ENERGY 7.750% 02/01/2021 DD 09/13/10	204,540.57	107.8750	215,750.00	11,209.43
375,000.0000	MDC PARTNERS INC 144A 6.750% 04/01/2020 DD 03/20/13	389,517.32	105.5000	395,625.00	6,107.68
100,000.0000	MGM RESORTS INTERNATIONAL 7.750% 03/15/2022 DD 03/22/12	100,000.00	117.2500	117,250.00	17,250.00
150,000.0000	MEDASSETS INC 8.000% 11/15/2018 DD 05/15/11	151,622.10	105.7500	158,625.00	7,002.90
150,000.0000	MEDIACOM BRDBND LLC/CORP 144A 5.500% 04/15/2021 DD 03/17/14	150,000.00	101.2500	151,875.00	1,875.00
200,000.0000	MIDCONTINENT COMMUNICATIO 144A 6.250% 08/01/2021 DD 07/30/13	200,000.00	103.5000	207,000.00	7,000.00
275,000.0000	MURRAY ENERGY CORP 144A 9.500% 12/05/2020 DD 05/08/14	306,623.71	111.7500	307,312.50	688.79
150,000.0000	NCR CORP 4.625% 02/15/2021 DD 02/15/13	150,329.85	100.7500	151,125.00	795.15
150,000.0000	NRG ENERGY INC 6.625% 03/15/2023 DD 03/15/13	150,000.00	108.2500	162,375.00	12,375.00
200,000.0000	NRG ENERGY INC 144A 6.250% 05/01/2024 DD 04/21/14	200,000.00	104.5000	209,000.00	9,000.00
125,000.0000	NATIONSTAR MORTGAGE LLC / NATI 6.500% 07/01/2021 DD 02/07/13	121,834.16	100.2500	125,312.50	3,478.34



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250,000.0000	NORTH ATLANTIC DRILLING L 144A 6.250% 02/01/2019 DD 01/31/14	250,000.00	98.7500	246,875.00	3,125.00-
200,000.0000	NORTHERN BLIZZARD RESOURC 144A 7.250% 02/01/2022 DD 01/29/14	200,000.00	103.0000	206,000.00	6,000.00
200,000.0000	NUANCE COMMUNICATIONS INC 144A 5.375% 08/15/2020 DD 08/14/12	208,774.90	103.5000	207,000.00	1,774.90-
150,000.0000	OASIS PETROLEUM INC 7.250% 02/01/2019 DD 08/01/11	151,703.03	106.0000	159,000.00	7,296.97
150,000.0000	OMEGA HEALTHCARE INVESTORS INC 6.750% 10/15/2022 DD 04/15/11	153,291.49	108.0700	162,105.00	8,813.51
150,000.0000	PQ CORP 144A 8.750% 05/01/2018 DD 11/08/12	157,936.59	108.6250	162,937.50	5,000.91
200,000.0000	PACIFIC DRILLING SA 144A 5.375% 06/01/2020 DD 06/03/13	200,000.00	98.0000	196,000.00	4,000.00-
250,000.0000	PAR PHARMACEUTICAL COS INC 7.375% 10/15/2020 DD 04/15/13	263,059.79	107.5000	268,750.00	5,690.21
150,000.0000	LIGHTSTREAM RESOURCES LTD 144A 8.625% 02/01/2020 DD 01/30/12	155,059.02	105.0000	157,500.00	2,440.98
200,000.0000	PLY GEM INDUSTRIES INC 144A 6.500% 02/01/2022 DD 01/30/14	200,359.59	96.7500	193,500.00	6,859.59-
125,000.0000	POLYMER GROUP INC 144A 6.875% 06/01/2019 DD 06/11/14	125,627.15	101.6250	127,031.25	1,404.10



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175,000.0000	PRECISION DRILLING CORP 6.500% 12/15/2021 DD 12/15/11	179,121.81	108.7500	190,312.50	11,190.69
175,000.0000	PRESTIGE BRANDS INC 8.125% 02/01/2020 DD 08/01/12	191,500.43	111.5000	195,125.00	3,624.57
250,000.0000	QUEBECOR MEDIA INC 5.750% 01/15/2023 DD 12/15/12	250,000.00	102.7500	256,875.00	6,875.00
300,000.0000	RHP HOTEL PROPERTIES LP / RHP 5.000% 04/15/2021 DD 10/15/13	297,110.24	99.7500	299,250.00	2,139.76
125,000.0000	RSI HOME PRODUCTS INC 144A 6.875% 03/01/2018 DD 02/22/13	128,378.52	106.5000	133,125.00	4,746.48
400,000.0000	REGAL ENTERTAINMENT GRP 5.750% 03/15/2022 DD 03/11/14	407,003.29	103.7500	415,000.00	7,996.71
200,000.0000	RENAISSANCE ACQUISITION C 144A 6.875% 08/15/2021 DD 07/30/13	200,000.00	105.0000	210,000.00	10,000.00
450,000.0000	REYNOLDS GROUP ISSUER INC / RE STEP 05/15/2018 DD 05/15/12	453,457.58	104.6250	470,812.50	17,354.92
100,000.0000	REYNOLDS GROUP ISSUER INC / RE 9.875% 08/15/2019 DD 02/15/12	100,000.00	110.7500	110,750.00	10,750.00
200,000.0000	UNITED RENTALS NORTH AMERICA I 8.250% 02/01/2021 DD 01/19/11	205,366.42	111.2500	222,500.00	17,133.58
200,000.0000	SBA COMMUNICATIONS CORP 5.625% 10/01/2019 DD 04/01/13	205,642.19	105.8750	211,750.00	6,107.81



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200,000.0000	SAFWAY GROUP HOLDING LLC 144A 7.000% 05/15/2018 DD 05/14/13	202,812.38	106.0000	212,000.00	9,187.62
175,000.0000	SALLY HOLDINGS LLC / SALLY CAP 5.750% 06/01/2022 DD 05/18/12	175,000.00	106.5000	186,375.00	11,375.00
250,000.0000	SEADRILL LTD 144A VAR RT 09/15/2017 DD 09/14/12	250,000.00	105.2500	263,125.00	13,125.00
125,000.0000	SERVICE CORP INTERNATIONAL/US 7.625% 10/01/2018 DD 10/03/06	126,423.24	117.2500	146,562.50	20,139.26
200,000.0000	SERVICE CORP INTL 144A 5.375% 05/15/2024 DD 05/12/14	200,000.00	102.2500	204,500.00	4,500.00
150,000.0000	SIGNODE INDUSTRIAL GROUP 144A 6.375% 05/01/2022 DD 04/29/14	150,000.00	101.2500	151,875.00	1,875.00
75,000.0000	SINCLAIR TELEVISION GROUP INC 5.375% 04/01/2021 DD 04/02/13	74,364.92	100.6250	75,468.75	1,103.83
200,000.0000	SINCLAIR TELEVISION GROUP INC 6.125% 10/01/2022 DD 04/01/13	200,000.00	104.5000	209,000.00	9,000.00
300,000.0000	SIRIUS XM RADIO INC 144A 6.000% 07/15/2024 DD 05/06/14	300,000.00	104.0000	312,000.00	12,000.00
150,000.0000	SONIC AUTOMOTIVE INC 5.000% 05/15/2023 DD 05/09/13	151,631.09	98.2500	147,375.00	4,256.09-
100,000.0000	SPECTRUM BRANDS INC 6.625% 11/15/2022 DD 11/15/13	100,000.00	108.2500	108,250.00	8,250.00



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100,000.0000	SPRINT NEXTEL CORP 144A 7.000% 03/01/2020 DD 03/01/12	100,000.00	115.0000	115,000.00	15,000.00
100,000.0000	SPRINT NEXTEL CORP 7.000% 08/15/2020 DD 08/14/12	100,000.00	110.6250	110,625.00	10,625.00
150,000.0000	SPRINT NEXTEL CORP 6.000% 11/15/2022 DD 11/14/12	150,000.00	102.0000	153,000.00	3,000.00
200,000.0000	SPRINT CORP 144A 7.875% 09/15/2023 DD 09/11/13	200,000.00	111.2500	222,500.00	22,500.00
100,000.0000	SPRINT CORP 144A 7.125% 06/15/2024 DD 12/12/13	107,839.85	106.0000	106,000.00	1,839.85-
200,000.0000	SUBURBAN PROPANE PARTNRS 5.500% 06/01/2024 DD 05/27/14	201,993.62	101.2500	202,500.00	506.38
350,000.0000	SUNGARD DATA SYSTEMS INC 7.625% 11/15/2020 DD 11/16/10	357,964.20	109.0000	381,500.00	23,535.80
350,000.0000	T-MOBILE USA INC 6.633% 04/28/2021 DD 07/28/13	350,000.00	108.2500	378,875.00	28,875.00
250,000.0000	TW TELECOM HOLDINGS INC 5.375% 10/01/2022 DD 10/02/12	252,916.64	109.3750	273,437.50	20,520.86
150,000.0000	TW TELECOM HOLDINGS INC 6.375% 09/01/2023 DD 08/26/13	160,284.26	113.7500	170,625.00	10,340.74
99,250.0000	ALLFLEX 7/13 TL	99,250.00	100.0210	99,270.84	20.84
200,000.0000	TELESAT CANADA / TELESAT 144A 6.000% 05/15/2017 DD 05/14/12	207,109.08	103.1250	206,250.00	859.08-



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285,000.0000	TENET HEALTHCARE CORP 8.000% 08/01/2020 DD 08/17/10	289,735.38	108.3750	308,868.75	19,133.37
175,000.0000	TEREX CORP 6.000% 05/15/2021 DD 11/26/12	175,000.00	107.7500	188,562.50	13,562.50
200,000.0000	TOWNSQUARE RADIO LLC / TO 144A 9.000% 04/01/2019 DD 04/04/12	211,558.33	110.7500	221,500.00	9,941.67
225,000.0000	TRANSDIGM INC 7.500% 07/15/2021 DD 07/01/13	225,000.00	110.7500	249,187.50	24,187.50
200,000.0000	TRANSDIGM INC 144A 6.500% 07/15/2024 DD 06/04/14	200,000.00	104.1250	208,250.00	8,250.00
125,000.0000	TRINIDAD DRILLING LTD 144A 7.875% 01/15/2019 DD 12/16/10	132,055.13	105.7500	132,187.50	132.37
300,000.0000	TRINSEO OP / TRINSEO FIN 8.750% 02/01/2019 DD 02/01/14	313,338.97	107.7500	323,250.00	9,911.03
150,000.0000	TRONOX FINANCE LLC 6.375% 08/15/2020 DD 08/15/13	151,889.28	103.2500	154,875.00	2,985.72
250,000.0000	UPCB FINANCE VI LTD 144A 6.875% 01/15/2022 DD 02/07/12	250,000.00	109.2500	273,125.00	23,125.00
100,000.0000	USG CORP 144A 5.875% 11/01/2021 DD 10/31/13	100,000.00	106.0000	106,000.00	6,000.00
225,000.0000	UNIT CORP 6.625% 05/15/2021 DD 05/18/11	222,670.34	106.7500	240,187.50	17,517.16



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150,000.0000	UNITED RENTALS NORTH AMERICA I 7.375% 05/15/2020 DD 11/15/12	150,460.74	110.5000	165,750.00	15,289.26
69,000.0000	UNIVISION COMMUNICATIONS 144A 6.750% 09/15/2022 DD 08/29/12	74,834.97	110.6250	76,331.25	1,496.28
250,000.0000	VALEANT PHARMACEUTICALS I 144A 6.750% 10/01/2017 DD 09/28/10	242,357.61	104.2500	260,625.00	18,267.39
250,000.0000	VIASAT INC 6.875% 06/15/2020 DD 06/15/12	251,795.00	107.7500	269,375.00	17,580.00
134,000.0000	VIRGIN MEDIA FINANCE PLC 8.375% 10/15/2019 DD 11/09/09	133,653.47	105.7500	141,705.00	8,051.53
200,000.0000	VP II ESCROW CORP 144A 7.500% 07/15/2021 DD 07/12/13	200,000.00	110.7500	221,500.00	21,500.00
250,000.0000	WMG ACQUISITION CORP 144A 5.625% 04/15/2022 DD 04/09/14	250,370.67	100.6250	251,562.50	1,191.83
150,000.0000	WMG ACQUISITION CORP 144A 6.750% 04/15/2022 DD 04/09/14	150,733.58	100.0000	150,000.00	733.58-
250,000.0000	WEST CORP 8.625% 10/01/2018 DD 07/15/11	258,220.96	106.2500	265,625.00	7,404.04
200,000.0000	WEST CORP 5.375% 07/15/2022 DD 07/01/14	200,000.00	99.0000	198,000.00	2,000.00-
300,000.0000	WIDEOPENWEST FINANCE LLC / WID 10.250% 07/15/2019 DD 01/15/13	320,111.50	112.3750	337,125.00	17,013.50



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250,000.0000	WIND ACQUISITION FIN SA 144A 4.750% 07/15/2020 DD 07/10/14	250,000.00	100.7500	251,875.00	1,875.00
350,000.0000	WINDSTREAM CORP 7.750% 10/15/2020 DD 10/06/10	362,830.94	108.3750	379,312.50	16,481.56
200,000.0000	WISE METALS GROUP LLC / W 144A 8.750% 12/15/2018 DD 12/11/13	200,000.00	108.5000	217,000.00	17,000.00
100,000.0000	MALLINCKRODT 4/14 BRIDGE	100,000.00	100.0000	100,000.00	0.00
400,000.0000	AMERICAN ENERGY BRIDGE LOAN A	400,000.00	100.0000	400,000.00	0.00
TOTAL INVESTMENTS FIXED INCOME SECURITIES		36,752,038.82		38,188,268.89	1,436,230.07
TOTAL INVESTMENT		38,077,060.07		39,513,290.14	1,436,230.07



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<u>INVESTMENTS CASH EQUIVALENTS</u>					
0.0700	FIDELITY INSTL MM PRIME 690	0.07	100.0000	0.07	0.00
TOTAL INVESTMENTS CASH EQUIVALENTS		0.07		0.07	0.00
TOTAL INVESTMENT		0.07		0.07	0.00



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<u>INVESTMENTS CASH EQUIVALENTS</u>					
0.0700	FIDELITY INSTL MM PRIME 690	0.07	100.0000	0.07	0.00
TOTAL INVESTMENTS CASH EQUIVALENTS		0.07		0.07	0.00
TOTAL INVESTMENT		0.07		0.07	0.00



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<u>INVESTMENTS CASH EQUIVALENTS</u>					
0.0700	FIDELITY INSTL MM PRIME 690	0.07	100.0000	0.07	0.00
TOTAL INVESTMENTS CASH EQUIVALENTS		0.07		0.07	0.00
<u>INVESTMENTS EQUITY</u>					
630,875.7620	PARAMETRIC TAX-MANAGED EMERGIN	29,710,972.45	52.4200	33,070,507.44	3,359,534.99
TOTAL INVESTMENTS EQUITY		29,710,972.45		33,070,507.44	3,359,534.99
TOTAL INVESTMENT		29,710,972.52		33,070,507.51	3,359,534.99



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<u>INVESTMENTS CASH EQUIVALENTS</u>					
0.0100	AUD (AUSTRALIAN DOLLARS)	0.01	0.0000	0.01	0.00
33.2600	NZD (NEW ZEALAND DOLLAR)	28.81	0.0000	29.12	0.31 C
327.5500	CHF (SWISS FRANC)	367.69	0.0000	369.36	1.67 C
9,984.9900	GBP (GREAT BRITISH POUNDS)	16,962.52	0.0000	17,072.84	110.32 C
34,735.4200	HKD (HONG KONG DOLLARS)	4,481.06	0.0000	4,481.79	0.73 C
6,510,577.0000	JPY (JAPANESE YEN)	64,241.44	0.0000	64,267.08	25.64 C
6,274.3900	SGD (SINGAPORE DOLLARS)	5,017.85	0.0000	5,033.00	15.15 C
2,844.0900	ILS (ISRAELI SHEKEL)	822.95	0.0000	829.48	6.53 C
41.5500	DKK (DANISH KRONE)	7.60	0.0000	7.63	0.03 C
11,920.8900	NOK (NORWEGIAN KRONE)	1,945.93	0.0000	1,942.68	3.25-C
5,942.6700	SEK (SWEDISH KRONA)	889.93	0.0000	888.91	1.02-C
25,467.5900	EUR (EURO)	34,663.28	0.0000	34,868.95	205.67 C
46,500.3800	FIDELITY INSTL MM PRIME 690	46,500.38	100.0000	46,500.38	0.00
TOTAL INVESTMENTS CASH EQUIVALENTS		175,929.45		176,291.23	361.78 361.78 C 0.00 I



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<u>INVESTMENTS PREFERRED SECURITIES</u>					
244.0000	RWE AG PFD	20,245.21	33.2703	8,117.96	12,127.25-
					91.31 C 12,218.56- I
886.0000	HENKEL AG & CO KGAA PFD	48,780.90	115.5973	102,419.24	53,638.34
					1,152.01 C 52,486.33 I
829.0000	VOLKSWAGEN AG PFD	93,370.33	262.6029	217,697.86	124,327.53
					1,185.72 C 123,141.81 I
540.0000	BAYERISCHE MOTOREN WERKE-PRF PFD	36,574.67	95.8541	51,761.26	15,186.59
					173.49- C 15,360.08 I
1,053.0000	PORSCHE AUTOMOBIL HOLDING SE PFD	74,398.58	104.1786	109,700.09	35,301.51
					489.49- C 35,791.00 I
1,447,200.0000	ROLLS-ROYCE HOLDINGS C SHS ENTITLEMENT (JULY 2014)	2,428.11	0.0017	2,474.49	46.38 C
TOTAL INVESTMENTS PREFERRED SECURITIES		275,797.80		492,170.90	216,373.10 1,812.44 C 214,560.66 I



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<u>INVESTMENTS EQUITY</u>					
2,066.0000	RECALL HOLDINGS LTD	7,838.59	4.5116	9,320.97	1,482.38 293.30 C 1,189.08 I
6,591.0000	ORORA LTD	6,791.93	1.3449	8,864.81	2,072.88 521.27 C 1,551.61 I
30,720.0000	SCENTRE GROUP	92,604.05	3.0203	92,784.23	180.18 471.85 C 291.67- I
10,955.0000	WESTFIELD CORP NPV STAPLED UNITS	118,044.03	6.7485	73,930.12	44,113.91- 587.81 C 44,701.72- I
8,849.0000	TATTS GROUP LTD	19,974.05	3.0863	27,311.46	7,337.41 665.54 C 6,671.87 I
986.0000	SIMS METAL MANAGEMENT LTD	20,112.25	9.1364	9,008.56	11,103.69- 219.52 C 11,323.21- I
3,458.0000	AGL ENERGY NPV	51,323.79	14.6107	50,524.14	799.65- 1,077.05- C 277.40 I
6,699.0000	GOODMAN LTD (STAPLED UNITS)	20,213.44	4.7664	31,930.40	11,716.96 778.09 C 10,938.87 I



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27,045.0000	DEXUS PROPERTY GROUP NPV (STAPLED)	20,182.63	1.0476	28,334.33	8,151.70
					690.47 C 7,461.23 I
5,183.0000	METCASH LIMITED NPV	20,007.89	2.4917	12,914.81	7,093.08- 314.71 C 7,407.79- I
2,405.0000	SEEK LIMITED NPV	29,332.26	14.9600	35,978.85	6,646.59 495.56- C 7,142.15 I
10,331.0000	BRAMBLES LTD NPV	78,087.99	8.6739	89,610.90	11,522.91 878.11 C 10,644.80 I
4,607.0000	ASCIANO LTD	23,685.89	5.3138	24,481.02	795.13 596.56 C 198.57 I
1,561.0000	MACQUARIE GROUP LIMITED NPV	71,788.46	56.2817	87,855.85	16,067.39 2,140.89 C 13,926.50 I
2,648.0000	CROWN RESORTS LTD	19,761.00	14.2710	37,789.64	18,028.64 920.87 C 17,107.77 I
3,137.0000	ECHO ENTERTAINMENT GROUP LTD	14,633.92	2.9636	9,297.09	5,336.83- 1,266.25- C 4,070.58- I



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1,790.0000	DULUXGROUP LTD	3,911.37	5.3421	9,562.52	5,651.15 707.18 C 4,943.97 I
2,389.0000	DART ENERGY LTD	1,346.64	0.1698	405.87	940.77- 9.78 C 950.55- I
3,045.0000	JAMES HARDIE INDUSTRIES PLC	20,086.60	13.0628	39,776.48	19,689.88 969.27 C 18,720.61 I
3,198.0000	TREASURY WINE ESTATES LTD	11,107.11	4.7286	15,122.35	4,015.24 2,209.43- C 6,224.67 I
6,606.0000	ARRIUM LTD	24,101.25	0.7503	4,956.88	19,144.37- 120.79 C 19,265.16- I
1,232.0000	SHOPPING CENTRES AUSTRALASIA	1,810.16	1.6234	2,000.06	189.90 214.86- C 404.76 I
1,460.0000	ALS LTD	19,922.93	8.3625	12,209.27	7,713.66- 1,241.81- C 6,471.85- I
15,943.0000	AURIZON HOLDINGS LTD	49,791.33	4.7003	74,938.05	25,146.72 5,494.33- C 30,641.05 I
8,416.0000	FEDERATION CENTRES	19,569.27	2.3501	19,779.17	209.90 429.60- C 639.50 I



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1,434.0000	RAMSAY HEALTH CARE LTD AUD0.10	29,788.66	42.9451	61,583.38	31,794.72 1,976.99- C 33,771.71 I
15,280.0000	AUSTRALIA & NEW ZEALAND BANK GROUP NPV	370,144.71	31.4679	480,830.41	110,685.70 6,623.14 C 104,062.56 I
6,591.0000	AMCOR LIMITED NPV	47,316.70	9.8443	64,884.15	17,567.45 4,476.40- C 22,043.85 I
18,664.0000	WESTPAC BANKING CORP NPV	502,132.51	31.9776	596,830.64	94,698.13 8,458.49 C 86,239.64 I
6,155.0000	FORTESCUE METALS G NPV	28,183.21	4.1057	25,270.88	2,912.33- 615.81 C 3,528.14- I
26,059.0000	TELSTRA CORP NPV	80,011.56	4.9174	128,144.05	48,132.49 995.93- C 49,128.42 I
2,202.0000	BENDIGO & ADELAIDE BK LTD NPV	20,388.69	11.5149	25,355.96	4,967.27 617.89 C 4,349.38 I
10,646.0000	LYNAS CORP LTD	21,797.55	0.1227	1,306.27	20,491.28- 172.72- C 20,318.56- I



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2,791.0000	COCA-COLA AMATIL NPV	28,670.86	8.9288	24,920.34	3,750.52- 607.26 C 4,357.78- I
857.0000	ASX LTD NPV	26,758.29	33.6388	28,828.46	2,070.17 702.50 C 1,367.67 I
18,171.0000	BHP BILLITON LIMITED	729,468.55	33.8842	615,710.07	113,758.48- 13,336.55 C 127,095.03- I
14,514.0000	MIRVAC GROUP STAPLED SHS	19,522.98	1.6847	24,452.78	4,929.80 595.87 C 4,333.93 I
5,949.0000	HARVEY NORMAN HLDGS NPV (POST SPLIT)	20,005.20	2.9259	17,406.39	2,598.81- 424.17 C 3,022.98- I
2,211.0000	COMPUTERSHARE NPV (DFD 1 POST REC)	25,727.53	11.7792	26,043.92	316.39 634.64 C 318.25- I
2,801.0000	CSL ORD NPV	93,417.38	62.8132	175,939.82	82,522.44 4,287.34 C 78,235.10 I
10,174.0000	TRANSURBAN GROUP NPV	56,824.35	6.9750	70,964.17	14,139.82 330.63 C 13,809.19 I



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299.0000	COCHLEAR LTD COM	19,960.68	58.2355	17,412.43	2,548.25- 424.32 C 2,972.57- I
6,137.0000	ORIGIN ENERGY LTD NPV (POST RECONSTRUCTION)	87,124.03	13.7990	84,685.00	2,439.03- 1,921.10 C 4,360.13- I
9,414.0000	COMMONWEALTH BANK OF AUSTRALIA ORD NPV	513,415.03	76.3385	718,651.47	205,236.44 5,067.12 C 200,169.32 I
4,592.0000	BORAL LIMITED NEW NPV	19,816.21	4.9552	22,754.34	2,938.13 554.50 C 2,383.63 I
2,167.0000	RIO TINTO LIMITED NPV	158,919.78	55.9797	121,308.10	37,611.68- 2,956.07 C 40,567.75- I
4,345.0000	CSR ORD NPV	15,332.27	3.2940	14,312.59	1,019.68- 803.95 C 1,823.63- I
3,660.0000	APA GROUP NPV	19,523.87	6.5031	23,801.44	4,277.57 2,420.87- C 6,698.44 I
10,339.0000	INSURANCE AUSTRALIA GROUP PLC	37,339.68	5.5120	56,989.44	19,649.76 1,388.73 C 18,261.03 I



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1,944.0000	BILLABONG INTERNATIONAL NPV	20,095.34	0.4719	917.42	19,177.92- 22.35 C 19,200.27- I
11,489.0000	CFS RETAIL PROPERTY TRUST GROUP	19,793.83	1.9254	22,121.54	2,327.71 539.06 C 1,788.65 I
9,227.0000	GPT GROUP	24,866.84	3.6243	33,442.19	8,575.35 814.93 C 7,760.42 I
1,852.0000	OZ MINERALS LTD AUD0.4	17,958.58	3.8603	7,149.36	10,809.22- 288.26 C 11,097.48- I
1,790.0000	ORICA LIMITED	44,362.02	18.3861	32,911.29	11,450.73- 801.99 C 12,252.72- I
12,095.0000	FAIRFAX MEDIA LTD NPV	20,002.14	0.8541	10,331.36	9,670.78- 251.76 C 9,922.54- I
464.0000	LEIGHTON HOLDINGS LTD ORD A\$0.50	16,727.61	18.6221	8,640.68	8,086.93- 210.56 C 8,297.49- I
2,672.0000	LEND LEASE GROUP NPV	21,367.92	12.3738	33,062.99	11,695.07 805.69 C 10,889.38 I



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1,511.0000	BLUESCOPE STEEL LTD	24,726.43	5.1156	7,729.77	16,996.66- 188.36 C 17,185.02- I
853.0000	WORLEYPARSONS LTD NPV	20,110.61	16.4324	14,016.86	6,093.75- 341.56 C 6,435.31- I
6,320.0000	SUNCORP GROUP LIMITED	50,424.43	12.7797	80,767.89	30,343.46 1,968.18 C 28,375.28 I
13,048.0000	NATL AUSTRALIA BK NPV	353,085.51	30.9394	403,697.33	50,611.82 4,910.71 C 45,701.11 I
3,257.0000	NEWCREST MINING LTD ORD NPV	106,850.26	9.9293	32,339.74	74,510.52- 582.92 C 75,093.44- I
5,442.0000	PALADIN ENERGY LTD	21,057.85	0.2784	1,515.25	19,542.60- 36.93 C 19,579.53- I
8,018.0000	INCITEC PIVOT NPV	25,707.00	2.7371	21,946.59	3,760.41- 534.79 C 4,295.20- I
3,303.0000	TOLL HLDGS LIMITED NPV	22,610.15	4.8136	15,899.44	6,710.71- 387.44 C 7,098.15- I
13,939.0000	AMP LIMITED AUS0.40	76,049.37	5.0024	69,728.52	6,320.85- 2,895.51 C 9,216.36- I



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7,585.0000	QANTAS AIRWAYS NPV	19,846.32	1.1892	9,020.47	10,825.85- 219.81 C 11,045.66- I
7,282.0000	QBE INS GROUP A\$1	128,870.66	10.2596	74,710.77	54,159.89- 1,170.74 C 55,330.63- I
6,601.0000	SANTOS LIMITED NPV	86,026.34	13.4593	88,844.85	2,818.51 2,368.20 C 450.31 I
1,834.0000	SONIC HEALTHCARE LTD ORD A\$0.20	24,331.44	16.3569	29,998.59	5,667.15 731.01 C 4,936.14 I
11,850.0000	STOCKLAND TRUST GROUP NPV (STAPLED)	43,015.06	3.6621	43,396.34	381.28 1,057.50 C 676.22- I
3,137.0000	TAB CORP HLDGS LIMITED NPV	20,028.75	3.1713	9,948.48	10,080.27- 242.42 C 10,322.69- I
6,417.0000	WESFARMERS ORD NPV	195,046.56	39.4906	253,411.72	58,365.16 4,692.24 C 53,672.92 I
12,620.0000	ALUMINA LTD NPV	20,521.55	1.2741	16,080.37	4,441.18- 391.85 C 4,833.03- I



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1,127.0000	ILUKA RESOURCES LIMITED	20,544.75	7.6735	8,648.04	11,896.71- 1,143.47- C 10,753.24- I
3,286.0000	WOODSIDE PETROLEUM NPV	145,671.28	38.7639	127,378.24	18,293.04- 365.43- C 17,927.61- I
7,066.0000	WOOLWORTHS LIMITED ORD A\$0.25	190,160.87	33.2423	234,890.78	44,729.91 4,353.69 C 40,376.22 I
7,651.0000	AUCKLAND INTERNATIONAL AIRPORT LTD	21,039.75	3.4146	26,125.45	5,085.70 2,563.16 C 2,522.54 I
2,608.0000	CHORUS LTD	4,652.19	1.5190	3,961.76	690.43- 763.12 C 1,453.55- I
4,988.0000	FLETCHER BUILDING NPV	29,421.68	7.7135	38,475.41	9,053.73 7,411.21 C 1,642.52 I
13,044.0000	TELECOM CORP OF NEW ZEALAND NPV	15,274.71	2.3464	30,607.41	15,332.70 5,895.64 C 9,437.06 I
244.0000	BUWOG AG	4,465.43	19.3187	4,713.76	248.33 52.68- C 301.01 I



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376.0000	VIENNA INSURANCE GROUP NPV(BR)	19,927.52	53.5200	20,123.55	196.03 226.35 C 30.32- I
421.0000	RAIFFEISEN BANK INTERNATIONAL HOLDING AG	20,208.37	31.9217	13,439.06	6,769.31- 151.17 C 6,920.48- I
326.0000	ANDRITZ AG NPV (POST SPLIT)	21,623.20	57.7849	18,837.90	2,785.30- 350.85 C 3,136.15- I
1,543.0000	TELEKOM AUSTRIA (TA) NPV	21,713.87	9.7757	15,083.95	6,629.92- 169.66 C 6,799.58- I
746.0000	OMV AG NPV	28,806.57	45.1819	33,705.73	4,899.16 379.11 C 4,520.05 I
513.0000	VERBUND AG	20,531.96	19.3666	9,935.09	10,596.87- 111.75 C 10,708.62- I
1,254.0000	VOESTALPINE AG	43,652.24	47.5848	59,671.35	16,019.11 1,880.19 C 14,138.92 I
1,654.0000	ERSTE GROUP BANK AG	59,603.11	32.3393	53,489.24	6,113.87- 1,189.01 C 7,302.88- I



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4,887.0000	IMMOFINANZ AG NPV	16,810.90	3.5324	17,262.87	451.97 781.06 C 329.09- I
809.0000	TELENET GROUP HOLDING NPV	43,365.63	56.9840	46,100.07	2,734.44 269.37- C 3,003.81 I
756.0000	BELGACOM NPV	29,714.93	33.1813	25,085.10	4,629.83- 282.16 C 4,911.99- I
1,110.0000	AGEAS NV	38,090.88	39.8901	44,278.11	6,187.23 522.64 C 5,664.59 I
579.0000	UMICORE NPV	21,060.05	46.4552	26,897.60	5,837.55 302.54 C 5,535.01 I
502.0000	DELHAIZE GROUP	41,284.88	67.6497	33,960.15	7,324.73- 381.98 C 7,706.71- I
1,363.0000	KBC GROUPE NPV	69,828.72	54.4237	74,179.52	4,350.80 270.09 C 4,080.71 I
4,487.0000	ANHEUSER-BUSCH INBEV NV	244,048.91	114.8716	515,429.25	271,380.34 1,449.01 C 269,931.33 I
295.0000	SOLVAY NPV	30,801.76	172.1021	50,770.14	19,968.38 571.07 C 19,397.31 I



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333.0000	MOBISTAR NPV	20,600.53	19.0859	6,355.62	14,244.91- 71.48 C 14,316.39- I
502.0000	UCB S A NPV	21,798.31	84.6545	42,496.58	20,698.27 478.00 C 20,220.27 I
441.0000	COLRUYT SA NPV	19,851.03	50.7954	22,400.80	2,549.77 2,370.72 C 179.05 I
187.0000	BEKAERT SA	20,341.01	37.3572	6,985.81	13,355.20- 301.54 C 13,656.74- I
401.0000	GROUPE BRUXELLES L NPV	35,748.50	103.9047	41,665.82	5,917.32 468.65 C 5,448.67 I
3,703.0000	DEXIA NPV	20,246.47	0.0397	147.03	20,099.44- 1.65 C 20,101.09- I
621.0000	PROSIEBENSAT1 MEDI	29,592.34	44.5452	27,662.64	1,929.70- 189.91- C 1,739.79- I
2,062.0000	DEUTSCHE WOHNEN AG NPV (BR)	40,751.08	21.5641	44,465.20	3,714.12 259.81- C 3,973.93 I
799.0000	LANXESS AG NPV	59,725.81	67.4922	53,926.31	5,799.50- 939.55 C 6,739.05- I



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3,364.0000	SKY DEUTSCHLAND AG	30,011.75	9.2116	30,987.96	976.21 63.37- C 1,039.58 I
136.0000	WACKER CHEMIE AG NPV (BR)	20,630.64	115.4604	15,702.62	4,928.02- 176.62 C 5,104.64- I
229.0000	KABEL DEUTSCHLAND HOLDING AG	30,574.32	146.4305	33,532.61	2,958.29 195.94- C 3,154.23 I
219.0000	BRENNTAG AG	20,642.14	178.6740	39,129.62	18,487.48 2,726.48 C 15,761.00 I
857.0000	K + S AG SHS	51,449.97	32.8801	28,178.28	23,271.69- 316.94 C 23,588.63- I
245.0000	HUGO BOSS AG	31,713.19	149.4427	36,613.47	4,900.28 251.36- C 5,151.64 I
6,076.0000	COMMERZBANK AG	103,659.82	15.7178	95,501.61	8,158.21- 812.98- C 7,345.23- I
413.0000	OSRAM LICHT AG	12,028.39	50.4326	20,828.69	8,800.30 228.93 C 8,571.37 I
1,041.0000	ADIDAS AG	56,595.73	101.2760	105,428.34	48,832.61 1,185.83 C 47,646.78 I



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690.0000	FRESENIUS SE & CO KGAA	52,179.03	149.1004	102,879.30	50,700.27 1,157.15 C 49,543.12 I
1,307.0000	UNITED INTERNET AG NPV REGD	20,278.07	44.0524	57,576.50	37,298.43 647.60 C 36,650.83 I
402.0000	HANNOVER RUECKVERSICHERUNG SE	20,341.76	90.1037	36,221.71	15,879.95 407.41 C 15,472.54 I
874.0000	GEA GROUP AG NPV	20,846.18	47.3452	41,379.71	20,533.53 465.43 C 20,068.10 I
572.0000	CONTINENTAL AG NPV	58,728.03	231.5917	132,470.47	73,742.44 6,319.92 C 67,422.52 I
5,079.0000	DEUTSCHE POST AG NPV (REGD)	104,328.04	36.1592	183,652.84	79,324.80 1,118.53 C 78,206.27 I
644.0000	MERCK KGAA NPV	26,167.53	86.7904	55,893.03	29,725.50 628.67 C 29,096.83 I
2,900.0000	RWE AG (NEU) NPV 'A'	217,705.83	42.9433	124,535.83	93,170.00- 1,087.47 C 94,257.47- I
5,131.0000	SAP SE ORD NPV	272,649.73	77.2200	396,216.13	123,566.40 4,621.60 C 118,944.80 I



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10,951.0000	E.ON SE NPV	367,093.01	20.6467	226,102.91	140,990.10- 2,119.07 C 143,109.17- I
646.0000	HENKEL AG & CO KGAA NPV(BR)	30,417.97	100.6325	65,008.61	34,590.64 731.22 C 33,859.42 I
565.0000	METRO AG ORD NPV	34,214.38	43.5800	24,622.73	9,591.65- 276.96 C 9,868.61- I
4,605.0000	BAYER AG ORD NPV	344,119.12	141.2278	650,354.12	306,235.00 5,223.51 C 301,011.49 I
5,115.0000	BASF SE	347,893.90	116.4188	595,482.29	247,588.39 4,954.12 C 242,634.27 I
634.0000	CELESIO AG	20,523.09	35.5979	22,569.07	2,045.98 253.86 C 1,792.12 I
439.0000	BEIERSDORF AG NPV	26,432.66	96.7578	42,476.69	16,044.03 477.77 C 15,566.26 I
239.0000	HOCHTIEF AG NPV	20,642.86	86.5439	20,684.01	41.15 232.65 C 191.50- I
700.0000	HEIDELBERGCEMENT AG	39,914.96	85.3391	59,737.38	19,822.42 671.92 C 19,150.50 I



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1,402.0000	FRESENIUS MEDICAL CARE AG & CO KGAA	84,184.93	67.2115	94,230.63	10,045.70
					451.27 C 9,594.43 I
2,433.0000	ALLIANZ SE (SOCIETAS EUROPEAE)	317,216.22	166.6255	405,399.98	88,183.76
					3,882.76 C 84,301.00 I
1,196.0000	DEUTSCHE LUFTHANSA AG ORD NPV REGD VINK	20,491.66	21.4682	25,676.05	5,184.39
					288.80 C 4,895.59 I
982.0000	MUENCHENER RUECKVERSICHERUNGS G NPV REGD	161,866.74	221.6653	217,675.41	55,808.67
					2,448.38 C 53,360.29 I
219.0000	SALZGITTER AG ORD NPV	20,490.46	42.0876	9,217.20	11,273.26-
					103.68 C 11,376.94- I
212.0000	VOLKSWAGEN AG ORD NPV	20,559.11	258.4955	54,801.05	34,241.94
					616.41 C 33,625.53 I
5,357.0000	DAIMLER AG ORD NPV (REGD)	286,138.73	93.6498	501,682.30	215,543.57
					3,416.54 C 212,127.03 I
526.0000	MAN SE ORD NPV	44,419.92	123.5657	64,995.60	20,575.68
					731.06 C 19,844.62 I



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1,663.0000	THYSSENKRUPP AG NPV	58,269.90	29.1492	48,475.13	9,794.77- 545.24 C 10,340.01- I
4,416.0000	SIEMENS AG NPV REGD	449,701.63	132.0545	583,152.75	133,451.12 5,544.37 C 127,906.75 I
1,150.0000	QIAGEN NV	26,798.35	24.2339	27,869.05	1,070.70 313.47 C 757.23 I
1,024.0000	LINDE AG NPV	130,701.50	212.6289	217,732.09	87,030.59 9,242.82 C 77,787.77 I
7,744.0000	DEUTSCHE BANK AG ORD NPV REGD	436,530.92	35.1803	272,436.31	164,094.61- 2,013.06 C 166,107.67- I
1,908.0000	BAYERISCHE MOTOREN WERKE (BMW) AG EUR1	108,080.58	126.8106	241,954.76	133,874.18 1,534.58 C 132,339.60 I
17,710.0000	DEUTSCHE TELEKOM AG NPV (REGD)	251,237.07	17.5251	310,369.88	59,132.81 2,671.46 C 56,461.35 I
5,405.0000	INFINEON TECHNOLOGIES ORD NPV	37,774.69	12.4989	67,556.94	29,782.25 759.87 C 29,022.38 I



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969.0000	DEUTSCHE BOERSE AG NPV	73,024.15	77.6034	75,197.72	2,173.57 845.81 C 1,327.76 I
378.0000	FRAPORT AG NPV	20,141.04	70.6481	26,705.00	6,563.96 300.37 C 6,263.59 I
7,055.0000	BANCO POPULAR ESPANOL SA	50,193.08	6.6814	47,137.64	3,055.44- 32.24- C 3,023.20- I
1,094.0000	ACERINOX SA EUR0.25 (STK DIV 08-JUL-2014)	669.36	0.6065	663.54	5.82- 4.59 C 10.41- I
704.0000	ACS ACTIVIDADES CO EUR0.5	33,468.43	45.7296	32,193.65	1,274.78- 362.12 C 1,636.90- I
1,328.0000	GRIFOLS SA EUR0.5	17,801.55	54.6496	72,574.70	54,773.15 816.33 C 53,956.82 I
1,094.0000	ACERINOX SA EUR0.25	21,155.23	17.7168	19,382.18	1,773.05- 221.67 C 1,994.72- I
2,188.0000	FERROVIAL SA EUR0.2	21,734.20	22.2692	48,725.06	26,990.86 548.05 C 26,442.81 I



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5,486.0000	MAPFRE SA EUR0.10	20,493.02	3.9855	21,864.98	1,371.96 245.92 C 1,126.04 I
18,027.0000	BANCO DE SABADELL SA NEW EUR0.125 (POST SPLIT 20)	51,242.75	3.4119	61,506.71	10,263.96 2,092.67 C 8,171.29 I
9,844.0000	CAIXABANK	55,613.38	6.1707	60,744.95	5,131.57 111.29- C 5,242.86 I
26,456.0000	IBERDROLA SA EUR0.75 (POST SUBDIVISION)	206,700.07	7.6439	202,228.73	4,471.34- 1,996.78 C 6,468.12- I
2,028.0000	AMADEUS IT HLD SA-A SHS0.0100	59,173.14	41.2387	83,632.28	24,459.14 848.11 C 23,611.03 I
5,079.0000	INTERNATIONAL CONSOLIDATED AIRLINES GROUP SA	28,363.87	6.3405	32,203.57	3,839.70 221.09- C 4,060.79 I
2,461.0000	DISTRIBUIDORA INTERNACIONAL DE ALIMENTACION SA	12,102.61	9.2061	22,656.37	10,553.76 1,278.32- C 11,832.08 I
22,447.0000	BANKIA SA	44,331.80	1.9387	43,518.36	813.44- 628.05- C 185.39- I



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2,403.0000	ABERTISINFRAESTRUCTURAS SA EUR3	41,794.90	23.0085	55,289.59	13,494.69
					715.12 C 12,779.57 I
973.0000	INDRA SISTEMAS SA EUR0.20	20,222.53	17.8674	17,384.99	2,837.54- 195.55 C 3,033.09- I
2,381.0000	BANKINTER S A EUR0.3 REGD	12,974.19	7.8246	18,630.60	5,656.41 209.56 C 5,446.85 I
32,194.0000	BANCO BILBAO VIZCAYA ARGENTARIA SA EUR0.49	381,486.60	12.7454	410,325.97	28,839.37
					7,453.98 C 21,385.39 I
178.0000	ACCIONA SA EUR1.00	20,193.53	89.4328	15,919.05	4,274.48- 179.05 C 4,453.53- I
2,356.0000	GAS NAT SDG SA EUR1	44,637.35	31.5794	74,401.17	29,763.82 2,662.82 C 27,101.00 I
4,499.0000	REPSOL SA	106,342.87	26.3698	118,637.86	12,294.99 406.59 C 11,888.40 I
63,531.0000	BANCO SANTANDER SA	725,645.81	10.4466	663,683.87	61,961.94- 10,774.87 C 72,736.81- I



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539.0000	RED ELECTRICA CORPORATION SA EUR2	28,927.69	91.4592	49,296.52	20,368.83
					554.48 C 19,814.35 I
22,809.0000	TELEFONICA SA EUR1	523,631.45	17.1417	390,986.36	132,645.09- 4,087.01 C 136,732.10- I
1,230.0000	INDUSTRIA DE DISENO TEXTIL SA EUR0.15	93,480.23	153.8924	189,287.73	95,807.50
					3,666.17 C 92,141.33 I
916.0000	ENAGAS SA EUR1.50	20,563.85	32.1750	29,472.32	8,908.47 331.50 C 8,576.97 I
756.0000	PEUGEOT SA WTS EXP 29-APR-2017	2,353.52	2.1920	1,657.16	696.36-
					18.64 C 715.00- I
7,359.0000	GDF SUEZ EUR1	271,153.35	27.5267	202,569.44	68,583.91- 1,883.97 C 70,467.88- I
1,005.0000	ALSTOM EUR7 (POST CONSOLIDATION	63,717.72	36.4536	36,635.89	27,081.83-
					412.07 C 27,493.90- I
573.0000	EUTELSAT COMMUNICATIONS PROMESSES EUR1	20,333.35	34.7421	19,907.28	426.07-
					224.10 C 650.17- I



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1,177.0000	EDF EUR0.5	65,033.78	31.4904	37,064.26	27,969.52- 416.90 C 28,386.42- I
194.0000	ARKEMA EUR10	19,948.18	97.3191	18,879.92	1,068.26- 847.36- C 220.90- I
1,407.0000	SES SA FIDUCIARY DR EACH REP 1 'A' SHS	35,779.12	37.9254	53,361.12	17,582.00 600.21 C 16,981.79 I
1,749.0000	SOLOCAL GROUP	10,246.44	0.9857	1,724.14	8,522.30- 19.39 C 8,541.69- I
396.0000	GEMALTO EUR 1	24,750.31	103.8911	41,140.88	16,390.57 3,688.46 C 12,702.11 I
1,396.0000	SAFRAN SA EUR0.20	54,700.42	65.4659	91,390.41	36,689.99 130.91 C 36,559.08 I
4,338.0000	NATIXIS EUR1.6 (POST SUBDU)	22,057.60	6.4103	27,808.15	5,750.55 283.32 C 5,467.23 I
824.0000	SCOR SE EUR7.876972 (POST CONSOLIDATION)	21,137.94	34.3930	28,339.87	7,201.93 318.76 C 6,883.17 I



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1,174.0000	REXEL PROMESSES EUR5	28,928.53	23.3850	27,454.09	1,474.44-
					188.49- C 1,285.95- I
2,653.0000	VINCI EUR2.50 (POST SUBDIVISIO	161,946.57	74.7555	198,326.58	36,380.01
					1,580.17 C 34,799.84 I
2,171.0000	AIR LIQUIDE(L') EUR5.5 (POST-SUBDIVISION)	219,936.11	134.9981	293,081.07	73,144.96
					2,466.43 C 70,678.53 I
3,068.0000	DANONE EUR0.25 (POST SUBDIVISION)	193,284.39	74.2626	227,837.95	34,553.56
					3,544.32 C 31,009.24 I
1,432.0000	LEGRAND SA EUR4	56,939.94	61.1804	87,610.43	30,670.49
					3,518.63 C 27,151.86 I
11,848.0000	TOTAL SA EUR2.5 POST SUBDIVISION	698,058.56	72.2637	856,180.76	158,122.20
					10,235.24 C 147,886.96 I
249.0000	ADP PROMESSES EUR3	20,801.73	131.7396	32,803.16	12,001.43
					368.95 C 11,632.48 I
1,025.0000	VALLOUREC (USIN A TUB DE LOR EUR2 (POST SUBDIVISION)	77,966.44	44.7780	45,897.51	32,068.93-
					1,637.45 C 33,706.38- I



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1,524.0000	BUREAU VERITAS EUR0.12	20,716.30	27.7526	42,295.07	21,578.77 475.73 C 21,103.04 I
2,370.0000	GET SA EUR0.40 (POST CONSOLIDATION)	24,524.33	13.5230	32,049.73	7,525.40 360.49 C 7,164.91 I
1,339.0000	SUEZ ENVIRONNEMENT CO EUR4	31,084.73	19.1407	25,629.42	5,455.31- 288.27 C 5,743.58- I
1,390.0000	EDENRED	34,315.44	30.3198	42,144.56	7,829.12 1,359.19- C 9,188.31 I
1,114.0000	BOUYGUES EUR1	56,882.95	41.6084	46,351.83	10,531.12- 521.36 C 11,052.48- I
3,349.0000	AIRBUS GROUP	119,082.27	67.0062	224,403.77	105,321.50 5,176.80 C 100,144.70 I
1,964.0000	VEOLIA ENVIRONMENT EUR5.0	69,082.65	19.0517	37,417.58	31,665.07- 420.86 C 32,085.93- I
1,361.0000	L'OREAL EUR0.2	157,577.98	172.3075	234,510.54	76,932.56 1,835.81 C 75,096.75 I



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317.0000	CHRISTIAN DIOR EUR2	35,245.61	198.9374	63,063.19	27,817.58 709.33 C 27,108.25 I
1,544.0000	LVMH MOET HENNESSY EUR0.30	206,688.42	192.7763	297,646.64	90,958.22 3,251.04 C 87,707.18 I
502.0000	THALES EUR3	20,217.49	60.4822	30,362.07	10,144.58 341.51 C 9,803.07 I
728.0000	CAP GEMINI EUR8	36,645.54	71.3327	51,930.22	15,284.68 584.11 C 14,700.57 I
275.0000	CASINO GUICH-PERR EUR1.53	23,603.25	132.5747	36,458.07	12,854.82 410.08 C 12,444.74 I
715.0000	CIE GENERALE DE GEOPHYSIQUE VERITAS	21,590.82	14.1570	10,122.26	11,468.56- 113.85 C 11,582.41- I
995.0000	PUBLICIS GROUPE SA EUR.4	59,430.01	84.8051	84,381.13	24,951.12 82.87 C 24,868.25 I
994.0000	LAFARGE SA EUR4.00	71,367.38	86.8041	86,283.29	14,915.91 970.51 C 13,945.40 I



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1,327.0000	LAGARDERE S.C.A. EUR6.1(REG)	44,658.17	32.5652	43,214.07	1,444.10- 1,347.11 C 2,791.21- I
181.0000	ICADE NPV (POST MERGER)	19,962.67	107.2044	19,404.00	558.67- 218.25 C 776.92- I
46.0000	BOLLORE EUR16	29,805.31	648.9771	29,852.95	47.64 61.05- C 108.69 I
1,017.0000	MICHELIN CIE GLE DES ETABL ORD EUR2 REGD	85,467.74	119.4720	121,503.05	36,035.31 569.87 C 35,465.44 I
1,237.0000	PERNOD-RICARD EUR1.55	115,757.47	120.0744	148,532.10	32,774.63 972.12 C 31,802.51 I
922.0000	RENAULT REGIE NATIONALE DES USINES EUR3.81	44,331.75	90.4049	83,353.39	39,021.64 937.55 C 38,084.09 I
209.0000	COINTREAU REMY	20,128.29	91.9931	19,226.58	901.71- 1,723.74 C 2,625.45- I
2,876.0000	SCHNEIDER ELECTRIC SE	168,314.27	94.1290	270,715.18	102,400.91 7,536.08 C 94,864.83 I



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6,314.0000	VIVENDI SA EUR5.5	166,926.62	24.4667	154,482.81	12,443.81- 1,737.60 C 14,181.41- I
517.0000	TECHNIP SA EUR	43,750.91	109.3813	56,550.18	12,799.27 636.07 C 12,163.20 I
350.0000	VALEO EUR3	37,205.43	134.2999	47,004.97	9,799.54 274.66- C 10,074.20 I
9,220.0000	ORANGE SA	222,470.44	15.7794	145,486.56	76,983.88- 1,636.41 C 78,620.29- I
54.0000	HERMES INTL FRF10 POST SPLIT	7,423.61	368.9859	19,925.24	12,501.63 224.12 C 12,277.51 I
247.0000	BIC EUR3.82	31,087.03	136.8054	33,790.95	2,703.92 231.99- C 2,935.91 I
342.0000	DASSAULT SYSTEMES SA EUR1	20,640.82	128.6453	43,996.70	23,355.88 494.86 C 22,861.02 I
378.0000	KERING EUR4.00	51,402.13	219.2693	82,883.82	31,481.69 932.26 C 30,549.43 I
856.0000	CNP ASSURANCES EUR1	20,286.42	20.7563	17,767.40	2,519.02- 199.84 C 2,718.86- I



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244.0000	NEOPOST FRF4	19,739.58	74.8925	18,273.77	1,465.81- 205.54 C 1,671.35- I
3,261.0000	CARREFOUR EUR2.5	152,513.29	36.8849	120,281.66	32,231.63- 929.15 C 33,160.78- I
745.0000	ATOS EUR1	51,206.59	83.2990	62,057.82	10,851.23 770.48 C 10,080.75 I
6,992.0000	SANOFI	554,558.72	106.2186	742,680.85	188,122.13 4,173.23 C 183,948.90 I
729.0000	ACCOR SAR	27,338.63	52.0140	37,918.21	10,579.58 426.50 C 10,153.08 I
6,891.0000	STMICROELECTRONICS EUR1.04 (SICOVAM)	54,202.77	8.9706	61,816.89	7,614.12 1,699.20 C 5,914.92 I
4,452.0000	SOCIETE GENERALE EUR1.25	274,474.31	52.3768	233,181.66	41,292.65- 1,538.62 C 42,831.27- I
19,915.0000	ALCATEL LUCENT EUR2 SER'A'	75,294.19	3.5707	71,111.35	4,182.84- 181.20 C 4,364.04- I



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1,099.0000	SOCIETE TELEVISION FRANCAISE 1	20,928.52	16.3818	18,003.69	2,924.83- 202.51 C 3,127.34- I
359.0000	EURAZEONCE NPV	19,422.15	83.1758	29,860.13	10,437.98 1,485.59 C 8,952.39 I
468.0000	SODEXO EUR4	28,555.92	107.5467	50,331.87	21,775.95 566.13 C 21,209.82 I
564.0000	UNIBAIL-RODAMCO SE EUR5	105,534.15	290.8759	164,054.02	58,519.87 1,038.71 C 57,481.16 I
9,607.0000	AXA EUR2.29	219,884.90	23.8985	229,593.02	9,708.12 2,045.44 C 7,662.68 I
2,806.0000	PEUGEOT SA EUR1	47,235.73	14.7799	41,472.61	5,763.12- 350.88 C 6,114.00- I
724.0000	JC DECAUX SA NPV	20,563.28	37.3093	27,011.96	6,448.68 303.83 C 6,144.85 I
999.0000	ESSILOR INTERNATIONAL EURO.18	64,575.39	106.0406	105,934.63	41,359.24 1,191.54 C 40,167.70 I
4,613.0000	CREDIT AGRICOLE SA EUR3	82,535.70	14.1022	65,053.66	17,482.04- 731.72 C 18,213.76- I



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1,375.0000	ZODIAC AEROSPACE NPV	25,719.85	33.8453	46,537.41	20,817.56 4,172.27 C 16,645.29 I
5,639.0000	BNP PARIBAS EUR2	435,829.70	67.8345	382,518.96	53,310.74- 3,398.85 C 56,709.59- I
2,607.0000	COMPAGNIE DE SAINT-GOBAIN EUR4	134,508.93	56.4158	147,076.06	12,567.13 731.04 C 11,836.09 I
514.0000	KLEPIERRE EUR1.4	20,338.77	50.9529	26,189.80	5,851.03 294.58 C 5,556.45 I
197.0000	GECINA EUR7.50	20,883.18	145.8144	28,725.45	7,842.27 775.23 C 7,067.04 I
179.0000	FONCIERE DES REGIO EUR2	19,659.66	108.4092	19,405.26	254.40- 218.26 C 472.66- I
173.0000	ILIAD NPV	31,243.44	302.2398	52,287.50	21,044.06 2,488.08 C 18,555.98 I
354.0000	NATIONAL BANK OF GREECE EUR0.30 (POST SPLIT)	47,928.08	3.6556	1,294.09	46,633.99- 36.98 C 46,670.97- I



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2,534.0000	ALPHA BANK (REGD)EUR0.3	13,890.98	0.9310	2,359.21	11,531.77- 76.94 C 11,608.71- I
5,320.0000	BANK OF CYPRUS PUBLIC CO LTD EUR1	19,470.56	0.2834	1,507.76	17,962.80- 65.08 C 18,027.88- I
1,184.0000	HELLENIC TELECOM ORGANIZATION SA EUR2.83	9,384.52	14.7868	17,507.59	8,123.07 354.22- C 8,477.29 I
1,278.0000	OPAP SA EUR0.3 (CR)	20,107.67	17.7989	22,747.06	2,639.39 741.82 C 1,897.57 I
1,336.0000	PUBLIC POWER CORP EUR4.60 (CR)	18,774.52	15.4577	20,651.49	1,876.97 926.88- C 2,803.85 I
3,803.0000	CNH INDUSTRIAL NV	45,734.12	10.2686	39,051.58	6,682.54- 939.81 C 7,622.35- I
2,166.0000	BANCO POPOLARE SC	43,373.34	16.4708	35,675.91	7,697.43- 68.05 C 7,765.48- I
28,352.0000	BCA MPS NPV (POST REVERSE SPLIT)	84,875.40	1.9373	54,927.67	29,947.73- 393.33 C 30,341.06- I



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4.0000	BANCA MONTE DEI PASCHI DI SIEN RTS EXP 27-JUN-2014	466.47	28.5741	114.30	352.17- 1.29 C 353.46- I
2,012.0000	FINMECCANICA SPA EUR 4.40	27,251.07	9.5087	19,131.60	8,119.47- 215.19 C 8,334.66- I
6,467.0000	T. E. R. N. A. ORD EURO.22	28,094.74	5.2739	34,106.73	6,011.99 383.63 C 5,628.36 I
726.0000	EXOR SPA EUR1	29,414.19	41.0608	29,810.15	395.96 204.66- C 600.62 I
1,022.0000	PRYSMIAN CAB & SYS NPV	20,694.15	22.5909	23,087.98	2,393.83 259.70 C 2,134.13 I
7,738.0000	ENEL GREEN POWER SPA EURO.20	20,201.75	2.8314	21,909.38	1,707.63 983.34- C 2,690.97 I
26,942.0000	UNICREDIT SPA	264,618.01	8.3723	225,567.91	39,050.10- 3,815.33 C 42,865.43- I
7,068.0000	ASSICURAZIONI GENERALI EUR1	171,132.39	21.9200	154,931.21	16,201.18- 1,268.97 C 17,470.15- I



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3,190.0000	BANCA POPOLARE DI MILANO EUR	6,743.83	0.8967	2,860.77	3,883.06- 32.18 C 3,915.24- I
70,461.0000	INTESA SANPAOLO EURO.52	221,285.70	3.0888	217,640.11	3,645.59- 1,511.85 C 5,157.44- I
6,743.0000	INTESA SANPAOLO EURO.52 NON CNV	20,503.37	2.6588	17,928.90	2,574.47- 201.67 C 2,776.14- I
2,356.0000	MEDIOBANCA SPA EURO.5	25,687.78	9.9674	23,483.22	2,204.56- 264.14 C 2,468.70- I
1,641.0000	PIRELLI & C SPA	18,106.47	16.0464	26,332.20	8,225.73 1,437.62 C 6,788.11 I
1,719.0000	SAIPEM EUR1	68,776.79	26.9722	46,365.31	22,411.48- 521.52 C 22,933.00- I
747.0000	LUXOTTICA GROUP EURO.06	20,214.90	57.8739	43,231.86	23,016.96 486.27 C 22,530.69 I
3,726.0000	MEDIASET EURO.52	32,373.91	4.8741	18,161.17	14,212.74- 204.27 C 14,417.01- I



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10,690.0000	A2A SPA EUR0.52	20,255.88	1.1535	12,331.02	7,924.86- 138.70 C 8,063.56- I
3,803.0000	FIAT SPA EUR3.58	50,349.92	9.8715	37,541.59	12,808.33- 422.26 C 13,230.59- I
1,074.0000	BENI STABILI SPA EUR0.1	780.11	0.9173	985.21	205.10 114.09 C 91.01 I
39,485.0000	ENEL EUR1	215,302.13	5.8243	229,975.02	14,672.89 2,015.49 C 12,657.40 I
13,742.0000	ENI EUR	327,581.05	27.3556	375,920.89	48,339.84 5,069.30 C 43,270.54 I
12,833.0000	SNAM SPA	66,394.55	6.0242	77,309.33	10,914.78 243.91 C 10,670.87 I
2,348.0000	TENARIS S AUDS1	52,059.78	23.5493	55,293.94	3,234.16 621.94 C 2,612.22 I
2,860.0000	UBI BANCA SCPA EUR2.5	38,891.56	8.6530	24,747.66	14,143.90- 278.36 C 14,422.26- I
49,904.0000	TELECOM ITALIA EUR0.00	72,998.62	1.2664	63,201.61	9,797.01- 710.89 C 10,507.90- I



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29,965.0000	TELECOM ITALIA DI RISP EUR0.00	34,152.62	0.9878	29,600.68	4,551.94- 332.94 C 4,884.88- I
2,674.0000	ATLANTIA SPA	60,462.36	28.5057	76,224.25	15,761.89 199.00 C 15,562.89 I
793.0000	OCI NV EUR1.00	31,280.87	39.0207	30,943.47	337.40- 212.45- C 124.95- I
417.0000	ALTICE SA	28,650.09	69.6623	29,049.20	399.11 201.55 C 197.56 I
5,471.0000	AHOLD(KON)NV EUR0.01	79,474.11	18.7710	102,696.40	23,222.29 1,155.12 C 22,067.17 I
453.0000	HEINEKEN HOLDING EUR1.6	20,219.72	65.7397	29,780.11	9,560.39 334.96 C 9,225.43 I
766.0000	KONINKLIJKE DSM NV EUR1.5	35,067.20	72.8250	55,784.02	20,716.82 627.46 C 20,089.36 I
4,269.0000	ARCELORMITTAL NPV (POST-REORGANISATION)	185,077.36	14.8278	63,300.28	121,777.08- 711.99 C 122,489.07- I



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332.0000	FUGRO NV CVZ EURO0.05 (POST-SUBDIVISION)	22,640.88	57.2510	19,007.33	3,633.55- 213.78 C 3,847.33- I
631.0000	BOSKALIS WESTMINSTER GROEP NV NV CVA EUR0.80(POST SUBDIVIS)	30,338.66	57.3468	36,185.87	5,847.21 248.43- C 6,095.64 I
9,071.0000	UNILEVER NV CVA EUR0.16	292,284.91	43.7511	396,867.04	104,582.13 3,523.16 C 101,058.97 I
1,005.0000	SBM OFFSHORE NV EURO.25 (POST SUBDIVISION)	20,594.94	16.1354	16,216.12	4,378.82- 182.40 C 4,561.22- I
1,874.0000	TNT EXPRESS NV	23,515.99	9.0500	16,959.85	6,556.14- 505.40- C 6,050.74- I
1,379.0000	DELTA LLOYD NV	29,271.33	25.3840	35,004.59	5,733.26 240.33- C 5,973.59 I
213.0000	APERAM	9,777.67	33.7495	7,188.65	2,589.02- 80.86 C 2,669.88- I
699.0000	ZIGGO BV	30,262.73	46.2361	32,319.10	2,056.37 221.89- C 2,278.26 I



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1,801.0000	ASML HOLDING NV EUR0.09 (POST SPLIT)	68,298.09	93.1158	167,701.72	99,403.63
					1,877.62 C 97,526.01 I
3,599.0000	REED ELSEVIER NV EUR0.07	44,110.09	22.9332	82,536.81	38,426.72
					928.36 C 37,498.36 I
719.0000	CORIO NV EUR10	47,367.62	51.0692	36,718.82	10,648.80-
					135.07 C 10,783.87- I
506.0000	RANDSTAD HLDGS EUR0.1	24,857.29	54.2046	27,427.55	2,570.26
					308.50 C 2,261.76 I
1,153.0000	AKZO NOBEL NV EUR2	67,073.05	74.9609	86,429.99	19,356.94
					972.15 C 18,384.79 I
2,101.0000	POSTNL NV	55,857.57	4.7235	9,924.22	45,933.35-
					112.12 C 46,045.47- I
1,384.0000	WOLTERS KLUWERS COM EUR0.12	30,489.18	29.6010	40,967.82	10,478.64
					460.81 C 10,017.83 I
378.0000	KONINKLIJKE VOPAK NV EUR0.5	19,936.72	48.8786	18,476.13	1,460.59-
					1,287.39 C 2,747.98- I



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10,489.0000	AEGON NV EUR0.12	74,646.46	8.7269	91,537.11	16,890.65 1,533.24 C 15,357.41 I
17,295.0000	KONINKLIJKE KPN NV EUR0.04	107,516.44	3.6433	63,011.02	44,505.42- 391.66 C 44,897.08- I
5,672.0000	KONINKLIJKE PHILIPS NV	187,959.19	31.7300	179,972.85	7,986.34- 1,523.00 C 9,509.34- I
21,322.0000	ING GROEP N.V. CVA EUR0.24	218,656.86	14.0474	299,520.35	80,863.49 4,007.20 C 76,856.29 I
1,218.0000	HEINEKEN NV EUR1.60	62,647.05	71.7845	87,433.56	24,786.51 983.44 C 23,803.07 I
1,157.0000	GALP ENERGIA SGPS EUR1	20,575.66	18.3192	21,195.35	619.69 238.41 C 381.28 I
997.0000	JERONIMO MARTINS EUR1 (POST SUBDIVISION)	10,177.69	16.4503	16,400.99	6,223.30 184.46 C 6,038.84 I
2,539.0000	EDP RENOVAVEIS SA	20,117.51	7.4454	18,903.96	1,213.55- 212.63 C 1,426.18- I



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5,152.0000	BANCO ESPIRITO SANTO SA EUR(REGD)	13,545.89	0.8242	4,246.42	9,299.47- 47.57 C 9,347.04- I
8,694.0000	EDP ENERGIAS PORTUGAL EUR1(REGD)	34,843.37	5.0165	43,614.03	8,770.66 490.57 C 8,280.09 I
17,997.0000	BANCO COMMERCIAL PORTUGUESE EUR1 REG D	11,798.80	0.2613	4,703.89	7,094.91- 52.90 C 7,147.81- I
2,898.0000	PORTUGAL TELECOM SGPS SA EUR0.03 REG1	32,492.21	3.6638	10,617.83	21,874.38- 119.43 C 21,993.81- I
2,917.0000	CIE FINANCIERE RICHEMONT SA	132,854.65	104.9278	306,074.48	173,219.83 37,589.60 C 135,630.23 I
273.0000	SWISS PRIME SITE AG	19,979.10	82.8822	22,626.86	2,647.76 1,474.11 C 1,173.65 I
193.0000	GEBERIT CHF0.10 (REGD) (POST SUBDIVISION)	35,323.09	351.0374	67,750.23	32,427.14 10,358.15 C 22,068.99 I



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1,647.0000	GAM HOLDING LTD	20,525.98	19.0572	31,387.35	10,861.37 4,798.72 C 6,062.65 I
507.0000	ACTELION CHF0.5 (REGD)(POST SUBD)	23,379.64	126.5223	64,146.82	40,767.18 9,807.24 C 30,959.94 I
230.0000	SCHINDLER HLDG AG PTG CERT CHF0.10 (POST-SUBD)	20,772.67	152.0072	34,961.66	14,188.99 5,345.19 C 8,843.80 I
88.0000	PARTNERS GRP HLDG AG CHF0.01 (REGD)	22,346.93	273.3423	24,054.13	1,707.20 1,574.20 C 133.00 I
201.0000	KUEHNE & NAGEL AG CHF1(REGD) (POST-SUBD)	20,689.23	133.0626	26,745.60	6,056.37 4,089.06 C 1,967.31 I
20,241.0000	UBS AG CHF0.1 (POST SUBDIVISION)	350,925.34	18.3468	371,358.90	20,433.56 51,036.33 C 30,602.77- I
1,236.0000	LOGITECH INTL SA CHF0.25(REGD) (POST SUBDIVISION)	20,601.44	13.0243	16,098.11	4,503.33- 2,461.20 C 6,964.53- I



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481.0000	ARYZTA AG CHF0.02 (REGD)	20,617.31	94.7225	45,561.57	24,944.26 7,037.27 C 17,906.99 I
1,027.0000	JULIUS BAER GRUPPE AG	38,112.77	41.2268	42,340.01	4,227.24 6,473.24 C 2,246.00- I
1,515.0000	TRANSOCEAN LTD	105,799.85	44.9481	68,096.41	37,703.44- 5,511.79 C 43,215.23- I
2,811.0000	SWISS RE LTD	148,612.83	88.9715	250,099.12	101,486.29 23,019.06 C 78,467.23 I
545.0000	SYNGENTA AG CHF0.1	162,674.15	372.4627	202,992.22	40,318.07 26,211.30 C 14,106.77 I
10.0000	SIKA FINANZ AG CHF0.6 (BR)	21,131.92	4,088.8588	40,888.59	19,756.67 3,309.57 C 16,447.10 I
28.0000	SGS SA CHF1(REGD)	39,605.21	2,396.2562	67,095.17	27,489.96 10,258.00 C 17,231.96 I
116.0000	SWISSCOM AG CHF1.00	42,793.52	581.3035	67,431.21	24,637.69 10,309.36 C 14,328.33 I
1.0000	LINDT & SPRUENGLI AG CHF100 REGD	27,285.93	61,772.6657	61,772.67	34,486.74 9,444.26 C 25,042.48 I



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39.0000	GIVAUDAN AG CHF10	34,626.85	1,667.7943	65,043.98	30,417.13 9,944.40 C 20,472.73 I
842.0000	ZURICH INSURANCE GROUP AG CHF0.1	211,187.70	301.4208	253,796.35	42,608.65 34,224.05 C 8,384.60 I
12,809.0000	NOVARTIS AG CHF0.50 (REGD)	730,803.62	90.5502	1,159,858.70	429,055.08 133,797.31 C 295,257.77 I
12,133.0000	ABB LTD CHF1.03 (REGD)	269,156.00	23.0266	279,381.89	10,225.89 38,863.05 C 28,637.16 I
3,912.0000	ROCHE HLDG AG GENUSSSCHEINE NPV	687,661.69	298.2634	1,166,806.49	479,144.80 153,497.31 C 325,647.49 I
783.0000	ADECCO SA CHF1 (REGD)	44,280.86	82.3184	64,455.35	20,174.49 9,395.81 C 10,778.68 I
1,219.0000	HOLCIM CHF2 (REGD)	92,852.73	87.9003	107,150.48	14,297.75 16,381.94 C 2,084.19 I
18,491.0000	NESTLE SA	1,001,307.85	77.4695	1,432,489.51	431,181.66 187,670.23 C 243,511.43 I



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248.0000	BALOISE HOLDING AG CHF0.1	22,445.75	117.8394	29,224.18	6,778.43
					4,468.01 C 2,310.42 I
228.0000	SONOVA HLDG CHF0.05	28,545.57	152.5710	34,786.20	6,240.63
					5,318.37 C 922.26 I
142.0000	STRAUMANN HOLDING AG	37,497.53	231.6193	32,889.94	4,607.59-
					197.23 C 4,804.82- I
8,341.0000	CREDIT SUISSE GROUP AG CHF0.04 REGD	359,944.61	28.5972	238,529.27	121,415.34-
					31,983.04 C 153,398.38- I
153.0000	SWATCH GROUP CHF2.25 (BR)	49,424.33	603.8565	92,390.05	42,965.72
					14,125.26 C 28,840.46 I
264.0000	SWATCH GROUP CHF0.45 (REGD)	29,592.20	111.0735	29,323.41	268.79-
					19.85- C 248.94- I
248.0000	LONZA GROUP AG CHF1(REGISTERED)	20,371.84	108.8182	26,986.92	6,615.08
					4,125.96 C 2,489.12 I
155.0000	SWISS LIFE HOLDING AG CHF5.1	20,381.60	237.1447	36,757.44	16,375.84
					5,623.20 C 10,752.64 I



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55.0000	BQE CANT VAUDOISE CHF20 (REGISTERED)	29,831.67	545.2187	29,987.03	155.36 1,154.22 C 998.86- I
3,112.0000	ROYAL MAIL PLC	30,016.04	8.5321	26,552.06	3,463.98- 420.06 C 3,884.04- I
1,305.0000	WOLSELEY ORD GBP0.108030303(POST CON	34,584.64	54.7664	71,470.28	36,885.64 7,590.75 C 29,294.89 I
1,348.0000	IMI ORD GBP0.2857	21,021.35	25.4254	34,273.53	13,252.18 3,285.33 C 9,966.85 I
5,123.0000	MELROSE INDUSTRIES PLC NEW ORD GBP0.0011818181	20,943.91	4.4490	22,792.39	1,848.48 1,872.21 C 23.73- I
147,852.0000	VODAFONE GROUP PLC	662,937.28	3.3342	492,969.25	169,968.03- 49,342.64 C 219,310.67- I
3,393.0000	RSA INSURANCE GROUP PLC	33,586.78	8.1183	27,545.62	6,041.16- 2,925.57 C 8,966.73- I
841.0000	AGGREKO ORD GBP0.048329113924	23,091.40	28.2125	23,726.73	635.33 1,583.30 C 947.97- I



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3,584.0000	REXAM NEW ORD GBP0.8035714	20,429.23	9.1476	32,785.35	12,356.12 3,482.08 C 8,874.04 I
1,321.0000	KAZAKHMYS ORD GBP0.20	26,910.58	5.1996	6,868.74	20,041.84- 718.90 C 20,760.74- I
957.0000	PETROFAC LTD ORD SHS 0.02 USD	20,139.28	20.5694	19,685.01	454.27- 1,313.60 C 1,767.87- I
1,249.0000	LONDON STOCK EXCHANGE GROUP ORD GBP0	19,634.52	34.3166	42,861.55	23,227.03 3,988.22 C 19,238.81 I
437.0000	RANDGOLD RESOURCES ORD USD0.05	34,880.49	83.3209	36,411.27	1,530.78 3,867.17 C 2,336.39- I
12,404.0000	G4S PLC ORD GBP0.25	51,306.55	4.3635	54,125.32	2,818.77 4,181.89 C 1,363.12- I
5,977.0000	SAINSBURY (J) ORD GBP0.2857142 (POST REC	30,255.56	5.3945	32,243.39	1,987.83 3,424.51 C 1,436.68- I
1,785.0000	ADMIRAL GROUP ORD GBP0.001	40,651.18	26.4855	47,276.75	6,625.57 4,254.64 C 2,370.93 I



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21,149.0000	ROYAL DUTCH SHELL PLC A SHS	642,002.86	41.3527	874,568.73	232,565.87
					86,703.06 C 145,862.81 I
14,750.0000	ROYAL DUTCH SHELL PLC B SHS	425,726.15	43.4729	641,225.81	215,499.66
					64,621.91 C 150,877.75 I
30,712.0000	CENTRICA ORD GBP0.061728395	146,804.31	5.3449	164,155.36	17,351.05
					15,830.56 C 1,520.49 I
5,131.0000	COBHAM ORD GBP0.025	20,935.09	5.3398	27,398.82	6,463.73
					2,909.97 C 3,553.76 I
1,816.0000	BUNZL ORD GBP0.3214857	20,651.71	27.7337	50,364.52	29,712.81
					5,349.13 C 24,363.68 I
21,872.0000	NATIONAL GRID PLC NEW ORD GBP0.11395	220,386.25	14.3627	314,141.85	93,755.60
					29,408.71 C 64,346.89 I
1,759.0000	INMARSAT ORD EUR0.000667	20,544.15	12.7811	22,482.01	1,937.86
					2,387.76 C 449.90- I
1,103.0000	SEVERN TRENT ORD GBP0.9789	20,476.29	33.0343	36,436.84	15,960.55
					3,869.89 C 12,090.66 I



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899.0000	WHITBREAD ORD GBP0.76797385	20,681.88	75.3872	67,773.17	47,091.29
					7,198.07 C 39,893.22 I
2,447.0000	SPORTS DIRECT INTERNATIONAL PLC	29,881.31	12.0800	29,559.99	321.32-
					467.64 C 788.96- I
4,940.0000	THOMAS COOK GROUP PLC ORD EUR0.01	17,837.19	2.2826	11,276.29	6,560.90-
					1,197.64 C 7,758.54- I
1,665.0000	HARGREAVES LANSDOWN ORD GBP0.004 (WI)	24,657.67	21.1679	35,244.63	10,586.96
					3,720.59 C 6,866.37 I
1,938.0000	SMITHS GROUP PLC ORD GBP0.375	34,129.84	22.1767	42,978.55	8,848.71
					4,564.67 C 4,284.04 I
7,778.0000	ANGLO AMERICAN USD0.54(POST CONSOLIDATION)	326,724.07	24.4508	190,178.75	136,545.32-
					19,365.68 C 155,911.00- I
4,824.0000	3I GROUP PLC ORD GBP0.738636	21,750.77	6.8718	33,149.99	11,399.22
					3,520.80 C 7,878.42 I



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4,350.0000	TUI TRAVEL PLC ORD GBP0	20,542.85	6.8052	29,602.63	9,059.78 3,144.03 C 5,915.75 I
7,148.0000	UNILEVER PLC ORD GBP0.031111	224,999.35	45.3281	324,005.43	99,006.08 32,276.59 C 66,729.49 I
88.0000	SCHNEIDER ELECTRIC SA	20,502.60	94.1290	8,283.36	12,219.24- 645.91 C 12,865.15- I
11,120.0000	STANDARD LIFE ORD GBP0.10	34,689.37	6.3965	71,129.62	36,440.25 7,554.56 C 28,885.69 I
2,447.0000	INVESTEC ORD GBP0.0002	20,287.80	9.2160	22,551.78	2,263.98 2,395.18 C 131.20- I
4,869.0000	HOME RETAIL GROUP ORD GBP0	20,472.20	3.0230	14,719.06	5,753.14- 1,563.29 C 7,316.43- I
5,103.0000	EXPERIAN PLC ORD USD0.10	50,874.22	16.8933	86,206.60	35,332.38 9,155.84 C 26,176.54 I
6,030.0000	REED ELSEVIER ORD GBP0.14	48,740.86	16.0725	96,917.72	48,176.86 10,293.45 C 37,883.41 I



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3,382.0000	SHIRE PLC ORD GBP0.05	90,983.07	78.1401	264,269.97	173,286.90 22,307.16 C 150,979.74 I
1,572.0000	FRESNILLO PLC	20,969.12	14.9098	23,438.35	2,469.23 2,489.34 C 20.11- I
3,003.0000	CAPITA PLC	35,764.50	19.5777	58,792.08	23,027.58 6,244.20 C 16,783.38 I
3,707.0000	RECKITT BENCKISER GROUP PLC ORD GBP0.10	216,165.20	87.2023	323,259.11	107,093.91 31,466.55 C 75,627.36 I
3,389.0000	UNITED UTILITIES GROUP PLC ORD GBP0.05	29,529.34	15.0808	51,109.09	21,579.75 5,428.19 C 16,151.56 I
59,086.0000	GLENCORE PLC	328,725.42	5.5664	328,897.29	171.87 24,718.04 C 24,546.17- I
4,025.0000	SEGRO PLC	19,669.96	5.9024	23,757.17	4,087.21 2,523.20 C 1,564.01 I
2,617.0000	CAPITAL & COUNTIES PROPERTIES PLC GBP0.25	4,040.03	5.5689	14,574.03	10,534.00 1,798.90 C 8,735.10 I



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6,463.0000	FRIENDS LIFE GROUP LIMITED	31,500.32	5.3911	34,843.05	3,342.73 1,723.37 C 1,619.36 I
10,800.0000	ROLLS-ROYCE HLDGS PLC ORD GBP0.20	116,271.28	18.2782	197,405.60	81,134.32 18,562.84 C 62,571.48 I
12,555.0000	ROYAL BANK OF SCOT ORD GBP1 (POST CONS)	79,202.31	5.6151	70,498.18	8,704.13- 7,475.21 C 16,179.34- I
1,019.0000	JOHNSON MATTHEY ORD GBP1.04761 (POST CONSOLIDATION)	29,312.43	53.0053	54,012.45	24,700.02 5,736.56 C 18,963.46 I
2,698.0000	CAIRN ENERGY PLC	45,638.79	3.4197	9,226.35	36,412.44- 979.92 C 37,392.36- I
22,965.0000	OLD MUTUAL PLC ORD GBP0.114285714(POST CON	49,850.72	3.3803	77,630.28	27,779.56 8,244.96 C 19,534.60 I
6,208.0000	SAGE GROUP GBP0.01051948	24,218.14	6.5675	40,771.25	16,553.11 4,330.25 C 12,222.86 I



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6,234.0000	WPP PLC ORD GBP0.10	65,866.78	21.7834	135,798.27	69,931.49 14,422.88 C 55,508.61 I
8,510.0000	MAN GROUP PLC ORD USD0.03428571	31,961.56	1.7987	15,307.47	16,654.09- 1,625.78 C 18,279.87- I
1,196.0000	INTERCONTINENTAL HOTELS GROUP PLC	20,587.94	41.3954	49,508.98	28,921.04 5,258.26 C 23,662.78 I
8,397.0000	DIRECT LINE INSURANCE GROUP PL	30,468.89	4.6131	38,736.84	8,267.95 2,191.87 C 6,076.08 I
1,734.0000	COCA COLA HBC ORD CHF0.10	41,822.89	22.9461	39,788.69	2,034.20- 14,687.24 C 16,721.44- I
5,003.0000	ABERDEEN ASSET MANAGEMENT PLC	20,424.76	7.7610	38,828.33	18,403.57 3,612.93 C 14,790.64 I
1,675.0000	AMEC ORD 50P	20,927.33	20.7746	34,797.58	13,870.25 3,695.77 C 10,174.48 I
1,961.0000	ANTOFAGASTA ORD GBP0.05	32,395.38	13.0461	25,583.51	6,811.87- 2,717.17 C 9,529.04- I



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11,927.0000	BHP BILLITON PLC USD0.50	418,087.39	32.3076	385,332.94	32,754.45- 39,619.47 C 72,373.92- I
8,485.0000	ARM HOLDINGS ORD GBP0.0005	66,181.27	15.0637	127,816.16	61,634.89 9,273.35 C 52,361.54 I
4,478.0000	BALFOUR BEATTY ORD GBP0.50	20,349.08	3.9925	17,878.41	2,470.67- 1,898.83 C 4,369.50- I
4,296.0000	BRITISH LAND ORD GBP0.25	32,163.90	12.0116	51,602.25	19,438.35 5,480.58 C 13,957.77 I
5,666.0000	BRITISH SKY BRDCSTG ORD 50P	53,330.00	15.4570	87,579.61	34,249.61 9,301.66 C 24,947.95 I
4,400.0000	TULLOW OIL PLC ORD GBP0.10	86,681.19	14.5935	64,211.71	22,469.48- 6,819.80 C 29,289.28- I
17,968.0000	AVIVA PLC GBP0.25	111,303.76	8.7287	156,838.80	45,535.04 14,657.90 C 30,877.14 I
658.0000	CRODA INTL ORD 10P	23,015.27	37.6337	24,763.04	1,747.77 2,373.69 C 625.92- I



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14,104.0000	DIAGEO ORD 28 101/108P	267,747.74	31.9058	449,999.42	182,251.68 43,974.69 C 138,276.99 I
937.0000	SCHRODERS (NEW) ORD GBP1	20,605.71	42.8488	40,149.36	19,543.65 4,264.20 C 15,279.45 I
17,605.0000	BAE SYSTEMS ORD GBP0.025	101,124.96	7.4019	130,311.17	29,186.21 13,840.10 C 15,346.11 I
11,183.0000	BRITISH AMERICAN TOBACCO ORD GBP0.25	417,704.20	59.4685	665,037.16	247,332.96 65,338.73 C 181,994.23 I
3,535.0000	FIRSTGROUP ORD5P	14,901.58	2.1646	7,652.11	7,249.47- 812.72 C 8,062.19- I
3,368.0000	HAMMERSON ORD 25P REITS	20,444.58	9.9171	33,400.89	12,956.31 3,547.44 C 9,408.87 I
13,397.0000	STANDARD CHARTERED ORD USD0.50	360,935.40	20.4156	273,507.91	87,427.49- 26,442.21 C 113,869.70- I
5,856.0000	IMPERIAL TOBACCO GROUP ORD 10P	186,122.96	44.9690	263,338.79	77,215.83 25,925.33 C 51,290.50 I



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5,355.0000	SABMILLER PLC	176,726.89	57.9297	310,213.64	133,486.75 30,030.93 C 103,455.82 I
9,224.0000	COMPASS GROUP ORD GBP0.10	75,336.92	17.3891	160,397.75	85,060.83 17,035.55 C 68,025.28 I
107,550.0000	HSBC HOLDINGS PLC	1,115,377.22	10.1377	1,090,309.70	25,067.52- 106,922.98 C 131,990.50- I
29,150.0000	LEGAL & GENERAL GROUP ORD 2.5P	39,755.78	3.8540	112,344.16	72,588.38 11,931.85 C 60,656.53 I
3,833.0000	MEGGITT ORD5P	22,799.63	8.6518	33,162.51	10,362.88 2,905.37 C 7,457.51 I
17,117.0000	MORRISON (W) SUPMKT ORD 10P	78,131.76	3.1358	53,676.60	24,455.16- 4,700.60 C 29,155.76- I
1,772.0000	ASSOCIATED BRITISH FOODS PLC	26,740.94	52.1333	92,380.25	65,639.31 9,811.52 C 55,827.79 I
4,032.0000	PEARSON ORD GBP0.25	64,685.63	19.7316	79,558.09	14,872.46 8,449.71 C 6,422.75 I
1,329.0000	PERSIMMON ORD 10P	29,999.89	21.7663	28,927.53	1,072.36- 457.63 C 1,529.99- I



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2,617.0000	INTU PROPERTIES PLC GBP0.50	20,530.93	5.3278	13,943.09	6,587.84- 1,480.86 C 8,068.70- I
14,046.0000	PRUDENTIAL PLC GBP0.05	139,803.09	22.9290	322,061.98	182,258.89 30,940.64 C 151,318.25 I
7,623.0000	RIO TINTO PLC	465,331.51	53.1506	405,167.70	60,163.81- 39,949.01 C 100,112.82- I
1,023.0000	TRAVIS PERKINS ORD GBP0.10	29,702.69	28.0073	28,651.51	1,051.18- 1,621.21 C 2,672.39- I
5,895.0000	SSE PLC	108,280.57	26.7933	157,946.80	49,666.23 14,653.44 C 35,012.79 I
2,198.0000	SERCO GROUP ORD 2P	20,385.14	6.2495	13,736.40	6,648.74- 1,458.92 C 8,107.66- I
105,735.0000	BP PLC ORD USD.25	991,798.65	8.8040	930,892.81	60,905.84- 94,876.45 C 155,782.29- I
326,075.0000	LLOYDS BANKING GROUP PLC GBP0.1	352,551.38	1.2695	413,972.96	61,421.58 32,204.41 C 29,217.17 I



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1,831.0000	TATE & LYLE ORD 25P	20,089.93	11.7039	21,429.89	1,339.96 2,071.74 C 731.78- I
18,954.0000	BG GROUP PLC ORD GBP0.10	344,447.54	21.1166	400,244.94	55,797.40 40,088.10 C 15,709.30 I
44,991.0000	TESCO ORD 5P	299,231.92	4.8593	218,628.98	80,602.94- 22,074.53 C 102,677.47- I
4,405.0000	SMITH & NEPHEW ORD USD0.20	44,135.19	17.7653	78,256.33	34,121.14 8,311.46 C 25,809.68 I
27,430.0000	GLAXOSMITHKLINE ORD GBP0.25	541,263.30	26.7420	733,534.54	192,271.24 75,167.76 C 117,103.48 I
1,019.0000	WEIR GROUP ORD 12.5P	28,648.76	44.7809	45,631.81	16,983.05 4,270.02 C 12,713.03 I
1,787.0000	BABCOCK INTL GROUP ORD GBP0.60	23,418.62	19.8684	35,504.93	12,086.31 2,432.63 C 9,653.68 I
7,210.0000	ASTRAZENECA ORD USD0.25	326,397.27	74.2160	535,097.64	208,700.37 56,831.71 C 151,868.66 I
7,196.0000	GKN ORD GBP0.01	19,812.66	6.2084	44,676.12	24,863.46 3,556.12 C 21,307.34 I



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43,667.0000	BT GROUP ORD GBP0.05	103,952.01	6.5812	287,381.81	183,429.80 26,560.13 C 156,869.67 I
337.0000	ASSEENONSCREEN HLDGS ORD GBP0.035	28,749.39	50.6115	17,056.10	11,693.29- 591.54 C 12,284.83- I
646.0000	LONMIN ORD USD1	11,216.03	4.0557	2,620.02	8,596.01- 278.27 C 8,874.28- I
831.0000	CARNIVAL PLC ORD USD1.66	34,696.54	37.7534	31,373.15	3,323.39- 3,332.09 C 6,655.48- I
7,856.0000	MARKS & SPENCER GROUP ORD GBP0.25	44,897.16	7.2702	57,115.33	12,218.17 6,066.11 C 6,152.06 I
92,589.0000	BARCLAYS ORD GBP0.25	470,300.44	3.6385	336,890.70	133,409.74- 30,529.43 C 163,939.17- I
1,582.0000	INTERTEK GROUP PLC ORD GBP0.01	53,999.85	47.0037	74,359.97	20,360.12 3,007.27 C 17,352.85 I
4,393.0000	WILLIAM HILL PLC	30,814.68	5.6083	24,637.30	6,177.38- 2,774.47 C 8,951.85- I



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2,749.0000	BURBERRY GROUP ORD GBP0.0005	40,583.00	25.3570	69,706.60	29,123.60 7,381.25 C 21,742.35 I
3,760.0000	LAND SECS GP ORD GBP0.10 REITS	39,175.18	17.7140	66,604.81	27,429.63 7,073.96 C 20,355.67 I
981.0000	NEXT GROUP ORD GBP0.10	32,909.37	110.7127	108,609.24	75,699.87 11,535.17 C 64,164.70 I
11,741.0000	KINGFISHER ORD GBP0.157142857	39,134.34	6.1383	72,070.50	32,936.16 7,654.47 C 25,281.69 I
679.0000	VEDANTA RESOURCES PLC	29,873.75	18.9622	12,875.36	16,998.39- 1,367.47 C 18,365.86- I
3,509.0000	ICAP ORD GBP0.10	20,362.17	6.4974	22,799.48	2,437.31 2,421.49 C 15.82 I
20,801.0000	ITV ORD GBP0.10	53,455.90	3.0469	63,379.66	9,923.76 4,394.52 C 5,529.24 I
1,329.0000	PERSIMMON C SHARE INCOME NPV	1,562.07	1.1968	1,590.67	28.60 C
4,061.0000	RYANAIR HLDGS ORD EUR0.00635	22,078.45	9.4608	38,420.42	16,341.97 432.16 C 15,909.81 I



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17,475.0000	BK OF IRELAND ORD STK EUR0.1	16,364.43	0.3381	5,909.70	10,454.73- 192.72 C 10,647.45- I
4,126.0000	CRH ORD EUR0.32 DUBLIN LIST	105,494.92	25.6578	105,864.38	369.46 646.72 C 277.26- I
697.0000	KERRY GROUP 'A' ORD EUR0.125 DUBLIN LISTING	22,217.57	75.0978	52,343.22	30,125.65 588.75 C 29,536.90 I
18,000.0000	FIH MOBILE LIMITED	19,712.25	0.6348	11,426.58	8,285.67- 24.86 C 8,310.53- I
2,000.0000	KERRY LOGISTICS NETWORK LTD	2,089.61	1.5792	3,158.57	1,068.96 0.94 C 1,068.02 I
750.0000	SUN HUNG KA-CW16 WTS EXP 22-APR-2016	261.49	1.3057	979.31	717.82 1.80 C 716.02 I
11,000.0000	LINK REAL ESTATE INVT TRUST UNITS	37,786.63	5.3804	59,184.42	21,397.79 282.74 C 21,115.05 I
10,000.0000	SJM HOLDINGS LIMITED HKD1.00	18,866.85	2.5056	25,056.93	6,190.08 11.48 C 6,178.60 I



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8,800.0000	WYNN MACAU LTD	19,851.95	3.9224	34,517.15	14,665.20 125.37 C 14,539.83 I
67,600.0000	AIA GROUP LTD	229,930.70	5.0255	339,729.17	109,798.47 728.62 C 109,069.85 I
12,800.0000	SANDS CHINA LTD	21,065.10	7.5544	96,697.57	75,632.47 210.35 C 75,422.12 I
2,450.0000	SWIRE PROPERTIES LTD	4,505.81	2.9224	7,160.00	2,654.19 16.04 C 2,638.15 I
11,000.0000	HANG LUNG PROPERTIES LTD	45,018.88	3.0837	33,921.05	11,097.83- 73.81 C 11,171.64- I
7,400.0000	BANK OF EAST ASIA HK\$2.50	27,544.66	4.1482	30,696.68	3,152.02 66.78 C 3,085.24 I
10,500.0000	CLP HLDGS HKD5	76,168.68	8.2060	86,163.85	9,995.17 187.48 C 9,807.69 I
10,000.0000	CATHAY PACIFIC AIRWAYS HK\$0.20	21,231.99	1.8683	18,683.03	2,548.96- 40.65 C 2,589.61- I



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9,000.0000	CHEUNG KONG(HLDGS) HK\$0.50	124,012.72	17.7411	159,670.21	35,657.49 275.00 C 35,382.49 I
3,000.0000	CHEUNG KONG INFRASTRUCTURE HLDGS HKD1	20,432.34	6.8964	20,689.39	257.05 18.67 C 238.38 I
5,100.0000	HONG KONG EXCHANGES & CLEARING HKD1	86,874.75	18.6443	95,086.03	8,211.28 206.89 C 8,004.39 I
24,000.0000	LI & FUNG HKD0.025	59,188.23	1.4812	35,549.36	23,638.87- 77.35 C 23,716.22- I
6,500.0000	MTR CORP HKD1	24,721.83	3.8514	25,034.35	312.52 54.47 C 258.05 I
5,800.0000	ESPRIT HLDGS ORD HKD0.10	46,137.02	1.4192	8,231.89	37,905.13- 17.91 C 37,923.04- I
4,000.0000	HANG LUNG GROUP LTD	21,704.61	5.4126	21,650.64	53.97- 47.11 C 101.08- I
6,500.0000	HANG SENG BANK HK\$5	97,030.80	16.3347	106,175.85	9,145.05 137.72 C 9,007.33 I



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7,366.0000	HENDERSON LAND DEVELOPMENT CO HK \$2	43,007.80	5.8513	43,101.03	93.23
					93.38 C 0.15- I
7,000.0000	POWER ASSETS HOLDINGS LIMITED	41,929.50	8.7415	61,190.78	19,261.28
					133.14 C 19,128.14 I
7,000.0000	WHARF HOLDINGS HK\$1	40,507.83	7.1996	50,397.72	9,889.89
					109.65 C 9,780.24 I
32,210.0000	HONG KONG & CHINA GAS CO LTD	51,038.08	2.1882	70,484.77	19,446.69
					153.36 C 19,293.33 I
14,000.0000	HUTCHISON WHAMPOA LTD	118,752.33	13.6768	191,475.22	72,722.89
					309.28 C 72,413.61 I
7,000.0000	HYSAN DEVELOPMENT HK\$5	20,761.01	4.6836	32,785.62	12,024.61
					71.35 C 11,953.26 I
15,000.0000	GALAXY ENTERTAINMENT GROUP LTD HKD0.10	27,663.21	7.9996	119,994.58	92,331.37
					412.75 C 91,918.62 I
4,000.0000	KERRY PROPERTIES LTD ORD HKD1	21,975.70	3.4966	13,986.47	7,989.23-
					30.44 C 8,019.67- I



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18,500.0000	BOC HONG KONG HLDG HKD5	44,646.76	2.8966	53,587.90	8,941.14 116.58 C 8,824.56 I
6,000.0000	YUE YUEN INDL HLDG HKD0.25	19,389.76	3.3482	20,089.42	699.66 43.71 C 655.95 I
12,399.0000	NEW WORLD DEVELOPMENT CO HK\$1	24,298.26	1.1380	14,110.22	10,188.04- 30.06 C 10,218.10- I
2,000.0000	ORIENT OVERSEAS INT USD0.10	16,069.20	4.8965	9,793.11	6,276.09- 15.15 C 6,291.24- I
10,000.0000	SHANGRI-LA ASIA ORD HK\$1	19,884.26	1.5663	15,663.81	4,220.45- 34.08 C 4,254.53- I
11,000.0000	SINO LAND CO ORD HK\$1.00	19,871.37	1.6463	18,110.15	1,761.22- 39.41 C 1,800.63- I
9,000.0000	SUN HUNG KAI PROPERTIES HK\$0.50	132,058.52	13.7155	123,439.59	8,618.93- 224.91 C 8,843.84- I
3,500.0000	SWIRE PACIFIC A HKD0.60	42,865.38	12.3091	43,081.93	216.55 93.75 C 122.80 I



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2,000.0000	WING HANG BANK HK\$1	23,434.90	16.1283	32,256.61	8,821.71 178.40 C 8,643.31 I
6,000.0000	WHELOCK & CO LTD HKD0.50	18,362.59	4.1740	25,044.03	6,681.44 54.49 C 6,626.95 I
800.0000	SUNTORY BEVERAGE & FOOD LTD	27,237.03	39.2379	31,390.36	4,153.33 1,154.93- C 5,308.26 I
4,000.0000	TOKYU FUDOSAN HOLDINGS CORP	35,349.32	7.8870	31,548.29	3,801.03- 291.86- C 3,509.17- I
3,800.0000	SEVEN & I HLDG CO LTD NPV	93,823.63	42.1302	160,094.76	66,271.13 12,496.51- C 78,767.64 I
1,600.0000	BANDAI NAMCO HOLDINGS INC NPV	30,521.85	23.4144	37,463.11	6,941.26 1,378.36- C 8,319.62 I
5,500.0000	MITSUBISHI CHEMICAL HOLDINGS CORP NPV	28,459.47	4.4321	24,376.88	4,082.59- 1,902.79- C 2,179.80- I
3,300.0000	DAIICHI SANKYO COMPANY LIMITED NPV	61,381.10	18.6565	61,566.56	185.46 4,805.69- C 4,991.15 I



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900.0000	SUMCO CORPORATION NPV	19,020.89	9.1604	8,244.41	10,776.48- 643.53- C 10,132.95- I
600.0000	ELECTRIC POWER DEVELOPMENT CO LTD	18,621.62	32.4761	19,485.71	864.09 1,520.99- C 2,385.08 I
1,600.0000	SEGA SAMMY HLDGS INC NPV	19,317.94	19.6732	31,477.22	12,159.28 2,457.01- C 14,616.29 I
600.0000	DENA CO LTD NPV	14,841.94	13.5235	8,114.11	6,727.83- 633.36- C 6,094.47- I
3,600.0000	GUNGHO ONLINE ENTERTAINMENT NPV	29,784.61	6.4557	23,240.71	6,543.90- 855.09- C 5,688.81- I
1,100.0000	NOMURA RL EST INC NPV	28,192.37	18.9230	20,815.36	7,377.01- 765.85- C 6,611.16- I
1,000.0000	YAMAGUCHI FIANCIAL GROUP INC NPV	10,806.72	10.5424	10,542.42	264.30- 822.91- C 558.61 I
10,000.0000	AOZORA BANK NPV	29,284.93	3.2871	32,871.03	3,586.10 1,209.42- C 4,795.52 I



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4,000.0000	FUKUOKA FINANCIAL GROUP INC NPV	17,077.81	4.8270	19,308.03	2,230.22 1,507.12- C 3,737.34 I
4,400.0000	INPEX CORPORATION	78,582.99	15.2016	66,887.12	11,695.87- 11,367.88- C 327.99- I
1,800.0000	ISETAN MITSUKOSHI HOLDINGS LTD NPV	19,720.40	13.0299	23,453.93	3,733.53 1,830.73- C 5,564.26 I
2,600.0000	MS&AD INSURANCE GROUP HOLDINGS	70,728.11	24.1547	62,802.43	7,925.68- 4,902.15- C 3,023.53- I
3,000.0000	J FRONT RETAILING CO LTD NPV	18,142.52	7.0184	21,055.23	2,912.71 1,643.51- C 4,556.22 I
1,200.0000	SONY FINANCIAL HOLDINGS INC NPV	19,452.09	17.0574	20,468.88	1,016.79 1,597.74- C 2,614.53 I
600.0000	GREE INC NPV	19,338.37	8.7656	5,259.37	14,079.00- 1,592.48- C 12,486.52- I
300.0000	TAISHO PHARMACEUTICAL HOLDINGS CO LTD	18,227.69	72.9480	21,884.41	3,656.72 1,708.23- C 5,364.95 I



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2,200.0000	OTSUKA HOLDINGS CO LTD	60,897.48	30.9955	68,190.12	7,292.64 9,906.01- C 17,198.65 I
500.0000	MEIJI HOLDINGS CO LTD	19,510.65	66.2356	33,117.81	13,607.16 2,585.07- C 16,192.23 I
5,100.0000	DAI-ICHI LIFE INSURANCE CO LTD	73,489.93	14.8956	75,967.62	2,477.69 9,511.20- C 11,988.89 I
2,100.0000	NKSJ HOLDINGS INC	56,680.99	26.9285	56,550.02	130.97- 7,116.31- C 6,985.34 I
12,265.0000	JX HOLDINGS INC	69,133.50	5.3501	65,619.96	3,513.54- 9,435.13- C 5,921.59 I
500.0000	JAPAN AIRLINES CO LTD	24,419.12	55.2786	27,639.31	3,220.19 1,817.31- C 5,037.50 I
800.0000	NIPPON PAPER INDUSTRIES CO LTD	12,446.92	18.8144	15,051.58	2,604.66 1,298.41- C 3,903.07 I
10.0000	NIPPON PROLOGIS REIT INC	20,028.43	2,331.5729	23,315.73	3,287.30 857.84- C 4,145.14 I
1,000.0000	AISIN SEIKI CO Y50	29,651.93	39.7808	39,780.86	10,128.93 3,105.17- C 13,234.10 I



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4,000.0000	AJINOMOTO CO INC Y50	39,692.08	15.6754	62,701.74	23,009.66 4,894.31- C 27,903.97 I
3,000.0000	AMADA Y50	25,712.53	10.1673	30,501.95	4,789.42 2,380.88- C 7,170.30 I
2,000.0000	ASAHI GROUP HOLDINGS LTD	37,200.67	31.3903	62,780.71	25,580.04 4,900.46- C 30,480.50 I
7,000.0000	ASAHI KASEI CORP JPY50	38,307.96	7.6501	53,551.16	15,243.20 4,180.03- C 19,423.23 I
6,000.0000	ASAHI GLASS CO Y50	69,823.12	5.8930	35,358.57	34,464.55- 2,759.97- C 31,704.58- I
5,000.0000	HIROSHIMA BK Y50	21,187.56	4.7776	23,888.26	2,700.70 1,864.64- C 4,565.34 I
3,000.0000	BANK OF KYOTO Y50	27,341.53	9.0913	27,274.07	67.46- 2,128.92- C 2,061.46 I
7,300.0000	YAHOO JAPAN CORP NPV	27,241.98	4.6197	33,723.90	6,481.92 2,632.38- C 9,114.30 I



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500.0000	BENESSE HOLDINGS INC JPY50	21,373.87	43.3838	21,691.92	318.05 1,693.20- C 2,011.25 I
500.0000	TREND MICRO INC JPY50	17,780.51	32.9203	16,460.19	1,320.32- 1,284.83- C 35.49- I
700.0000	NTT DATA CORP JPY5000	23,104.03	38.3988	26,879.23	3,775.20 2,098.11- C 5,873.31 I
10,000.0000	NTT DOCOMO INC	153,788.85	17.0968	170,968.85	17,180.00 9,641.84- C 26,821.84 I
4,000.0000	BRIDGESTONE CO Y50	83,131.91	34.9933	139,973.35	56,841.44 8,692.51- C 65,533.95 I
1,700.0000	BROTHER INDUSTRIES LTD	20,615.81	17.3239	29,450.67	8,834.86 2,298.82- C 11,133.68 I
2,100.0000	USS JPY50	31,071.72	17.0672	35,841.27	4,769.55 1,318.70- C 6,088.25 I
6,400.0000	CANON INC NPV	283,215.16	32.5354	208,226.64	74,988.52- 15,240.60- C 59,747.92- I
2,600.0000	CASIO COMPUTER CO Y50	19,654.39	14.5106	37,727.65	18,073.26 2,944.90- C 21,018.16 I



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800.0000	CENTRAL JAPAN RY Y5000	60,730.57	142.6385	114,110.85	53,380.28 8,907.13- C 62,287.41 I
4,000.0000	CHIBA BANK Y50	23,891.90	7.0578	28,231.58	4,339.68 2,203.66- C 6,543.34 I
3,300.0000	CHUBU ELECTRIC PWR Y500	81,794.62	12.4278	41,011.80	40,782.82- 3,201.24- C 37,581.58- I
2,000.0000	CHUGOKU BANK Y50	27,000.83	15.3793	30,758.60	3,757.77 2,400.92- C 6,158.69 I
1,400.0000	CHUGOKU ELECTRIC POWER CO INC Y500	27,605.57	13.6419	19,098.76	8,506.81- 1,490.79- C 7,016.02- I
1,200.0000	CHUGAI PHARMACEUTL Y50	22,869.79	28.1822	33,818.67	10,948.88 2,639.78- C 13,588.66 I
3,600.0000	RAKUTEN INC NPV	26,063.90	12.9213	46,516.95	20,453.05 3,630.98- C 24,084.03 I
3,500.0000	KDDI CORP Y5000	107,063.18	60.9940	213,479.10	106,415.92 11,313.99- C 117,729.91 I



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2,000.0000	DAIHATSU MOTOR CO Y50	34,562.96	17.7779	35,555.99	993.03 11,400.07- C 12,393.10 I
500.0000	DAITO TRUST CONSTRUCTION Y50	24,248.57	117.5657	58,782.88	34,534.31 4,588.41- C 39,122.72 I
1,200.0000	DAIKIN INDUSTRIES Y50	50,466.85	63.0965	75,715.91	25,249.06 5,910.14- C 31,159.20 I
3,000.0000	DAI NIPPON PRINTING CO Y50	41,172.00	10.4437	31,331.13	9,840.87- 2,445.61- C 7,395.26- I
3,000.0000	DAIWA HOUSE INDUSTRY CO Y50	33,953.32	20.7294	62,188.44	28,235.12 4,854.22- C 33,089.34 I
9,000.0000	DAIWA SECS GROUP NPV	47,240.80	8.6570	77,913.23	30,672.43 6,081.66- C 36,754.09 I
500.0000	LAWSON INC NPV	21,373.87	75.0209	37,510.49	16,136.62 2,927.94- C 19,064.56 I
5,600.0000	mitsubishi UFJ LEASE & FINANCE CO LTD	20,212.29	5.7450	32,172.15	11,959.86 2,511.26- C 14,471.12 I



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500.0000	DON QUIJOTE HOLDINGS CO. LTD	33,841.50	55.7721	27,886.09	5,955.41- 1,026.00- C 4,929.41- I
2,100.0000	EAST JAPAN RAILWAY CO Y50000	153,528.67	78.7621	165,400.52	11,871.85 11,267.44- C 23,139.29 I
1,300.0000	EISAI CO Y50	46,644.57	41.8932	54,461.28	7,816.71 4,251.08- C 12,067.79 I
1,020.0000	SBI HOLDINGS INC NPV	20,090.92	12.2402	12,485.07	7,605.85- 974.55- C 6,631.30- I
300.0000	FAST RETAILING CO LTD Y50	53,309.60	329.0064	98,701.94	45,392.34 7,704.36- C 53,096.70 I
71,200.0000	mitsubishi UFJ FINANCIAL GROUP NPV	375,570.47	6.1300	436,456.24	60,885.77 32,717.30- C 93,603.07 I
4,000.0000	FUJI HEAVY LTD Y50	20,527.45	27.6886	110,754.65	90,227.20 8,645.19- C 98,872.39 I
2,400.0000	FUJIFILM HOLDINGS CORP NPV	83,941.07	27.8860	66,926.61	17,014.46- 5,224.08- C 11,790.38- I



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700.0000	MIRACA HOLDINGS INC	31,250.91	48.4674	33,927.25	2,676.34 1,248.27- C 3,924.61 I
1,000.0000	FANUC CORP	108,706.03	172.4495	172,449.53	63,743.50 13,460.88- C 77,204.38 I
10,000.0000	FUJITSU NPV	65,585.62	7.4922	74,922.26	9,336.64 5,848.21- C 15,184.85 I
4,000.0000	FURUKAWA ELECTRIC CO LTD	20,953.32	2.1223	8,489.22	12,464.10- 662.63- C 11,801.47- I
3,000.0000	TONEN GEN SEKIYU JPY50	25,329.24	9.4960	28,488.23	3,158.99 2,223.70- C 5,382.69 I
800.0000	MCDONALDS CO JAPAN JPY50	19,916.46	28.0835	22,466.81	2,550.35 5,164.61- C 7,714.96 I
900.0000	NOMURA RESEARCH INSTITUTE NPV	20,506.15	31.4890	28,340.16	7,834.01 2,212.14- C 10,046.15 I
6.0000	NIPPON BUILDING FUND INC	25,552.84	5,843.7391	35,062.43	9,509.59 2,736.87- C 12,246.46 I
6.0000	JAPAN REAL ESTATE INVST CO JPY REAL ESTATE INV REIT	25,137.60	5,823.9967	34,943.98	9,806.38 2,727.62- C 12,534.00 I



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4,000.0000	GUNMA BANK Y50	22,358.73	5.9128	23,651.35	1,292.62 1,846.15- C 3,138.77 I
4,000.0000	HACHIJUNI BANK LTD/THE	22,614.26	6.1892	24,756.92	2,142.66 1,932.45- C 4,075.11 I
600.0000	HAMAMATSU PHOTONICS NPV	22,620.21	49.0597	29,435.86	6,815.65 7,895.12- C 14,710.77 I
6,000.0000	HANKYU HANSHIN HOLDINGS INC	27,724.83	5.7055	34,233.26	6,508.43 2,672.14- C 9,180.57 I
1,100.0000	DENTSU INC NPV	29,220.73	40.7186	44,790.48	15,569.75 3,496.21- C 19,065.96 I
7,800.0000	RESONA HOLDINGS INC	56,609.18	5.8239	45,427.17	11,182.01- 6,913.68- C 4,268.33- I
2,000.0000	HINO MOTORS LTD Y50	19,911.51	13.7702	27,540.59	7,629.08 2,311.75- C 9,940.83 I
400.0000	HIROSE ELECTRONICS	52,045.83	148.5612	59,424.51	7,378.68 1,715.54- C 9,094.22 I
600.0000	HISAMITSU PHARM CO NPV	22,518.43	44.7164	26,829.87	4,311.44 2,094.25- C 6,405.69 I



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28,000.0000	HITACHI NPV	124,572.20	7.3244	205,083.66	80,511.46 13,600.80- C 94,112.26 I
1,000.0000	HITACHI CHEMICAL CO LTD Y50	21,624.08	16.5440	16,544.10	5,079.98- 1,291.38- C 3,788.60- I
2,000.0000	HITACHI METALS Y50	21,102.39	15.1423	30,284.78	9,182.39 2,363.95- C 11,546.34 I
900.0000	HITACHI CONSTRUCTION MACHINERY Y50	21,330.22	19.9200	17,928.04	3,402.18- 1,399.40- C 2,002.78- I
1,100.0000	HOKKAIDO ELE POWER CO INC Y500	20,858.56	7.7291	8,502.05	12,356.51- 663.64- C 11,692.87- I
16,430.0000	SUMITOMO MITSUI TRUST HOLDINGS INC	63,413.63	4.5703	75,090.96	11,677.33 5,861.38- C 17,538.71 I
1,000.0000	HOKURIKU ELEC PWR CO INC Y500	21,666.67	13.2569	13,257.00	8,409.67- 1,034.80- C 7,374.87- I
9,400.0000	HONDA MOTOR CO NPV	336,959.01	34.9143	328,195.05	8,763.96- 23,172.19- C 14,408.23 I



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2,100.0000	HOYA PENTAX HD CORPORATION	57,283.07	33.2263	69,775.43	12,492.36 5,446.45- C 17,938.81 I
700.0000	IBIDEN CO Y50	24,072.90	20.1372	14,096.05	9,976.85- 1,100.29- C 8,876.56- I
11,000.0000	IHI CORP Y50	20,027.03	4.6591	51,251.17	31,224.14 4,000.51- C 35,224.65 I
8,000.0000	ISUZU MOTORS LTD Y50	21,805.09	6.6136	52,909.53	31,104.44 4,129.96- C 35,234.40 I
8,000.0000	ITOCHU CORP Y50	70,951.71	12.8424	102,739.25	31,787.54 8,019.50- C 39,807.04 I
2,000.0000	JAPAN STEEL WORKS Y50	23,125.32	4.3828	8,765.61	14,359.71- 684.22- C 13,675.49- I
1,000.0000	JSR CORP JPY50	20,846.86	17.1561	17,156.11	3,690.75- 1,339.16- C 2,351.59- I
2,000.0000	JGC CORP Y50	35,667.49	30.3834	60,766.99	25,099.50 4,743.26- C 29,842.76 I
6,000.0000	JAPAN TOBACCO INC Y50000	134,670.34	36.4542	218,725.63	84,055.29 13,759.94- C 97,815.23 I



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5,000.0000	JOYO BANK Y50	22,092.56	5.3304	26,652.19	4,559.63 2,080.40- C 6,640.03 I
3,200.0000	AEON CO LTD NPV	37,136.79	12.2994	39,358.37	2,221.58 3,072.20- C 5,293.78 I
9,000.0000	KAJIMA CORP Y50	22,230.97	4.4222	39,800.60	17,569.63 3,106.71- C 20,676.34 I
3,800.0000	KANSAI ELEC POWER NPV	86,096.01	9.4269	35,822.52	50,273.49- 2,796.18- C 47,477.31- I
3,000.0000	KAO CORP	77,297.33	39.3563	118,069.20	40,771.87 9,216.10- C 49,987.97 I
8,000.0000	KAWASAKI HEAVY INDUSTRIES Y50	21,975.44	3.8102	30,482.21	8,506.77 2,379.34- C 10,886.11 I
6,000.0000	KAWASAKI KISEN KAISHA Y50	24,402.96	2.0926	12,556.14	11,846.82- 980.10- C 10,866.72- I
3,000.0000	KEIKYU CORP	24,562.66	8.9827	26,948.32	2,385.66 2,103.51- C 4,489.17 I
3,000.0000	KEIO CORP Y50	19,995.09	7.8574	23,572.38	3,577.29 1,839.98- C 5,417.27 I



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2,000.0000	KIKKOMAN SHOYU CO Y50	23,529.90	20.8281	41,656.38	18,126.48 3,251.56- C 21,378.04 I
220.0000	KEYENCE CORP NPV	48,358.74	436.2568	95,976.51	47,617.77 7,491.62- C 55,109.39 I
9,000.0000	KINTETSU CORP Y50	27,884.53	3.6424	32,782.19	4,897.66 2,558.88- C 7,456.54 I
5,000.0000	KIRIN HOLDINGSCO LTD Y50	74,156.45	14.4415	72,207.69	1,948.76- 5,636.30- C 3,687.54 I
31,000.0000	KOBE STEEL	58,174.94	1.5004	46,513.00	11,661.94- 2,247.16- C 9,414.78- I
4,800.0000	KOMATSU Y50	100,882.59	23.2170	111,441.69	10,559.10 8,698.78- C 19,257.88 I
1,100.0000	KONAMI CO JPY50	21,350.45	22.1015	24,311.73	2,961.28 1,897.70- C 4,858.98 I
2,500.0000	KONICA MINOLTA INC	29,465.61	9.8810	24,702.63	4,762.98- 1,928.21- C 2,834.77- I
1,700.0000	JTEKT CORP NPV	20,760.61	16.8501	28,645.18	7,884.57 2,235.96- C 10,120.53 I



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6,000.0000	KUBOTA CORPORATION Y50	55,258.01	14.1750	85,050.10	29,792.09 6,638.74- C 36,430.83 I
2,000.0000	KURARAY CO Y50	26,894.36	12.6745	25,349.19	1,545.17- 1,978.68- C 433.51 I
800.0000	KURITA WATER INDUSTRIES NPV	22,529.08	23.1676	18,534.13	3,994.95- 1,446.71- C 2,548.24 I
1,800.0000	KYOCERA CORP Y50	89,977.92	47.4606	85,429.15	4,548.77- 6,668.33- C 2,119.56 I
2,000.0000	KYOWA HAKKO KIRIN CO LTD	21,017.20	13.5333	27,066.78	6,049.58 2,112.73- C 8,162.31 I
1,900.0000	KYUSHU ELECTRIC POWER CO INC Y500	40,863.24	11.2630	21,399.73	19,463.51- 1,670.40- C 17,793.11 I
4,800.0000	TOKIO MARINE HOLDINGS INC NPV	134,399.97	32.8907	157,875.72	23,475.75 9,254.98- C 32,730.73 I
12.0000	JAPAN RETAIL FUND JAPAN RETAIL FUND INV RETT	19,887.19	2,248.6550	26,983.86	7,096.67 6,908.63- C 14,005.30 I



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1,100.0000	AEON MALL CO NPV	31,560.14	26.3461	28,980.80	2,579.34- 1,066.28- C 1,513.06- I
2,500.0000	JFE HOLDINGS INC NPV	100,880.46	20.6406	51,601.60	49,278.86- 4,027.86- C 45,251.00- I
600.0000	MAKITA CORP Y50	20,378.38	61.7935	37,076.16	16,697.78 2,894.03- C 19,591.81 I
7,100.0000	SUMITOMO MITSUI GR NPV	238,420.76	41.8932	297,442.37	59,021.61 23,399.41- C 82,421.02 I
9,000.0000	MARUBENI CORP Y50	56,535.65	7.3145	65,830.91	9,295.26 5,138.55- C 14,433.81 I
13,000.0000	PANASONIC CORP	180,517.26	12.1810	158,353.49	22,163.77- 11,201.82- C 10,961.95- I
136,180.0000	MIZUHO FINL GP NPV	261,931.96	2.0532	279,605.55	17,673.59 25,720.23- C 43,393.82 I
1,400.0000	CREDIT SAISON CO NPV	21,181.17	20.8084	29,131.83	7,950.66 2,273.95- C 10,224.61 I
10,500.0000	SOJITZ CORPORATION NPV	20,346.44	1.7669	18,552.88	1,793.56- 1,448.18- C 345.38- I



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7,000.0000	MITSUBISHI ESTATE CO LTD	130,256.34	24.6878	172,814.77	42,558.43 10,789.07- C 53,347.50 I
7,400.0000	MITSUBISHI CORP NPV	189,376.60	20.7985	153,909.48	35,467.12- 14,995.71- C 20,471.41- I
4,000.0000	MITSUBISHI GAS & CHEML CO Y50	24,360.37	6.3965	25,586.10	1,225.73 1,997.17- C 3,222.90 I
10,000.0000	MITSUBISHI ELECTRIC CORP Y50	91,564.33	12.3389	123,389.76	31,825.43 9,631.42- C 41,456.85 I
16,000.0000	MITSUBISHI HEAVY IND NPV	67,289.14	6.2385	99,817.38	32,528.24 7,791.44- C 40,319.68 I
7,000.0000	MITSUBISHI MATERIAL CORP Y50	20,197.38	3.5042	24,529.88	4,332.50 1,914.73- C 6,247.23 I
9,000.0000	MITSUMI & CO Y50	153,221.19	16.0307	144,277.18	8,944.01- 11,261.82- C 2,317.81 I
7,000.0000	MITSUMI CHEMICALS JPY50	21,538.91	2.7343	19,140.22	2,398.69- 1,494.03- C 904.66- I
900.0000	MITSUMI ELECTRIC CO Y50	19,998.28	7.2355	6,512.02	13,486.26- 508.30- C 12,977.96- I



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5,000.0000	MITSUI O.S.K. LINES JPY50	36,093.38	3.7214	18,607.18	17,486.20- 1,452.41- C 16,033.79- I
5,000.0000	MITSUI FUDOSAN CO Y50	85,868.17	33.7199	168,599.77	82,731.60 13,160.36- C 95,891.96 I
1,800.0000	MITSUBISHI MOTOR CORP Y50	24,339.07	11.0359	19,864.76	4,474.31- 1,550.58- C 2,923.73- I
1,100.0000	MURATA MANUFACTURING CO NPV	61,954.98	93.5886	102,947.53	40,992.55 8,035.77- C 49,028.32 I
1,300.0000	SEIKO EPSON CORP NPV	20,581.74	42.5447	55,308.23	34,726.49 4,317.19- C 39,043.68 I
2,000.0000	NGK INSULATORS Y50	40,267.01	22.7037	45,407.43	5,140.42 3,544.36- C 8,684.78 I
1,000.0000	N.G.K. SPARK PLUG CO NPV	13,596.23	28.2118	28,211.84	14,615.61 2,202.12- C 16,817.73 I
500.0000	NINTENDO CO	151,492.79	119.6880	59,844.03	91,648.76- 5,912.85- C 85,735.91- I
6,000.0000	NISHI-NIPPON CITY BANK LTD NPV	17,375.92	2.4579	14,747.54	2,628.38- 1,151.14- C 1,477.24- I



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3,100.0000	DENSO CORPORATION NPV	105,139.25	47.7271	147,954.20	42,814.95 9,523.51- C 52,338.46 I
2,000.0000	TAIYO NIPPON SANSO CORP NPV	19,100.75	8.8544	17,708.90	1,391.85- 1,382.30- C 9.55- I
1,000.0000	NIDEC CORP NPV	52,968.90	61.3592	61,359.26	8,390.36 4,789.52- C 13,179.88 I
1,000.0000	NH FOODS LTD	12,882.89	19.5350	19,535.07	6,652.18 1,524.85- C 8,177.03 I
1,650.0000	NISSHIN SEIFUN GROUP INC	19,611.80	11.9342	19,691.53	79.73 1,537.05- C 1,616.78 I
2,500.0000	NIPPON TEL & TEL CORP Y50000	105,272.35	62.3661	155,915.30	50,642.95 12,170.26- C 62,813.21 I
6,000.0000	NIPPON SHEET GLASS CO Y50	17,695.34	1.4115	8,469.47	9,225.87- 661.10- C 8,564.77- I
2,000.0000	NSK LTD ORD	15,906.64	13.0003	26,000.69	10,094.05 2,029.53- C 12,123.58 I
1,000.0000	NISSAN CHEMICAL INDUSTRIES Y50	14,192.47	15.5471	15,547.11	1,354.64 1,213.56- C 2,568.20 I



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500.0000	NISSIN FOODS HOLDINGS CO LTD	16,662.57	51.4288	25,714.43	9,051.86 2,007.18- C 11,059.04 I
1,200.0000	NITTO DENKO CORP NPV	48,912.48	46.8584	56,230.20	7,317.72 7,966.62- C 15,284.34 I
4,000.0000	NIPPON EXPRESS CO Y50	17,503.69	4.8467	19,387.00	1,883.31 1,513.29- C 3,396.60 I
2,000.0000	NIKON CORP NPV	44,787.38	15.7445	31,489.07	13,298.31- 5,883.44- C 7,414.87- I
1,500.0000	YAMAHA CORP Y50	19,691.64	15.8037	23,705.64	4,014.00 1,850.38- C 5,864.38 I
3,000.0000	MINEBEA CO LTD Y50	18,493.86	11.2334	33,700.21	15,206.35 2,630.53- C 17,836.88 I
36,760.0000	NIPPON STEEL & SUMITOMO METAL NPV	122,754.95	3.1982	117,568.13	5,186.82- 13,545.21- C 8,358.39 I
1,000.0000	NIPPON ELECTRIC GLASS Y50	14,171.17	5.8239	5,824.00	8,347.17- 454.60- C 7,892.57- I



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15,300.0000	NISSAN MOTOR CO Y50	137,464.00	9.4862	145,138.94	7,674.94 9,937.44- C 17,612.38 I
18,300.0000	NOMURA HOLDING NPV	134,245.02	7.0776	129,520.75	4,724.27- 10,109.99- C 5,385.72 I
7,000.0000	NIPPON YUSEN KK Y50	27,873.88	2.8823	20,176.69	7,697.19- 1,574.93- C 6,122.26- I
500.0000	NITORI HOLDINGS CO LTD	18,898.45	54.6863	27,343.17	8,444.72 2,134.33- C 10,579.05 I
200.0000	ORIENTAL LAND CO JPY50	13,841.12	171.3143	34,262.87	20,421.75 2,674.45- C 23,096.20 I
4,000.0000	NTN CORP Y50	18,099.93	4.3630	17,452.25	647.68- 1,362.27- C 714.59 I
3,000.0000	ODAKYU ELECTRIC RAILWAY CO Y50	24,786.25	9.6244	28,873.20	4,086.95 2,253.75- C 6,340.70 I
4,000.0000	OBAYASHI CORP Y50	17,674.04	7.1368	28,547.46	10,873.42 2,228.31- C 13,101.73 I
4,000.0000	OJI HOLDINGS CORP JPY50	17,674.04	4.1162	16,465.13	1,208.91- 1,285.21- C 76.30 I



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1,000.0000	OLYMPUS CORP Y50	32,473.40	34.4504	34,450.42	1,977.02 2,689.10- C 4,666.12 I
1,000.0000	OMRON CORP Y50	23,072.07	42.1499	42,149.94	19,077.87 3,290.08- C 22,367.95 I
400.0000	ONO PHARMACEUTICAL CO Y50	17,503.69	88.0509	35,220.37	17,716.68 2,749.19- C 20,465.87 I
9,000.0000	TAIHEIYO CEMENT CORP Y50	20,268.47	4.0274	36,246.98	15,978.51 10,715.54- C 26,694.05 I
7,000.0000	ORIX CORP Y50	76,787.69	16.5737	116,015.99	39,228.30 7,088.34- C 46,316.64 I
9,000.0000	OSAKA GAS CO Y50	31,909.10	4.2051	37,846.11	5,937.01 2,954.15- C 8,891.16 I
9,000.0000	HOKUHOKU FINANCIAL GROUP INC NPV	19,739.56	2.1321	19,189.58	549.98- 1,497.87- C 947.89 I
20.0000	UNITED URBAN INVES UNITED URBAN INVEST REIT	30,554.62	1,613.9380	32,278.76	1,724.14 1,187.62- C 2,911.76 I



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8,000.0000	SHINSEI BK NPV	17,183.69	2.2506	18,005.03	821.34 208.57- C 1,029.91 I
3,000.0000	RICOH Y50	48,199.03	11.9145	35,743.55	12,455.48- 2,790.02- C 9,665.46- I
300.0000	RINNAI CORP	21,724.06	96.5401	28,962.05	7,237.99 450.02- C 7,688.01 I
1,500.0000	JAPAN EXCHANGE GROUP INC	34,673.28	24.6285	36,942.89	2,269.61 651.28- C 2,920.89 I
2,000.0000	GS YUASA CORP NPV	13,308.77	6.3669	12,733.82	574.95- 993.97- C 419.02 I
2,800.0000	T&D HOLDINGS INC NPV	33,090.92	13.5926	38,059.33	4,968.41 2,970.78- C 7,939.19 I
400.0000	ROHM CO Y50	29,769.06	57.3515	22,940.62	6,828.44- 1,790.68- C 5,037.76- I
400.0000	SMC CORP NPV	73,267.72	267.6077	107,043.09	33,775.37 5,533.90- C 39,309.27 I
5,300.0000	SOFTBANK CORPORATION NPV	173,436.85	74.4583	394,629.09	221,192.24 32,832.41- C 254,024.65 I



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400.0000	SANKYO CO(OTC) NPV	19,313.68	38.4482	15,379.30	3,934.38- 1,200.45- C 2,733.93- I
500.0000	SANTEN PHARMACEUTICAL CO	21,057.94	56.2657	28,132.87	7,074.93 7,152.50- C 14,227.43 I
1,000.0000	SECOM CO Y50	44,078.64	61.1026	61,102.61	17,023.97 4,769.48- C 21,793.45 I
2,000.0000	SEKISUI CHEMICAL Y50	13,670.77	11.5788	23,157.79	9,487.02 1,807.63- C 11,294.65 I
4,000.0000	SEKISUI HOUSE NPV	47,944.81	13.7110	54,844.28	6,899.47 2,935.29- C 9,834.76 I
4,000.0000	SHARP CORP Y50	50,126.15	3.2081	12,832.54	37,293.61- 1,001.66- C 36,291.95- I
200.0000	SHIMAMURA NPV	21,468.14	98.3169	19,663.39	1,804.75- 441.58- C 1,363.17- I
800.0000	SHIKOKU ELECTRIC POWER CO INC Y500	22,222.44	13.9578	11,166.28	11,056.16- 871.60- C 10,184.56- I



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4,000.0000	SHIMIZU CORPORATION Y50	16,694.52	7.0776	28,310.55	11,616.03 2,209.83- C 13,825.86 I
2,500.0000	SHIN-ETSU CHEMICALS CO NPV	146,016.96	60.7867	151,966.83	5,949.87 10,609.70- C 16,559.57 I
1,000.0000	SHIONOGI & CO JPY50	19,058.15	20.8676	20,867.68	1,809.53 1,628.85- C 3,438.38 I
400.0000	SHIMANO INC NPV	17,801.81	110.9520	44,380.83	26,579.02 3,464.23- C 30,043.25 I
2,700.0000	SHISEIDO Y50	51,809.04	18.2320	49,226.59	2,582.45- 2,641.85- C 59.40 I
1,700.0000	HULIC CO LTD	28,565.09	13.1780	22,402.65	6,162.44- 824.25- C 5,338.19- I
5,000.0000	SHIZUOKA BANK Y50	45,897.76	10.8089	54,044.72	8,146.96 7,334.72- C 15,481.68 I
8,000.0000	SHOWA DENKO KK Y50	18,057.33	1.4214	11,371.60	6,685.73- 887.63- C 5,798.10- I
4,900.0000	SONY CORP NPV	186,248.22	16.6033	81,356.30	104,891.92- 6,350.41- C 98,541.51- I



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1,000.0000	STANLEY ELECTRIC CO NPV	19,239.15	26.0697	26,069.79	6,830.64 2,034.92- C 8,865.56 I
7,000.0000	SUMITOMO CHEMICAL Y50	34,283.38	3.7806	26,464.64	7,818.74- 2,065.74- C 5,753.00- I
3,700.0000	SUMITOMO ELECTRIC IND NPV	46,169.71	14.0664	52,045.80	5,876.09 4,062.53- C 9,938.62 I
3,000.0000	SUMITOMO HEAVY INDUSTRIES Y50	18,142.52	4.7579	14,273.73	3,868.79- 1,114.17- C 2,754.62 I
2,000.0000	SUMITOMO METAL MNG NPV	30,386.58	16.2380	32,476.19	2,089.61 2,534.98- C 4,624.59 I
2,000.0000	SUMITOMO REALTY & DEV CO NPV	42,810.47	42.9100	85,820.05	43,009.58 15,296.63- C 58,306.21 I
5,500.0000	SUMITOMO CORP NPV	64,297.32	13.5037	74,270.77	9,973.45 5,797.34- C 15,770.79 I
2,000.0000	SURUGA BANK LTD Y50	17,950.87	19.4067	38,813.48	20,862.61 3,029.67- C 23,892.28 I
1,700.0000	SUZUKI MOTOR CO NPV	37,865.04	31.3212	53,246.14	15,381.10 4,156.22- C 19,537.32 I



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500.0000	SUZUKEN CO LTD Y50	17,514.34	37.2143	18,607.18	1,092.84 1,452.42- C 2,545.26 I
900.0000	THK CO Y50	19,643.74	23.5723	21,215.14	1,571.40 1,655.99- C 3,227.39 I
500.0000	TDK CORP	33,538.10	46.8881	23,444.05	10,094.05- 1,829.98- C 8,264.07- I
9,000.0000	TAISEI CORP Y50	19,835.39	5.5377	49,839.59	30,004.20 3,890.34- C 33,894.54 I
2,000.0000	TAKASHIMAYA CO	16,843.58	9.7033	19,406.74	2,563.16 1,514.83- C 4,077.99 I
4,700.0000	TAKEDA PHARMACEUTICAL CO LTD NPV	212,555.53	46.3846	218,007.99	5,452.46 14,442.18- C 19,894.64 I
800.0000	ADVANTEST NPV	20,135.63	12.3587	9,886.97	10,248.66- 771.75- C 9,476.91- I
1,000.0000	MITSUBISHI TANABE PHARM CORP NPV	14,181.83	14.9745	14,974.58	792.75 1,168.88- C 1,961.63 I



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5,000.0000	TEIJIN Y50	16,875.51	2.5072	12,536.40	4,339.11- 978.55- C 3,360.56- I
800.0000	SYSMEX CORP JPY50	26,540.74	37.5598	30,047.87	3,507.13 1,105.54- C 4,612.67 I
1,600.0000	TERUMO CORP Y50	43,439.82	22.3582	35,773.16	7,666.66- 2,792.34- C 4,874.32- I
3,000.0000	TOBU RAILWAY CO Y50	16,545.46	5.2317	15,695.18	850.28- 1,225.11- C 374.83 I
1,200.0000	TOHO CO Y500	19,177.40	23.4539	28,144.71	8,967.31 2,196.89- C 11,164.20 I
5,000.0000	TOHO GAS Y50	30,434.93	5.4982	27,491.24	2,943.69- 6,989.39- C 4,045.70 I
2,100.0000	TOHOKU ELEC PWR Y500	43,733.67	11.7368	24,647.35	19,086.32- 1,923.90- C 17,162.42- I
7,400.0000	TOKYO ELECTRIC PWR CO NPV	192,433.97	4.1656	30,825.72	161,608.25- 3,116.76- C 158,491.49- I
3,000.0000	TOKYO TATEMONO CO Y50	28,721.76	9.2492	27,747.89	973.87- 1,020.92- C 47.05 I



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14,000.0000	TOKYO GAS CO NPV	65,486.63	5.8437	81,812.35	16,325.72 4,998.65- C 21,324.37 I
800.0000	TOKYO ELECTRON NPV	54,257.19	67.5978	54,078.28	178.91- 4,221.18- C 4,042.27 I
5,000.0000	TOKYU CORP NPV	20,761.68	7.0875	35,437.54	14,675.86 2,766.15- C 17,442.01 I
2,000.0000	TOPPAN PRINTING Y50	17,823.11	7.7390	15,478.01	2,345.10- 1,208.17- C 1,136.93- I
10,000.0000	TORAY INDUSTRIES INC Y50	60,383.28	6.5742	65,742.07	5,358.79 3,968.59- C 9,327.38 I
20,000.0000	TOSHIBA CORP NPV	103,701.93	4.6690	93,381.37	10,320.56- 7,289.06- C 3,031.50- I
2,000.0000	TOTO Y50	28,117.62	13.4741	26,948.32	1,169.30- 991.50- C 177.80- I
1,200.0000	LIXIL GROUP CORPORATION	24,581.82	26.9878	32,385.37	7,803.55 2,527.89- C 10,331.44 I
1,100.0000	TOYO SEIKAN GROUP HOLDINGS LTD	19,722.52	15.3595	16,895.51	2,827.01- 1,318.81- C 1,508.20- I



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15,000.0000	MAZDA MOTOR CORP NPV	49,730.16	4.6888	70,332.16	20,602.00 3,341.72- C 23,943.72 I
800.0000	TOYOTA INDUSTRIES CORP Y50	22,724.98	51.6262	41,301.02	18,576.04 3,223.82- C 21,799.86 I
700.0000	TOYODA GOSEI Y50	19,385.01	20.7689	14,538.28	4,846.73- 1,134.80- C 3,711.93- I
1,200.0000	TOYOTA TSUSHU CORP Y50	19,049.63	28.7547	34,505.70	15,456.07 2,693.40- C 18,149.47 I
15,300.0000	TOYOTA MOTOR CORP NPV	633,618.26	60.0562	918,860.86	285,242.60 74,767.99- C 360,010.59 I
7,000.0000	UBE INDUSTRIES LTD/JAPAN Y50	18,259.63	1.7373	12,161.29	6,098.34- 949.28- C 5,149.06- I
1,000.0000	UNICHARM CORP	40,677.61	59.5923	59,592.32	18,914.71 8,853.86- C 27,768.57 I
800.0000	WEST JAPAN RAILWAY CO JPY50000	27,639.65	44.0254	35,220.37	7,580.72 2,749.19- C 10,329.91 I
4,300.0000	YAMADA DENKI CO NPV	32,322.19	3.5634	15,323.03	16,999.16- 1,196.07- C 15,803.09- I



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700.0000	YAKULT HONSHA Y50	18,520.48	50.6391	35,447.41	16,926.93 2,766.92- C 19,693.85 I
1,300.0000	YAMAHA MOTOR CO Y50	19,169.95	17.2054	22,367.11	3,197.16 1,745.91- C 4,943.07 I
11,000.0000	ASTELLAS PHARMA INC Y50	79,991.02	13.1385	144,523.96	64,532.94 11,281.08- C 75,814.02 I
2,300.0000	YAMATO HOLDINGS CO LTD NPV	42,383.21	20.7196	47,655.10	5,271.89 2,390.46- C 7,662.35 I
2,000.0000	YASKAWA ELECTRIC MFG Y50	18,589.69	12.1119	24,223.88	5,634.19 1,890.84- C 7,525.03 I
2,300.0000	YOKOGAWA ELECTRIC CORP Y50	32,622.92	12.6449	29,083.46	3,539.46- 97.29 C 3,636.75- I
6,000.0000	BANK OF YOKOHAMA Y50	29,385.77	5.7548	34,529.39	5,143.62 2,695.27- C 7,838.89 I
14,000.0000	OVERSEA-CHINESE BKG CORP SGD0.5 (POST SUBDIVISION)	92,502.96	7.6605	107,247.42	14,744.46 9,767.74 C 4,976.72 I



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13,909.0000	NOBLE GROUP HKD0.25	19,727.18	1.0989	15,285.23	4,441.95- 1,647.98 C 6,089.93- I
7,000.0000	SINGAPORE PRESS HLDGS SGD0.20	19,154.14	3.3449	23,414.75	4,260.61 2,524.45 C 1,736.16 I
39,000.0000	SINGAPORE TELECOMMUNICATIONS SGD0.15 (POST RE-ORGANIZATION)	89,116.13	3.0882	120,442.79	31,326.66 12,985.55 C 18,341.11 I
6,000.0000	SEMBCORP INDUSTRIES SGD0.25 (POST REORGANIZATION)	18,394.84	4.3075	25,845.27	7,450.43 2,786.51 C 4,663.92 I
7,000.0000	STARHUB LTD	23,320.92	3.3449	23,414.75	93.83 282.97 C 189.14- I
10,600.0000	KEPPEL CORP NPV	75,744.14	8.6551	91,745.08	16,000.94 5,329.65 C 10,671.29 I
1,848.0000	KEPPEL REIT	1,989.25	1.0267	1,897.44	91.81- 6.75 C 98.56- I
16,000.0000	WILMAR INTERNATIONAL LTD SGD0.5	57,532.58	2.5588	40,941.72	16,590.86- 2,277.75 C 18,868.61- I



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12,742.0000	GLOBAL LOGISTIC PROPERTIES LTD	25,879.81	2.1658	27,596.68	1,716.87 431.67- C 2,148.54 I
1,200.0000	KEPPEL INFRASTRUCTURE TRUST	780.57	0.8382	1,005.90	225.33 99.57 C 125.76 I
9,000.0000	SINGAPORE TECHNOLOGIES ENGINEERING SGD0.10	21,016.54	3.0481	27,433.52	6,416.98 2,957.74 C 3,459.24 I
9,000.0000	DBS HLDGS SGD1	93,865.27	13.4360	120,924.08	27,058.81 13,037.44 C 14,021.37 I
3,000.0000	CITY DEVELOPMENTS SGD0.50	23,337.39	8.2059	24,617.98	1,280.59 2,654.18 C 1,373.59- I
7,000.0000	SEMBCORP MARINE SGD0.10	21,510.80	3.2888	23,021.70	1,510.90 2,482.08 C 971.18- I
1,000.0000	JARDINE CYCLE & CARRIAGE LTD	22,406.17	35.5031	35,503.15	13,096.98 3,827.78 C 9,269.20 I
5,000.0000	SINGAPORE EXCHANGE SGD0.01	27,685.38	5.5749	27,874.70	189.32 3,005.31 C 2,815.99- I



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13,000.0000	CAPITALAND SGD1	37,620.60	2.5668	33,369.43	4,251.17- 3,597.73 C 7,848.90- I
44,000.0000	GENTING SINGAPORE PLC USD0.10 CLOB	42,332.79	1.0668	46,941.80	4,609.01 2,368.80 C 2,240.21 I
16,000.0000	CAPITAMALL TRUST SGD1 UNITS	20,607.34	1.5842	25,347.93	4,740.59 2,734.84 C 2,005.75 I
15,000.0000	ASCENDAS REAL ESTATE INV TRUST NPV(REAL ESTATE INV TRUSTS)	20,779.81	1.8449	27,674.17	6,894.36 2,991.82 C 3,902.54 I
18,000.0000	COMFORTDELGRO CORP SGD0.25	20,113.99	2.0053	36,096.74	15,982.75 3,891.76 C 12,090.99 I
5,000.0000	SINGAPORE AIRLINES SGD0.50 (1000 BOARD LOT)	56,316.87	8.3182	41,591.47	14,725.40- 2,686.85 C 17,412.25- I
7,000.0000	UNITED OVERSEAS BANK SG\$1	101,265.82	18.0644	126,450.89	25,185.07 11,468.63 C 13,716.44 I
4,983.0000	BANK HAPOALIM B.M. ILS1	20,845.61	5.7863	28,833.46	7,987.85 2,547.18 C 5,440.67 I



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10,903.0000	BANK LEUMI LE ISRAEL B M ORD ILS1	52,609.98	3.9052	42,578.54	10,031.44- 1,767.50 C 11,798.94- I
8,425.0000	BEZEQ-ISRAELI TELECOMMUNICATNS CORP SHK1	18,371.54	1.8753	15,799.56	2,571.98- 1,419.41 C 3,991.39- I
974.0000	PARTNER COMMUNICAT ILS0.01	19,732.69	7.8483	7,644.28	12,088.41- 511.24 C 12,599.65- I
6,025.0000	ISRAEL CHEMICALS LTD	64,322.61	8.5745	51,661.68	12,660.93- 2,839.87 C 15,500.80- I
18.0000	ISRAEL CORP ORD SHK1	20,572.89	570.1786	10,263.22	10,309.67- 515.71 C 10,825.38- I
66.0000	PROTHENA CORP PLC	386.40	22.5500	1,488.30	1,101.90 I
208.0000	PERRIGO CO PLC	32,354.40	145.7600	30,318.08	2,036.32-I
2,006.0000	TRANSOCEAN LTD	93,154.76	45.0300	90,330.18	2,824.58-I
11,570.0000	NOVO NORDISK A/S-B	200,893.77	46.0221	532,476.68	331,582.91 9,076.74 C 322,506.17 I
1,000.0000	DSV DKK1 (POST SUBDIVISION)	18,674.67	32.5975	32,597.52	13,922.85 1,044.21 C 12,878.64 I



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542.0000	PANDORA A/S	39,667.30	76.6730	41,556.78	1,889.48 33.22- C 1,922.70 I
1,000.0000	NOVOZYMES A/S	26,215.68	50.1542	50,154.26	23,938.58 1,606.61 C 22,331.97 I
750.0000	COLOPLAST-B	17,381.99	90.4282	67,821.20	50,439.21 3,203.45 C 47,235.76 I
550.0000	CARLSBERG A/S	49,007.67	107.7095	59,240.25	10,232.58 1,897.67 C 8,334.91 I
35.0000	A P MOLLER - MAERSK A/S DNKR1000	62,896.29	2,484.7572	86,966.50	24,070.21 2,785.83 C 21,284.38 I
23.0000	AP MOLLER MAERSK A/S	47,570.59	2,352.5306	54,108.21	6,537.62 1,085.06 C 5,452.56 I
3,400.0000	DANSKE BANK AS DKK10	75,581.20	28.2634	96,095.64	20,514.44 1,524.48 C 18,989.96 I
4,600.0000	TDC A/S DKK5	37,205.31	10.3485	47,603.39	10,398.08 1,356.36 C 9,041.72 I



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1,417.0000	VESTAS WIND SYSTEM DKK1	78,835.69	50.4481	71,484.96	7,350.73- 1,582.19 C 8,932.92- I
600.0000	VALMET CORP	4,559.13	11.9663	7,179.82	2,620.69 80.76 C 2,539.93 I
1,150.0000	NESTE OIL OYJ EUR3.4	20,342.14	19.5103	22,436.95	2,094.81 252.37 C 1,842.44 I
771.0000	NOKIAN RENKAAT OYJ (NOKIA TYRE NPV	20,049.85	39.0207	30,085.02	10,035.17 338.39 C 9,696.78 I
1,644.0000	KONE CORPORATION NPV ORD B	40,716.64	41.7316	68,606.90	27,890.26 2,276.60 C 25,613.66 I
1,109.0000	ORION OYJ NPV	29,103.66	37.2819	41,345.69	12,242.03 1,032.77 C 11,209.26 I
507.0000	KESKO OYJ EUR2 SER'B'	19,852.33	39.5273	20,040.37	188.04 225.42 C 37.38- I
790.0000	WARTSILA 'B'EUR3.5	20,559.99	49.5906	39,176.58	18,616.59 440.66 C 18,175.93 I



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36.0000	OUTOKUMPU OY ORD A FIM10	1,889.97	10.0564	362.03	1,527.94- 4.07 C 1,532.01- I
924.0000	RAUTARUUKKI OY 'K'NPV	20,461.86	14.0474	12,979.87	7,481.99- 146.00 C 7,627.99- I
2,586.0000	UPM-KYMMENE OY NPV	34,955.42	17.0869	44,186.96	9,231.54 497.01 C 8,734.53 I
2,894.0000	STORA ENSO OYJ SER 'R' NPV	21,440.83	9.7346	28,172.10	6,731.27 316.88 C 6,414.39 I
2,529.0000	SAMPO OYJ SER'A'NPV	81,427.17	50.5900	127,942.34	46,515.17 606.67 C 45,908.50 I
2,209.0000	FORTUM OYJ FIM20	54,752.30	26.8490	59,309.51	4,557.21 667.10 C 3,890.11 I
971.0000	ELISA CORPORATION EUR0.5	20,108.61	30.5868	29,699.79	9,591.18 334.06 C 9,257.12 I
600.0000	METSO OYJ EUR1.70	15,887.30	37.8843	22,730.63	6,843.33 255.67 C 6,587.66 I



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<u>SHARES/ PAR VALUE</u>	<u>SECURITY DESCRIPTION</u>	<u>COST</u>	<u>PRICE</u>	<u>MARKET VALUE</u>	<u>UNREALIZED GAIN/LOSS</u>
22,385.0000	NOKIA (AB) OY EUR0.06	319,050.64	7.5714	169,485.78	149,564.86- 1,697.29 C 151,262.15- I
181.0000	REC SOLAR AS	611.76	15.2290	2,756.46	2,144.70 101.99- C 2,246.69 I
10,500.0000	REC SILICON ASA	34,728.40	0.5778	6,067.66	28,660.74- 376.60- C 28,284.14- I
1,946.0000	SEADRILL LTD USD2	62,110.80	39.6493	77,157.54	15,046.74 2,733.98- C 17,780.72 I
1,350.0000	AKER SOLUTIONS NOK1.66 (POST SUBDIVISION)	17,288.57	17.3720	23,452.24	6,163.67 700.83- C 6,864.50 I
2,600.0000	ORKLA ASA NOK1.25 (POST SUBDIVISION)	24,390.85	8.9060	23,155.65	1,235.20- 529.57- C 705.63- I
5,450.0000	NORSK HYDRO ASA NOK3.6666	30,877.34	5.3501	29,158.21	1,719.13- 871.32- C 847.81- I
1,834.0000	GJENSIDIGE FORSIKRING ASA	25,861.87	17.9261	32,876.49	7,014.62 2,522.71- C 9,537.33 I



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<u>SHARES/ PAR VALUE</u>	<u>SECURITY DESCRIPTION</u>	<u>COST</u>	<u>PRICE</u>	<u>MARKET VALUE</u>	<u>UNREALIZED GAIN/LOSS</u>
1,350.0000	KVAERNER ASA	2,490.12	2.0533	2,772.03	281.91 82.83- C 364.74 I
6,100.0000	DNB ASA	80,773.88	18.2846	111,536.27	30,762.39 6,011.39- C 36,773.78 I
4,000.0000	TELENOR ASA	65,018.01	22.7661	91,064.65	26,046.64 2,721.27- C 28,767.91 I
900.0000	SUBSEA 7 SA	22,584.26	18.6431	16,778.84	5,805.42- 2,139.46- C 3,665.96- I
6,664.0000	STATOIL ASA NOK2.50	156,842.85	30.7025	204,601.73	47,758.88 7,288.36- C 55,047.24 I
900.0000	YARA INTL NOK1.70	36,270.39	50.0790	45,071.13	8,800.74 1,346.87- C 10,147.61 I
1,692.0000	ELEKTA SER B NPV	19,675.57	12.7143	21,512.71	1,837.14 1,024.65 C 812.49 I
1,000.0000	KINNEVIK INVESTMENT AB SEK0.1	18,892.75	42.6006	42,600.61	23,707.86 2,910.82 C 20,797.04 I
375.0000	MILlicom INTL CELL SDR EACH REP 1 USD1.50	34,090.61	91.5434	34,328.79	238.18 2,345.62 C 2,107.44- I



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1,100.0000	ELECTROLUX AB SER 'B' NPV	28,167.45	25.2791	27,807.07	360.38- 90.39 C 450.77- I
4,194.0000	ATLAS COPCO AB SER A NPV (POST SPLIT)	77,703.50	28.8840	121,139.72	43,436.22 3,251.83 C 40,184.39 I
1,800.0000	ATLAS COPCO AB SER'B'NPV (POST SPLIT)	25,016.42	26.7001	48,060.31	23,043.89 3,283.88 C 19,760.01 I
8,575.0000	VOLVO (AB) SER B NPV (POST SPLIT)	97,866.16	13.7689	118,068.43	20,202.27 2,214.52 C 17,987.75 I
1,800.0000	SKF AB SER B NPV (POST SPLIT)	32,501.10	25.5035	45,906.35	13,405.25 3,136.71 C 10,268.54 I
7,098.0000	SANDVIK AB NPV (POST SPLIT)	95,041.07	13.6567	96,935.45	1,894.38 3,240.29 C 1,345.91- I
2,800.0000	SVENSKA CELLULOOSA AB-SCA SER B NPV (POST SPLIT)	39,508.85	26.0420	72,917.65	33,408.80 4,982.34 C 28,426.46 I
3,000.0000	BOLIDEN AB NPV (POST SPLIT)	52,918.99	14.5018	43,505.58	9,413.41- 513.07 C 9,926.48- I



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1,000.0000	HEXAGON AB	20,628.12	32.2197	32,219.70	11,591.58 811.80 C 10,779.78 I
2,800.0000	HUSQVARNA AB SER B NPV	20,398.59	7.7707	21,758.02	1,359.43 1,486.69 C 127.26- I
1,200.0000	RATOS AB SER B NPV	20,245.22	9.2440	11,092.91	9,152.31- 757.96 C 9,910.27- I
1,000.0000	SSAB AB NPV	18,390.80	9.2964	9,296.45	9,094.35- 635.21 C 9,729.56- I
502.0000	ETRION CORP	279.38	0.5205	261.31	18.07- 0.31 C 18.38- I
1,500.0000	TELE2 AB-B SHS	19,070.36	11.7720	17,658.01	1,412.35- 1,206.53 C 2,618.88- I
7,600.0000	SKANDINAVISKA ENSKILDA BANKEN SER A SWKR10	49,380.49	13.3575	101,517.50	52,137.01 6,936.51 C 45,200.50 I
5,200.0000	SWEDBANK AB SEK'A' NPV	68,785.74	26.5057	137,829.73	69,043.99 698.31- C 69,742.30 I



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<u>SHARES/ PAR VALUE</u>	<u>SECURITY DESCRIPTION</u>	<u>COST</u>	<u>PRICE</u>	<u>MARKET VALUE</u>	<u>UNREALIZED GAIN/LOSS</u>
1,400.0000	SWEDISH MATCH AB NPV	33,672.32	34.7027	48,583.84	14,911.52 3,319.64 C 11,591.88 I
16,200.0000	NORDEA BANK AB EURO.39632	166,019.16	14.1054	228,508.60	62,489.44 15,613.60 C 46,875.84 I
2,000.0000	SECURITAS SER 'B' SEK1	21,514.03	11.8542	23,708.56	2,194.53 1,619.97 C 574.56 I
3,179.0000	INVESTOR AB SEK 6.25 'B'	76,811.40	37.4999	119,212.20	42,400.80 4,506.19 C 37,894.61 I
5,772.0000	HENNES & MAURITZ AB	199,499.90	43.6775	252,107.07	52,607.17 13,496.36 C 39,110.81 I
1,600.0000	ASSA ABLOY SER B NPV	31,611.54	50.8574	81,371.96	49,760.42 5,560.02 C 44,200.40 I
2,500.0000	SVENSKA HANDELSBANKEN SER A NPV	74,420.70	48.9278	122,319.70	47,899.00 8,357.90 C 39,541.10 I
17,394.0000	ERICSSON (L.M.) TELEFONAKTIEBOLAGET SEK1 SER B	189,691.56	12.0786	210,096.03	20,404.47 10,756.24 C 9,648.23 I



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<u>SHARES/ PAR VALUE</u>	<u>SECURITY DESCRIPTION</u>	<u>COST</u>	<u>PRICE</u>	<u>MARKET VALUE</u>	<u>UNREALIZED GAIN/LOSS</u>
17,607.0000	TELIASONERA AB NPV	135,997.26	7.3010	128,549.39	7,447.87- 3,150.94 C 10,598.81- I
1,800.0000	SKANSKA AB B SER 'B' SEK3	33,329.32	22.8110	41,059.93	7,730.61 2,805.55 C 4,925.06 I
1,200.0000	LUNDIN PETROLEUM A ORD	30,539.62	20.2233	24,267.99	6,271.63- 246.49 C 6,518.12- I
1,500.0000	ALFA LAVAL AB ORD NPV	22,545.81	25.7578	38,636.72	16,090.91 2,639.98 C 13,450.93 I
800.0000	GETINGE AB SER'B'NPV	19,207.86	26.2663	21,013.11	1,805.25 1,435.79 C 369.46 I
4,810.0000	TEVA PHARMACEUTICAL INDUSTRIES ADR	256,271.36	52.4200	252,140.20	4,131.16-I
TOTAL INVESTMENTS EQUITY		64,193,614.66		76,504,703.52	12,311,088.86 1,824,523.53 C 10,486,565.33 I
TOTAL INVESTMENT		64,645,341.91		77,173,165.65	12,527,823.74 1,826,697.75 C 10,701,125.99 I



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<u>SHARES/ PAR VALUE</u>	<u>SECURITY DESCRIPTION</u>	<u>COST</u>	<u>PRICE</u>	<u>MARKET VALUE</u>	<u>UNREALIZED GAIN/LOSS</u>
<u>INVESTMENTS REAL ESTATE</u>					
763.5870	PRIME PROPERTY FUND LLC	7,824,402.93	15,091.4643	11,523,646.00	3,699,243.07
1,773,169.0000	FORTRESS JAPAN OPPORTUNITY DOMESTIC FUND © LP	785,853.00	0.5949	1,055,007.18	269,154.18
717,581.0000	BRAZIL REAL ESTATE OPPORTUNITIES FUND I I	698,318.45	0.8232	590,716.98	107,601.47-
1,828,783.2300	BROOKFIELD REAL ESTATE FUND	872,710.88	0.5922	1,083,135.27	210,424.39
2,111,937.2570	EXETER INDUSTRIAL VALUE FUND I I LPP	1,528,652.50	0.8853	1,869,757.19	341,104.69
1,839,324.0200	DIVCOWEST FUND I I I	1,600,140.02	1.2466	2,293,039.27	692,899.25
3,750,000.0000	JAMESTOWN PREMIER PROPERTY	3,750,000.00	1.4742	5,528,381.25	1,778,381.25
1,768,515.0000	BROOKFIELD FAIRFIELD MULTIFAMILY	1,558,634.00	1.1058	1,955,623.89	396,989.89
9,375,000.0000	HEITMAN AMERICA RE TRUST	8,818,341.00	1.1086	10,393,828.13	1,575,487.13
446,352.0000	CVI EUROPE REAL ESTATE PARTNER TG LLC	446,352.00	1.0635	474,731.06	28,379.06
750,000.0000	SAVANNA REAL ESTATE FUND I I A LP LLC	750,000.00	0.9594	719,595.00	30,405.00-
4,436,142.9300	USAA EAGLE REAL ESTATE LP	4,373,982.93	1.1237	4,984,938.17	610,955.24



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<u>SHARES/ PAR VALUE</u>	<u>SECURITY DESCRIPTION</u>	<u>COST</u>	<u>PRICE</u>	<u>MARKET VALUE</u>	<u>UNREALIZED GAIN/LOSS</u>
8,250,000.0000	PRISA REAL ESTATE LP	8,250,000.00	1.0315	8,510,675.25	260,675.25
104,039.6600	NORTHLIGHT REAL ESTATE OPPORTUNITY FUND	104,039.66	1.0000	104,039.66	0.00
7,500,000.0000	UBS TRUMBULL PROPERTY FUND	7,070,105.82	1.0878	8,159,212.50	1,089,106.68
1,720,682.9380	TTG BRPTP FUND LP	1,582,534.29	2.0186	3,473,375.74	1,890,841.45
895,500.2900	CITIC CAPITAL CHINA	489,386.96	0.5478	490,586.40	1,199.44
TOTAL INVESTMENTS REAL ESTATE		50,503,454.44		63,210,288.94	12,706,834.50
TOTAL INVESTMENT		50,503,454.44		63,210,288.94	12,706,834.50



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GRESHAM- MONTICELLO

EXCEL ENERGY-NDT

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<u>SHARES/ PAR VALUE</u>	<u>SECURITY DESCRIPTION</u>	<u>COST</u>	<u>PRICE</u>	<u>MARKET VALUE</u>	<u>UNREALIZED GAIN/LOSS</u>
<u>INVESTMENTS OTHER</u>					
34,410,168.1100	GRESHAM A+ FUND LLC	35,988,766.11	0.8859	30,485,902.00	5,502,864.11-
TOTAL INVESTMENTS OTHER		35,988,766.11		30,485,902.00	5,502,864.11-
TOTAL INVESTMENT		35,988,766.11		30,485,902.00	5,502,864.11-



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INVESTMENT DETAIL
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WELLINGTON-MONTICELLO
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<u>SHARES/ PAR VALUE</u>	<u>SECURITY DESCRIPTION</u>	<u>COST</u>	<u>PRICE</u>	<u>MARKET VALUE</u>	<u>UNREALIZED GAIN/LOSS</u>
INVESTMENTS FIXED INCOME SECURITIES					
3,013,578.3490	WTC-CTF JPM PAG EMERGING MARKETS DEBT	29,668,605.28	10.6099	31,974,063.69	2,305,458.41
TOTAL INVESTMENTS FIXED INCOME SECURITIES		29,668,605.28		31,974,063.69	2,305,458.41
TOTAL INVESTMENT		29,668,605.28		31,974,063.69	2,305,458.41



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INVESTMENT DETAIL

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STEPSTONE-MONTI
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<u>SHARES/ PAR VALUE</u>	<u>SECURITY DESCRIPTION</u>	<u>COST</u>	<u>PRICE</u>	<u>MARKET VALUE</u>	<u>UNREALIZED GAIN/LOSS</u>
<u>INVESTMENTS PRIVATE EQUITY</u>					
24,736,120.9200	STEPSTONE XL OPP FUND LP	23,729,531.14	1.2333	30,509,135.76	6,779,604.62
TOTAL INVESTMENTS PRIVATE EQUITY		23,729,531.14		30,509,135.76	6,779,604.62
TOTAL INVESTMENT		23,729,531.14		30,509,135.76	6,779,604.62



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INVESTMENTS OTHER					
18,179,435.9900	GRESHAM COMMODITY FUND CL A1	18,179,435.99	1.0224	18,586,954.53	407,518.54
TOTAL INVESTMENTS OTHER		18,179,435.99		18,586,954.53	407,518.54
TOTAL INVESTMENT		18,179,435.99		18,586,954.53	407,518.54



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<u>INVESTMENTS CASH EQUIVALENTS</u>					
2,950,448.6700	FIDELITY INSTL MM PRIME 690	2,950,448.67	100.0000	2,950,448.67	0.00
TOTAL INVESTMENTS CASH EQUIVALENTS		2,950,448.67		2,950,448.67	0.00
<u>INVESTMENTS FIXED INCOME SECURITIES</u>					
240,000.0000	ALASKA ST HSG FIN CORP 5.000% 12/01/2027 DD 05/30/13	259,835.73	114.0400	273,696.00	13,860.27
775,000.0000	ARIZONA BRD OF RGTS UNIV ARIZO 5.000% 08/01/2029 DD 05/30/13	848,849.75	113.9230	882,903.25	34,053.50
800,000.0000	ARIZONA ST LOTTERY REVENUE 5.000% 07/01/2028 DD 06/15/10	851,089.81	109.3330	874,664.00	23,574.19
730,000.0000	ARIZONA ST TRANSPRTN BRD HIGHW 5.000% 07/01/2035 DD 01/29/13	788,827.26	111.9460	817,205.80	28,378.54
110,000.0000	CALIFORNIA ST 5.050% 12/01/2036 DD 04/01/05	110,536.43	100.7640	110,840.40	303.97
435,000.0000	CHICAGO IL TRANSIT AUTH SALES 5.250% 12/01/2029 DD 11/04/11	502,549.09	111.0690	483,150.15	19,398.94-
540,000.0000	CONNECTICUT ST HSG FIN AUTH HS 4.100% 11/15/2028 DD 10/30/13	540,000.00	106.1950	573,453.00	33,453.00
90,000.0000	DETROIT MI CITY SCH DIST 5.250% 05/01/2032 DD 08/17/05	94,808.56	113.6240	102,261.60	7,453.04



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55,000.0000	DETROIT MI CITY SCH DIST 5.636% 05/01/2016 DD 12/30/09	58,529.53	104.5120	57,481.60	1,047.93-
70,000.0000	DETROIT MI CITY SCH DIST 6.252% 05/01/2018 DD 12/30/09	77,208.55	106.9640	74,874.80	2,333.75-
1,650,854.8100	FNMA POOL #0AO4103 3.500% 06/01/2042 DD 06/01/12	1,679,712.51	102.2160	1,687,437.75	7,725.24
1,818,583.1000	FNMA POOL #0AO7284 3.500% 07/01/2042 DD 06/01/12	1,850,372.93	102.2270	1,859,082.95	8,710.02
1,281,944.6400	FNMA POOL #0AQ4086 4.000% 06/01/2043 DD 06/01/13	1,348,382.26	105.6120	1,353,887.37	5,505.11
1,267,417.9800	FNMA POOL #0AO9179 3.500% 07/01/2042 DD 06/01/12	1,285,221.29	102.2260	1,295,630.70	10,409.41
1,680,054.3300	FNMA POOL #0AO9180 3.500% 07/01/2042 DD 06/01/12	1,709,422.61	102.2220	1,717,385.14	7,962.53
1,276,714.5800	FNMA POOL #0AR4445 3.000% 03/01/2043 DD 03/01/13	1,238,057.31	98.3450	1,255,584.95	17,527.64
585,000.0000	FLORIDA ST HSG FIN CORP REVENUE 4.000% 07/01/2027 DD 12/23/13	585,000.00	105.2950	615,975.75	30,975.75
100,000.0000	HOUSTON TX 5.000% 03/01/2025 DD 05/22/12	111,585.44	116.7160	116,716.00	5,130.56
196,854.8500	ILLINOIS ST HSG DEV AUTH 3.875% 12/01/2043 DD 10/01/13	196,854.85	104.2110	205,144.41	8,289.56



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370,000.0000	LOS ANGELES CNTY CA MET TRANSP 5.000% 07/01/2024 DD 12/18/13	430,553.44	122.1630	452,003.10	21,449.66
375,000.0000	MAINE ST HSG AUTH MTGE REVENUE 2.700% 11/15/2023 DD 02/21/13	375,000.00	96.5690	362,133.75	12,866.25-
180,000.0000	MAINE ST HSG AUTH MTGE REVENUE 3.450% 11/15/2032 DD 02/21/13	178,491.56	97.7300	175,914.00	2,577.56-
180,000.0000	MAINE ST HSG AUTH MTGE REVENUE 4.000% 11/15/2028 DD 07/17/13	180,000.00	104.2730	187,691.40	7,691.40
455,000.0000	MAINE ST HSG AUTH MTGE REVENUE 4.950% 11/15/2028 DD 09/26/13	455,000.00	107.7420	490,226.10	35,226.10
550,000.0000	MASSACHUSETTS ST HSG FIN AGY 3.750% 12/01/2028 DD 03/21/13	550,000.00	97.8240	538,032.00	11,968.00-
180,000.0000	MET GOVT NASHVILLE & DAVIDSONC 5.000% 05/15/2027 DD 06/27/13	205,686.94	117.7090	211,876.20	6,189.26
125,000.0000	MICHIGAN ST 5.000% 12/01/2028 DD 07/01/14	146,608.75	117.9850	147,481.25	872.50
365,000.0000	MINNESOTA ST 5.000% 08/01/2025 DD 08/15/13	411,625.27	121.0500	441,832.50	30,207.23
900,000.0000	MINNESOTA ST HSG FIN AGY 4.875% 07/01/2037 DD 10/26/06	896,888.69	100.7990	907,191.00	10,302.31
80,000.0000	MINNESOTA ST RETMNT SYS BLDG R 4.000% 06/01/2023 DD 08/09/12	85,080.06	112.0900	89,672.00	4,591.94



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343,696.8500	MINNESOTA ST HSG FIN AGY HOME0 2.350% 03/01/2043 DD 02/28/13	343,696.85	94.8560	326,017.08	17,679.77-
347,654.3700	MINNESOTA ST HSG FIN AGY HOME0 3.000% 09/01/2043 DD 07/25/13	347,654.37	101.1770	351,746.26	4,091.89
1,600,000.0000	MINNESOTA ST HSG FIN AGY HOME0 3.000% 07/01/2044 DD 06/19/14	1,600,000.00	101.0040	1,616,064.00	16,064.00
250,000.0000	MINNESOTA ST HSG FIN AGY 2.550% 07/01/2022 DD 06/20/13	250,000.00	101.6010	254,002.50	4,002.50
150,000.0000	MINNESOTA ST HSG FIN AGY 3.200% 01/01/2025 DD 04/30/14	150,000.00	100.5710	150,856.50	856.50
550,000.0000	MISSOURI ST ENVRNMNTL IMPT & E 5.000% 07/01/2025 DD 11/26/13	634,310.12	121.2110	666,660.50	32,350.38
160,000.0000	MONTANA ST BRD OF HSG 3.350% 12/01/2025 DD 05/30/13	160,000.00	96.6410	154,625.60	5,374.40-
675,000.0000	MONTANA ST BRD OF HSG 3.550% 12/01/2033 DD 05/30/13	675,000.00	100.2150	676,451.25	1,451.25
120,000.0000	MONTANA ST BRD OF HSG 4.650% 12/01/2028 DD 09/26/13	120,000.00	108.2710	129,925.20	9,925.20
735,000.0000	NEBRASKA ST INVESTMENT FIN AUT 3.600% 03/01/2031 DD 05/30/13	735,000.00	98.0280	720,505.80	14,494.20-
125,000.0000	NEBRASKA ST INVESTMENT FIN AUT 3.650% 09/01/2024 DD 11/26/13	125,000.00	104.5190	130,648.75	5,648.75



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395,000.0000	NEW JERSEY ST HGR EDU ASSISTAN 3.625% 12/01/2025 DD 06/20/13	371,141.67	97.1950	383,920.25	12,778.58
550,000.0000	NEW JERSEY ST HGR EDU ASSISTAN 3.750% 12/01/2026 DD 06/20/13	540,341.30	97.6900	537,295.00	3,046.30-
805,000.0000	NEW MEXICO ST EDUCTNL ASSISTAN 3.875% 04/01/2034 DD 05/08/13	770,048.97	96.8370	779,537.85	9,488.88
550,000.0000	NEW YORK CITY NY MUNI WTR FINA 5.000% 06/15/2035 DD 06/27/13	598,601.07	112.0200	616,110.00	17,508.93
255,000.0000	NEW YORK ST ENVRNMNTL FACS COR 5.000% 06/15/2024 DD 05/31/12	291,408.00	119.7070	305,252.85	13,844.85
365,000.0000	NEW YORK ST HSG FIN AGY ST PER 5.000% 03/15/2034 DD 06/19/08	370,160.78	110.3420	402,748.30	32,587.52
305,000.0000	NEW YORK ST MTGE AGY REVENUE 3.150% 10/01/2027 DD 04/25/13	305,000.00	96.8530	295,401.65	9,598.35-
165,000.0000	NEW YORK ST THRUWAY AUTH PERSO 5.000% 03/15/2027 DD 09/06/12	184,721.57	115.7790	191,035.35	6,313.78
602,322.0000	OKLAHOMA ST HSG FIN AGY SF MTG 3.350% 09/01/2035 DD 10/30/13	602,322.00	97.1710	585,282.31	17,039.69-
620,000.0000	OMAHA NE 6.500% 12/01/2030 DD 12/01/00	835,742.95	140.7770	872,817.40	37,074.45
145,000.0000	OREGON ST DEPT OF ADMIN SVCS L 5.000% 04/01/2026 DD 04/16/13	158,775.77	118.8290	172,302.05	13,526.28



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<u>SHARES/ PAR VALUE</u>	<u>SECURITY DESCRIPTION</u>	<u>COST</u>	<u>PRICE</u>	<u>MARKET VALUE</u>	<u>UNREALIZED GAIN/LOSS</u>
705,000.0000	OREGON ST HSG & CMNTY SVCS DEP 3.500% 07/01/2028 DD 06/12/13	705,000.00	100.4020	707,834.10	2,834.10
180,000.0000	PACIFIC BELL TELEPHONE CO 7.125% 03/15/2026 DD 03/15/93	238,449.75	128.3570	231,042.60	7,407.15-
550,000.0000	PENNSYLVANIA ST HSG FIN AGY SF 3.350% 10/01/2023 DD 05/01/13	550,000.00	99.9180	549,549.00	451.00-
115,000.0000	PENNSYLVANIA ST HGR EDUCTNL FA 5.000% 05/15/2031 DD 03/24/10	127,090.82	107.4600	123,579.00	3,511.82-
100,000.0000	PORT OF SEATTLE WA 5.750% 12/01/2025 DD 02/23/11	119,737.34	123.7930	123,793.00	4,055.66
495,000.0000	PUERTO RICO PUBLIC FIN CORP 5.500% 08/01/2027 DD 01/16/02	572,209.71	125.4180	620,819.10	48,609.39
965,000.0000	PUERTO RICO PUBLIC FIN CORP 6.000% 08/01/2026 DD 01/16/02	1,201,922.35	129.9070	1,253,602.55	51,680.20
565,000.0000	REGL TRANSPRTN DIST CO SALES T 5.000% 11/01/2029 DD 05/16/13	639,706.33	121.9500	689,017.50	49,311.17
275,000.0000	REGL TRANSPRTN AUTH IL 5.750% 06/01/2034 DD 09/15/04	294,301.20	129.0410	354,862.75	60,561.55
1,355,000.0000	SLM STUDENT LOAN TRUST 200 4 B VAR RT 12/15/2023 DD 07/09/02	1,318,289.33	98.3220	1,332,263.10	13,973.77
1,130,000.0000	SLM STUDENT LOAN TRUST 200 3 B VAR RT 12/15/2024 DD 03/26/03	1,090,953.65	97.9120	1,106,405.60	15,451.95



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1,110,000.0000	SLM STUDENT LOAN TRUST 200 4 B VAR RT 01/27/2025 DD 05/05/04	1,060,632.39	96.8430	1,074,957.30	14,324.91
825,000.0000	SOUTH DAKOTA HSG DEV AUTH 3.550% 11/01/2033 DD 05/30/13	825,000.00	99.1120	817,674.00	7,326.00-
400,000.0000	SOUTH DAKOTA HSG DEV AUTH 4.100% 11/01/2028 DD 11/25/13	400,000.00	105.0790	420,316.00	20,316.00
150,000.0000	SOUTH DAKOTA HSG DEV AUTH 3.250% 05/01/2024 DD 04/30/14	150,000.00	102.0210	153,031.50	3,031.50
290,000.0000	TENNESSEE HSG DEV AGY RSDL FIN 3.000% 07/01/2025 DD 05/30/13	290,000.00	98.3420	285,191.80	4,808.20-
520,000.0000	TENNESSEE HSG DEV AGY RSDL FIN 4.000% 07/01/2043 DD 05/30/13	524,536.67	100.5020	522,610.40	1,926.27-
240,000.0000	TENNESSEE HSG DEV AGY RSDL FIN 3.125% 01/01/2026 DD 05/30/13	240,000.00	100.6330	241,519.20	1,519.20
3,941,256.0000	US TREAS-CPI INFLAT 2.000%001/15/2026 DD 01/15/06	5,085,487.23	117.8200	4,643,587.82	441,899.41-
2,870,608.0000	US TREAS-CPI INFLAT 2.500% 01/15/2029 DD 01/15/09	4,038,979.19	126.1720	3,621,903.53	417,075.66-
1,206,403.0000	US TREAS-CPI INFLAT 2.125% 02/15/2040 DD 02/15/10	1,787,770.36	127.2270	1,534,870.34	252,900.02-
1,468,684.0000	US TREAS-CPI INFLAT 0.750% 02/15/2042 DD 02/15/12	1,670,247.09	94.1330	1,382,516.31	287,730.78-



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220,000.0000	UNIV OF WASHINGTON WA UNIV REV 5.000% 07/01/2030 DD 09/05/13	231,285.24	116.1910	255,620.20	24,334.96
390,000.0000	VERMONT ST STUDENT ASSISTANCEC 3.900% 06/15/2022 DD 07/02/13	390,000.00	100.6060	392,363.40	2,363.40
815,000.0000	VIRGINIA ST HSG DEV AUTH CMWLT 3.875% 01/01/2038 DD 04/11/13	815,282.31	99.6170	811,878.55	3,403.76-
500,000.0000	VIRGINIA ST HSG DEV AUTH CMWLT 3.700% 10/01/2025 DD 10/30/13	500,000.00	104.6330	523,165.00	23,165.00
500,000.0000	WASHINGTON ST HSG FIN COMMISSI 3.300% 06/01/2024 DD 03/27/13	500,000.00	99.9350	499,675.00	325.00-
240,000.0000	WASHINGTON ST HSG FIN COMMISSI 4.500% 06/01/2028 DD 01/28/14	240,000.00	105.2960	252,710.40	12,710.40
90,000.0000	WHITE SETTLEMENT TX INDEP SCHD 0.000% 08/15/2036 DD 05/16/13	36,302.29	39.7460	35,771.40	530.89-
275,000.0000	WYOMING ST CMNTY DEV AUTH HSGR 3.150% 12/01/2022 DD 04/11/13	275,000.00	98.7700	271,617.50	3,382.50-
1,830,000.0000	IFL L UL CPURNSA P 2.865% 2033 MAY 02	0.00	0.0000	0.00	0.00
3,850,000.0000	3ML CAP Q/Q 3.50% CALL JAN 26 000.035 ED 010126	0.00	6.9846	268,909.00	268,909.00
5,300,000.0000	3ML CAP Q/Q 3.75% CALL JUL 29 000.0375 ED 070129	0.00	9.0462	479,453.00	479,453.00



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1,830,000.0000	IFL L UL CPURNSA INDEX P 2.775% 2033 JUN 07	0.00	0.0000	0.00	0.00
1,830,000.0000	IFL L UL CPURNSA INDEX P 2.7125% 2033 JUN 10	0.00	0.0000	0.00	0.00
1,830,000.0000	IFL L UL CPURNSA P 2.63% 2028 JUN 14	0.00	0.0000	0.00	0.00
1,830,000.0000	IRS_R US0003M P 6.75% 2038 JUN 19	59,109.00	27.4493	502,324.00	443,215.00
3,750,000.0000	IRS_R US0003M P 6.75% 2034 JAN 27	99,375.00	19.5206	732,023.00	632,648.00
TOTAL INVESTMENTS FIXED INCOME SECURITIES		54,297,371.29		55,497,092.32	1,199,721.03
TOTAL INVESTMENT		57,247,819.96		58,447,540.99	1,199,721.03
<u>SHORT FIXED INCOME SECURITIES</u>					
1,830,000.0000-	IFL S UL CPURNSA P 2.865% 2033 MAY 02	0.00	3.8571	70,585.00-	70,585.00-
1,830,000.0000-	IFL S UL CPURNSA INDEX P 2.775% 2033 JUN 07	0.00	1.7225	31,523.00-	31,523.00-
1,830,000.0000-	IFL S UL CPURNSA INDEX P 2.7125% 2033 JUN 10	0.00	0.5008	9,165.00-	9,165.00-
1,830,000.0000-	IFL S UL CPURNSA P 2.63% 2028 JUN 14	0.00	0.1573	2,880.00-	2,880.00-



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1,830,000.0000-	IRS R US0003M P 6.75% 2038 JUN 19	0.00	25.5797	468,110.00-	468,110.00-
3,750,000.0000-	IRS R US0003M P 6.75% 2034 JAN 29	0.00	17.7924	667,215.00-	667,215.00-
TOTAL SHORT FIXED INCOME SECURITIES		0.00		1,249,478.00-	1,249,478.00-
<u>WRITTEN OPTIONS FIXED INCOME SECURITIES</u>					
3,850,000.0000-	CPI CAP YOY 3.255% PUT JAN 26 000.03255 ED 010126	0.00	4.4727	172,199.00-	172,199.00-
5,300,000.0000-	CPI CAP YOY 3.41% PUT JUL 29 000.0341 ED 070129	0.00	5.9994	317,973.00-	317,973.00-
1,830,000.0000-	INF CAP UL CPI 3.75% 12/01/26 PUT DEC 26 003.750 ED 12/01/26	101,199.00-	3.9468	72,227.00-	28,972.00
TOTAL WRITTEN OPTIONS FIXED INCOME SECURITIES		101,199.00-		562,399.00-	461,200.00-
TOTAL SHORT INVESTMENT		101,199.00-		1,811,877.00-	1,710,678.00-
TOTAL NET INVESTMENT		57,146,620.96		56,635,663.99	510,956.97-



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INVESTMENTS ALTERNATIVE INVESTMENTS					
30,168,259.0000	TITAN FUND LP	30,168,259.00	1.0230	30,862,203.00	693,944.00
TOTAL INVESTMENTS ALTERNATIVE INVESTMENTS		30,168,259.00		30,862,203.00	693,944.00
TOTAL INVESTMENT		30,168,259.00		30,862,203.00	693,944.00



BNY MELLON

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INVESTMENTS ALTERNATIVE INVESTMENTS					
11,028.7500	MAGNITUDE US PARTNERS	11,028,750.28	1,052.5744	11,608,581.00	579,830.72
9,361.0700	MAGNITUDE US PARTNERS (SERIES Y)	9,680,651.12	1,052.9495	9,856,734.00	176,082.88
9,446.8900	MAGNITUDE US PARTNERS (SERIES X)	9,711,087.39	1,056.0559	9,976,444.00	265,356.61
114.1700	MAGNITUDE US PARTNERS 041414 SERIES Y	114,168.23	1,009.8624	115,296.00	1,127.77
TOTAL INVESTMENTS ALTERNATIVE INVESTMENTS		30,534,657.02		31,557,055.00	1,022,397.98
TOTAL INVESTMENT		30,534,657.02		31,557,055.00	1,022,397.98



BNY MELLON

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<u>INVESTMENTS UNIT OF PARTICIPATION</u>					
29,902,481.9620	PRAIRIE #1 QUALIFIED MTU	289,896,359.51	11.5929	346,656,632.65	56,760,273.14
TOTAL INVESTMENTS UNIT OF PARTICIPATION		289,896,359.51		346,656,632.65	56,760,273.14
TOTAL INVESTMENT		289,896,359.51		346,656,632.65	56,760,273.14



BNY MELLON

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<u>INVESTMENTS CASH EQUIVALENTS</u>					
1,743,373.1300	FIDELITY INSTL MM PRIME 690	1,743,373.13	100.0000	1,743,373.13	0.00
TOTAL INVESTMENTS CASH EQUIVALENTS		1,743,373.13		1,743,373.13	0.00
TOTAL INVESTMENT		1,743,373.13		1,743,373.13	0.00



BNY MELLON

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<u>INVESTMENTS CASH EQUIVALENTS</u>					
48.6000	BNY MELLON CASH RESERVE 0.010% 12/31/2049 DD 06/26/97	48.60	100.0000	48.60	0.00
265,819.7700	FIDELITY INSTL MM PRIME 690	265,819.77	100.0000	265,819.77	0.00
TOTAL INVESTMENTS CASH EQUIVALENTS		265,868.37		265,868.37	0.00
<u>INVESTMENTS EQUITY</u>					
273.0000	ACTAVIS PLC	33,982.55	223.0500	60,892.65	26,910.10
401.0000	AIRCASTLE LTD SHS	4,896.21	17.7700	7,125.77	2,229.56
726.0000	ALLEGION PLC	15,000.95	56.6800	41,149.68	26,148.73
978.0000	ALKERMES PLC	17,198.90	50.3300	49,222.74	32,023.84
985.0000	AMDOCS LTD COM	29,981.22	46.3300	45,635.05	15,653.83
1,854.0000	AON CORP	90,864.54	90.0900	167,026.86	76,162.32
1,406.0000	ARCH CAPITAL GROUP LTD SHS	35,327.19	57.4400	80,760.64	45,433.45
189.0000	ARGO GROUP INTERNATIONAL HOLDINGS LTD COM	4,881.35	51.1100	9,659.79	4,778.44
286.0000	ASPEN INSURANCE HOLDINGS LIMITED SHS	7,107.10	45.4200	12,990.12	5,883.02



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1,919.0000	ASSURED GUARANTY LTD SHS	26,139.79	24.5000	47,015.50	20,875.71
770.0000	AXIS CAPITAL HLDGS LTD SHS	23,669.80	44.2800	34,095.60	10,425.80
190.0000	ENERGY XXI BERMUDA LTD	4,007.10	23.6300	4,489.70	482.60
3,649.0000	ACCENTURE PLC	155,839.86	80.8400	294,985.16	139,145.30
936.0000	BUNGE LIMITED COM	58,060.08	75.6400	70,799.04	12,738.96
551.0000	CONSOLIDATED WATER CO LTD	5,052.67	11.7700	6,485.27	1,432.60
3,159.0000	COVIDIEN PLC	123,345.22	90.1800	284,878.62	161,533.40
1,498.0000	DELPHI AUTOMOTIVE PLC	52,311.21	68.7400	102,972.52	50,661.31
2,575.0000	EATON CORP PLC	134,143.72	77.1800	198,738.50	64,594.78
696.0000	ENDURANCE SPECIALTY HLDGS LTD SHS	25,598.88	51.5900	35,906.64	10,307.76
653.0000	ENDO INTERNATIONAL PLC	20,087.07	70.0200	45,723.06	25,635.99
50.0000	ENSTAR GROUP LIMITED SHS	5,024.00	150.7300	7,536.50	2,512.50
268.0000	EVEREST RE GROUP INC COM	24,972.24	160.4900	43,011.32	18,039.08
2,546.0000	FRUIT OF THE LOOM INC CL A	21,603.27	8.4851	21,603.27	0.00
183.0000	HELEN OF TROY LTD NEW	5,927.37	60.6300	11,095.29	5,167.92
653.0000	HERBALIFE LTD	24,980.22	64.5400	42,144.62	17,164.40



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2,180.0000	INGERSOLL-RAND PUBLIC LIMITED COMPANY	59,408.52	62.5100	136,271.80	76,863.28
938.0000	WEATHERFORD INTL PLC ORD SHS	13,492.38	23.0000	21,574.00	8,081.62
3,037.0000	INVESCO LTD	75,767.65	37.7500	114,646.75	38,879.10
457.0000	JAZZ PHARMACEUTICALS PLC	23,133.48	147.0100	67,183.57	44,050.09
306.0000	LIBERTY GLOBAL PLC	4,556.03	44.2200	13,531.32	8,975.29
395.0000	LIBERTY GLOBAL PLC SHS CL C	6,915.01	42.3100	16,712.45	9,797.44
394.0000	MALLINCKRODT PLC	12,091.02	80.0200	31,527.88	19,436.86
2,368.0000	MARVELL TECHNOLOGY GROUP LTD SHS	23,621.38	14.3300	33,933.44	10,312.06
1,175.0000	MICHAEL KORS HOLDINGS LTD	63,090.48	88.6500	104,163.75	41,073.27
371.0000	MONTPELIER RE HOLDINGS LTD CDT SHS	6,396.04	31.9500	11,853.45	5,457.41
1,215.0000	NABORS INDUSTRIES LTD SHS	19,331.46	29.3700	35,684.55	16,353.09
1,541.0000	NORDIC AMER TANKER SHIPPING	12,882.76	9.5300	14,685.73	1,802.97
1,750.0000	ORIENT EXPRESS HOTELS LTD CL A SHS	14,284.86	14.5400	25,445.00	11,160.14
248.0000	PARTNERRE HLDGS LTD BERMUDA COM	16,369.58	109.2100	27,084.08	10,714.50



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1,402.0000	PENTAIR PLC	52,690.15	72.1200	101,112.24	48,422.09
152.0000	PLATINUM UNDERWRITERS HLDGS LTD SHS	4,892.88	64.8500	9,857.20	4,964.32
71.0000	RENAISSANCE RE HOLDINGS LTD	4,891.19	107.0000	7,597.00	2,705.81
1,284.0000	SHIP FINANCE INTL LTD SHS	13,969.92	18.5900	23,869.56	9,899.64
809.0000	SIGNET JEWELERS LTD	25,968.90	110.5900	89,467.31	63,498.41
117.0000	THERAVANCE BIOPHARMA INC	2,294.37	31.8800	3,729.96	1,435.59
294.0000	VALIDUS HOLDINGS LTD COM SHS	8,822.94	38.2400	11,242.56	2,419.62
5,494.0000	VANTAGE DRILLING COMPANY ORD SHS	10,273.78	1.9200	10,548.48	274.70
217.0000	GOLAR LNG LIMITED SHS	6,989.57	60.1000	13,041.70	6,052.13
12.0000	WHITE MOUNTAINS INS GRP INC	4,836.12	608.4400	7,301.28	2,465.16
2,085.0000	XL GROUP PLC	44,029.87	32.7300	68,242.05	24,212.18
2,038.0000	ACE LIMITED SHS	116,644.45	103.7000	211,340.60	94,696.15
472.0000	GARMIN LTD	14,820.80	60.9000	28,744.80	13,924.00
875.0000	TYCO INTERNATIONAL LTD SHS	16,096.31	45.6000	39,900.00	23,803.69
77.0000	STRATASYS LTD	5,299.91	113.6300	8,749.51	3,449.60
209.0000	ASML HLDG N V N Y REGISTRY SHS NEW 2012	8,663.83	93.2700	19,493.43	10,829.60



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1,599.0000	LYONDELLBASELL INDUSTRIES NV	74,313.01	97.6500	156,142.35	81,829.34
758.0000	NIELSEN N V	24,234.23	48.4100	36,694.78	12,460.55
150.0000	VISTAPRINT NV	5,083.50	40.4600	6,069.00	985.50
806.0000	BANCO LATINOAMERICANO DE COMERCIO EXTERIOR	13,677.82	29.6700	23,914.02	10,236.20
273.0000	COPA HOLDINGS S A CL A	20,491.32	142.5700	38,921.61	18,430.29
922.0000	ROYAL CARIBBEAN CRUISES LTD	24,361.82	55.6000	51,263.20	26,901.38
1,416.0000	AVAGO TECHNOLOGIES LTD	50,260.44	72.0700	102,051.12	51,790.68
1,000.0000	SCORPIO TANKERS INC	4,960.00	10.1700	10,170.00	5,210.00
159.0000	TEEKAY CORPORATION COM	4,824.06	62.2500	9,897.75	5,073.69
1,748.0000	TEEKAY TANKERS LTD CLASS A	5,611.08	4.2900	7,498.92	1,887.84
316.0000	ABM INDUSTRIES INC	7,223.76	26.9800	8,525.68	1,301.92
1,244.0000	ADT CORP/THE	30,356.17	34.9400	43,465.36	13,109.19
2,963.0000	AFLAC INC	136,164.96	62.2500	184,446.75	48,281.79
589.0000	AGCO CORP	26,884.93	56.2200	33,113.58	6,228.65
830.0000	AGL RESOURCES INC	32,721.92	55.0300	45,674.90	12,952.98
1,053.0000	AH BELO CORP	5,201.61	11.8500	12,478.05	7,276.44



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3,006.0000	AES CORP/THE	38,172.61	15.5500	46,743.30	8,570.69
1,438.0000	AK STEEL HOLDING CORP	7,995.28	7.9600	11,446.48	3,451.20
299.0000	AMAG PHARMACEUTICALS INC	5,142.80	20.7200	6,195.28	1,052.48
137.0000	AOL INC	5,115.58	39.7900	5,451.23	335.65
30,811.0000	AT&T INC	988,297.41	35.3600	1,089,476.96	101,179.55
841.0000	AVX CORP	10,024.72	13.2800	11,168.48	1,143.76
477.0000	AARON'S INC	12,883.77	35.6400	17,000.28	4,116.51
8,027.0000	ABBOTT LABORATORIES	188,027.06	40.9000	328,304.30	140,277.24
9,470.0000	ABBVIE INC	258,595.02	56.4400	534,486.80	275,891.78
1,520.0000	ABRAXAS PETROLEUM CORP	4,924.80	6.2600	9,515.20	4,590.40
244.0000	ACADIA REALTY TRUST	4,926.36	28.0900	6,853.96	1,927.60
2,191.0000	ACCURIDE CORP	6,923.56	4.8900	10,713.99	3,790.43
164.0000	ACI WORLDWIDE INC	5,180.76	55.8300	9,156.12	3,975.36
2,302.0000	ACTIVISION BLIZZARD INC	30,588.24	22.3000	51,334.60	20,746.36
409.0000	ACTUANT CORP	10,548.11	34.5700	14,139.13	3,591.02
258.0000	ACUITY BRANDS INC	14,107.44	138.2500	35,668.50	21,561.06
1,265.0000	ACXIOM CORP	16,031.23	21.6900	27,437.85	11,406.62



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2,878.0000	ADOBE SYSTEMS INC	109,635.39	72.3600	208,252.08	98,616.69
542.0000	ADVANCE AUTO PARTS INC	33,554.48	134.9200	73,126.64	39,572.16
714.0000	AECOM TECHNOLOGY CORP	14,879.76	32.2000	22,990.80	8,111.04
1,592.0000	AEGERION PHARMACEUTICALS INC	50,206.82	32.0900	51,087.28	880.46
592.0000	AEGION CORP	10,290.00	23.2700	13,775.84	3,485.84
2,259.0000	AETNA INC	88,610.40	81.0800	183,159.72	94,549.32
312.0000	AFFILIATED MANAGERS GROUP INC	29,908.32	205.4000	64,084.80	34,176.48
2,378.0000	AGILENT TECHNOLOGIES INC	74,720.87	57.4400	136,592.32	61,871.45
333.0000	AGREE REALTY CORP	9,813.51	30.2300	10,066.59	253.08
195.0000	AIR LEASE CORP	4,655.27	38.5800	7,523.10	2,867.83
1,385.0000	AIR PRODUCTS & CHEMICALS INC	93,543.92	128.6200	178,138.70	84,594.78
378.0000	AIRGAS INC	19,216.05	108.9100	41,167.98	21,951.93
1,099.0000	AKAMAI TECHNOLOGIES INC	36,268.16	61.0600	67,104.94	30,836.78
146.0000	ALAMO GROUP INC	4,950.86	54.0900	7,897.14	2,946.28
428.0000	ALASKA AIR GROUP INC	14,338.00	95.0500	40,681.40	26,343.40
197.0000	ALBANY INTERNATIONAL CORP	4,873.78	37.9600	7,478.12	2,604.34
5,205.0000	ALCOA INC	45,966.22	14.8900	77,502.45	31,536.23



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392.0000	ALERE INC	10,043.04	37.4200	14,668.64	4,625.60
571.0000	ALEXANDER & BALDWIN INC	8,493.22	41.4500	23,667.95	15,174.73
47.0000	ALEXANDER'S INC	15,356.77	369.4700	17,365.09	2,008.32
357.0000	ALEXANDRIA REAL ESTATE EQUITIE	25,139.94	77.6400	27,717.48	2,577.54
1,002.0000	ALEXION PHARMACEUTICALS INC	79,710.08	156.2500	156,562.50	76,852.42
365.0000	ALIGN TECHNOLOGY INC	8,066.50	56.0400	20,454.60	12,388.10
98.0000	ALLEGHANY CORP	28,633.04	438.1200	42,935.76	14,302.72
318.0000	ALLEGHENY TECHNOLOGIES INC	9,822.14	45.1000	14,341.80	4,519.66
107.0000	ALLEGIANTRAVEL CO	4,872.78	117.7700	12,601.39	7,728.61
1,924.0000	ALLERGAN INC/UNITED STATES	109,226.54	169.2200	325,579.28	216,352.74
107.0000	ALLETE INC	5,077.15	51.3500	5,494.45	417.30
233.0000	ALLIANCE DATA SYSTEMS CORP	37,799.01	281.2500	65,531.25	27,732.24
670.0000	ALLIANT ENERGY CORP	30,649.35	60.8600	40,776.20	10,126.85
78.0000	ALLIANT TECHSYSTEMS INC	5,066.88	133.9200	10,445.76	5,378.88
393.0000	ALLSCRIPTS HEALTHCARE SOLUTION	4,943.94	16.0500	6,307.65	1,363.71
2,403.0000	ALLSTATE CORP/THE	92,618.53	58.7200	141,104.16	48,485.63
354.0000	ALMOST FAMILY INC	5,200.26	22.0800	7,816.32	2,616.06



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341.0000	ALNYLAM PHARMACEUTICALS INC	10,315.25	63.1700	21,540.97	11,225.72
587.0000	ALON USA ENERGY INC	5,165.60	12.4400	7,302.28	2,136.68
16,486.0000	ALPHA NATURAL RESOURCES INC	61,492.78	3.7100	61,163.06	329.72-
1,244.0000	ALTERA CORP	23,901.42	34.7600	43,241.44	19,340.02
11,119.0000	ALTRIA GROUP INC	189,780.71	41.9400	466,330.86	276,550.15
1,596.0000	AMAZON.COM INC	60,333.70	324.7800	518,348.88	458,015.18
53.0000	AMERCO	5,074.22	290.7600	15,410.28	10,336.06
1,085.0000	AMEREN CORP	33,801.46	40.8800	44,354.80	10,553.34
227.0000	AMERICAN ASSETS TRUST INC	5,077.99	34.5500	7,842.85	2,764.86
1,028.0000	AMERICAN AXLE & MANUFACTURING	10,248.04	18.8900	19,418.92	9,170.88
405.0000	AMERICAN CAMPUS COMMUNITIES IN	14,021.10	38.2400	15,487.20	1,466.10
458.0000	AMERICAN CAPITAL AGENCY CORP	9,361.52	23.4100	10,721.78	1,360.26
2,111.0000	AMERICAN CAPITAL LTD	19,315.65	15.2900	32,277.19	12,961.54
2,731.0000	AMERICAN ELECTRIC POWER CO INC	100,537.67	55.7700	152,307.87	51,770.20
401.0000	AMERICAN EQUITY INVESTMENT LIF	4,944.33	24.6000	9,864.60	4,920.27
5,686.0000	AMERICAN EXPRESS CO	316,565.33	94.8700	539,430.82	222,865.49
144.0000	AMERICAN FINANCIAL GROUP INC/O	4,982.40	59.5600	8,576.64	3,594.24



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7,453.0000	AMERICAN INTERNATIONAL GROUP I	263,756.61	54.5800	406,784.74	143,028.13
164.0000	AMERICAN SCIENCE & ENGINEERING	9,994.16	69.5900	11,412.76	1,418.60
604.0000	AMERICAN SOFTWARE INC/GEORGIA	5,031.32	9.8800	5,967.52	936.20
2,289.0000	AMERICAN TOWER CORP	101,647.40	89.9800	205,964.22	104,316.82
1,135.0000	AMERICAN WATER WORKS CO INC	28,976.55	49.4500	56,125.75	27,149.20
1,131.0000	AMERISOURCEBERGEN CORP	37,162.60	72.6600	82,178.46	45,015.86
1,604.0000	AMERIPRISE FINANCIAL INC	74,903.11	120.0000	192,480.00	117,576.89
572.0000	AMERIS BANCORP	5,119.40	21.5600	12,332.32	7,212.92
1,435.0000	AMETEK INC	40,687.03	52.2800	75,021.80	34,334.77
4,378.0000	AMGEN INC	242,099.70	118.3700	518,223.86	276,124.16
956.0000	AMPHENOL CORP	31,252.02	96.3400	92,101.04	60,849.02
194.0000	AMSURG CORP	4,974.16	45.5700	8,840.58	3,866.42
138.0000	AMTRUST FINANCIAL SERVICES INC	2,515.93	41.8100	5,769.78	3,253.85
3,389.0000	AMYRIS INC	9,989.42	3.7300	12,640.97	2,651.55
3,028.0000	ANADARKO PETROLEUM CORP	134,122.08	109.4700	331,475.16	197,353.08
1,721.0000	ANALOG DEVICES INC	66,966.30	54.0700	93,054.47	26,088.17
187.0000	ANDERSONS INC/THE	4,965.47	51.5800	9,645.46	4,679.99



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4,896.0000	ANGIE'S LIST INC	58,547.84	11.9400	58,458.24	89.60-
173.0000	ANIXTER INTERNATIONAL INC	10,578.95	100.0700	17,312.11	6,733.16
522.0000	ANN INC	14,871.24	41.1400	21,475.08	6,603.84
547.0000	ANSYS INC	29,023.82	75.8200	41,473.54	12,449.72
1,783.0000	APACHE CORP	118,499.79	100.6200	179,405.46	60,905.67
759.0000	APARTMENT INVESTMENT & MANAGEM	18,982.59	32.2700	24,492.93	5,510.34
3,521.0000	APOLLO COMMERCIAL REAL ESTATE	57,668.55	16.4900	58,061.29	392.74
32,608.0000	APPLE INC	378,986.85	92.9300	3,030,261.44	2,651,274.59
146.0000	APPLIED INDUSTRIAL TECHNOLOGIE	4,991.74	50.7300	7,406.58	2,414.84
604.0000	APPLIED MICRO CIRCUITS CORP	5,176.28	10.8100	6,529.24	1,352.96
5,584.0000	APPLIED MATERIALS INC	74,308.91	22.5500	125,919.20	51,610.29
384.0000	APTARGROUP INC	20,115.83	67.0100	25,731.84	5,616.01
1,028.0000	AQUA AMERICA INC	17,632.26	26.2200	26,954.16	9,321.90
3,796.0000	ARCHER-DANIELS-MIDLAND CO	118,482.65	44.1100	167,441.56	48,958.91
1,681.0000	ARENA PHARMACEUTICALS INC	9,800.23	5.8600	9,850.66	50.43
1,015.0000	ARES CAPITAL CORP	14,849.45	17.8600	18,127.90	3,278.45
7,350.0000	ARIAD PHARMACEUTICALS INC	46,893.00	6.3700	46,819.50	73.50-



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10.0000	ARMSTRONG WORLD INDUSTRIES INC	440.10	57.4300	574.30	134.20
737.0000	ARRIS GROUP INC	8,077.52	32.5300	23,974.61	15,897.09
789.0000	ARROW ELECTRONICS INC	26,447.28	60.4100	47,663.49	21,216.21
222.0000	ARROW FINANCIAL CORP	5,015.45	25.9400	5,758.68	743.23
224.0000	ARTESIAN RESOURCES CORP	5,028.80	22.4800	5,035.52	6.72
294.0000	ASBURY AUTOMOTIVE GROUP INC	5,092.08	68.7400	20,209.56	15,117.48
748.0000	ASCENA RETAIL GROUP INC	12,428.02	17.1000	12,790.80	362.78
917.0000	ASHFORD HOSPITALITY TRUST INC	10,563.84	11.5400	10,582.18	18.34
582.0000	ASHLAND INC	32,050.74	108.7400	63,286.68	31,235.94
504.0000	ASPEN TECHNOLOGY INC	7,791.84	46.4000	23,385.60	15,593.76
2,277.0000	ASSOCIATED BANC-CORP	24,295.59	18.0800	41,168.16	16,872.57
2,992.0000	ASSOCIATED ESTATES REALTY CORP	54,125.28	18.0200	53,915.84	209.44-
342.0000	ASSURANT INC	10,105.19	65.5500	22,418.10	12,312.91
142.0000	ASTEC INDUSTRIES INC	4,979.94	43.8800	6,230.96	1,251.02
208.0000	ATHENAHEALTH INC	8,540.48	125.1300	26,027.04	17,486.56
5,454.0000	ATLANTIC POWER CORP	16,580.71	4.1000	22,361.40	5,780.69
767.0000	ATMEL CORP	4,839.77	9.3700	7,186.79	2,347.02



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538.0000	ATMOS ENERGY CORP	17,382.78	53.4000	28,729.20	11,346.42
14.0000	ATRION CORP	3,289.44	326.0000	4,564.00	1,274.56
244.0000	ATWOOD OCEANICS INC	10,183.78	52.4800	12,805.12	2,621.34
1,563.0000	AUTODESK INC	54,016.50	56.3800	88,121.94	34,105.44
364.0000	AUTOLIV INC	19,003.99	106.5800	38,795.12	19,791.13
2,896.0000	AUTOMATIC DATA PROCESSING INC	125,001.33	79.2800	229,594.88	104,593.55
529.0000	AUTONATION INC	11,207.50	59.6800	31,570.72	20,363.22
76.0000	AUTOZONE INC	24,203.44	536.2400	40,754.24	16,550.80
2,883.0000	AUXILIUM PHARMACEUTICALS INC	60,777.85	20.0600	57,832.98	2,944.87-
660.0000	AVALONBAY COMMUNITIES INC	83,875.51	142.1900	93,845.40	9,969.89
640.0000	AVERY DENNISON CORP	18,284.80	51.2500	32,800.00	14,515.20
708.0000	AVIS BUDGET GROUP INC	15,452.38	59.6900	42,260.52	26,808.14
365.0000	AVISTA CORP	9,993.70	33.5200	12,234.80	2,241.10
647.0000	AVNET INC	22,749.55	44.3100	28,668.57	5,919.02
167.0000	AXIALL CORP	3,976.27	47.2700	7,894.09	3,917.82
3,242.0000	BB&T CORP	97,173.05	39.4300	127,832.06	30,659.01
88.0000	B&G FOODS INC	1,826.88	32.6900	2,876.72	1,049.84



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3,137.0000	BGC PARTNERS INC	10,728.54	7.4400	23,339.28	12,610.74
192.0000	BOK FINANCIAL CORP	10,043.52	66.6000	12,787.20	2,743.68
630.0000	BABCOCK & WILCOX CO/THE	16,288.71	32.4600	20,449.80	4,161.09
552.0000	BAKER HUGHES INC	24,512.64	74.4500	41,096.40	16,583.76
122.0000	BALCHEM CORP	5,055.68	53.5600	6,534.32	1,478.64
852.0000	BALL CORP	38,305.92	62.6800	53,403.36	15,097.44
494.0000	BALLY TECHNOLOGIES INC	20,904.89	65.7200	32,465.68	11,560.79
132.0000	BANCFIRST CORP	5,043.72	61.9000	8,170.80	3,127.08
42,832.0000	BANK OF AMERICA CORP	521,325.27	15.3700	658,327.84	137,002.57
324.0000	BANK OF HAWAII CORP	14,878.08	58.6900	19,015.56	4,137.48
276.0000	BANK OF MONTREAL	14,770.29	73.5900	20,310.84	5,540.55
1,382.0000	BANK MUTUAL CORP	4,906.10	5.8000	8,015.60	3,109.50
42.0000	BANK OF THE OZARKS INC	527.10	33.4500	1,404.90	877.80
2,798.0000	BANK OF NEW YORK MELLON CORP/T	75,633.12	37.4800	104,869.04	29,235.92
769.0000	CR BARD INC	57,748.45	143.0100	109,974.69	52,226.24
271.0000	BARNES & NOBLE INC	4,680.17	22.7900	6,176.09	1,495.92
209.0000	BARNES GROUP INC	4,903.14	38.5400	8,054.86	3,151.72



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492.0000	BASIC ENERGY SERVICES INC	4,683.84	29.2200	14,376.24	9,692.40
3,406.0000	BAXTER INTERNATIONAL INC	154,208.35	72.3000	246,253.80	92,045.45
1,335.0000	BBCN BANCORP INC	10,325.32	15.9500	21,293.25	10,967.93
978.0000	B/E AEROSPACE INC	29,682.30	92.4900	90,455.22	60,772.92
274.0000	BEACON ROOFING SUPPLY INC	6,088.28	33.1200	9,074.88	2,986.60
585.0000	BEAZER HOMES USA INC	10,032.75	20.9800	12,273.30	2,240.55
1,431.0000	BECTON DICKINSON AND CO	100,125.21	118.3000	169,287.30	69,162.09
1,568.0000	BED BATH & BEYOND INC	60,603.82	57.3800	89,971.84	29,368.02
282.0000	BELDEN INC	9,145.26	78.1600	22,041.12	12,895.86
872.0000	BEMIS CO INC	28,838.69	40.6600	35,455.52	6,616.83
703.0000	BENCHMARK ELECTRONICS INC	10,258.48	25.4800	17,912.44	7,653.96
614.0000	BENEFICIAL MUTUAL BANCORP INC	5,004.10	13.5600	8,325.84	3,321.74
782.0000	WR BERKLEY CORP	21,364.24	46.3100	36,214.42	14,850.18
8,979.0000	BERKSHIRE HATHAWAY INC	727,307.89	126.5600	1,136,382.24	409,074.35
233.0000	BERKSHIRE HILLS BANCORP INC	5,063.09	23.2200	5,410.26	347.17
954.0000	BERRY PLASTICS GROUP INC	15,006.42	25.8000	24,613.20	9,606.78
1,450.0000	BEST BUY CO INC	17,574.00	31.0100	44,964.50	27,390.50



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517.0000	BIG LOTS INC	10,407.37	45.7000	23,626.90	13,219.53
1,231.0000	BIOMARIN PHARMACEUTICAL INC	30,159.50	62.2100	76,580.51	46,421.01
1,160.0000	BIOGEN IDEC INC	100,771.15	315.3100	365,759.60	264,988.45
781.0000	BIOMED REALTY TRUST INC	14,643.75	21.8300	17,049.23	2,405.48
166.0000	BLACK HILLS CORP	4,968.38	61.3900	10,190.74	5,222.36
188.0000	BLACKBAUD INC	4,998.92	35.7400	6,719.12	1,720.20
229.0000	BLACKHAWK NETWORK HOLDINGS INC	5,415.84	26.8500	6,148.65	732.81
776.0000	BLACKROCK INC	152,754.30	319.6000	248,009.60	95,255.30
1,502.0000	H&R BLOCK INC	22,412.96	33.5200	50,347.04	27,934.08
846.0000	BLOOMIN' BRANDS INC	13,375.26	22.4300	18,975.78	5,600.52
4,191.0000	BOEING CO/THE	329,853.02	127.2300	533,220.93	203,367.91
378.0000	BOLT TECHNOLOGY CORP	5,749.38	18.3500	6,936.30	1,186.92
1,636.0000	BORGWARNER INC	59,970.06	65.1900	106,650.84	46,680.78
58.0000	BOSTON BEER CO INC	5,150.40	223.5200	12,964.16	7,813.76
772.0000	BOSTON PRIVATE FINANCIAL HOLDI	4,701.48	13.4400	10,375.68	5,674.20
904.0000	BOSTON PROPERTIES INC	92,726.17	118.1800	106,834.72	14,108.55
7,380.0000	BOSTON SCIENTIFIC CORP	53,608.43	12.7700	94,242.60	40,634.17



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216.0000	BOTTOMLINE TECHNOLOGIES INC	5,080.32	29.9200	6,462.72	1,382.40
1,128.0000	BOYD GAMING CORP	7,185.36	12.1300	13,682.64	6,497.28
2,159.0000	BRANDYWINE REALTY TRUST	21,629.15	15.6000	33,680.40	12,051.25
711.0000	BRINKER INTERNATIONAL INC	14,994.99	48.6500	34,590.15	19,595.16
9,847.0000	BRISTOL-MYERS SQUIBB CO	252,007.58	48.5100	477,677.97	225,670.39
197.0000	BRISTOW GROUP INC	10,050.23	80.6200	15,882.14	5,831.91
685.0000	BROADRIDGE FINANCIAL SOLUTIONS	14,727.50	41.6400	28,523.40	13,795.90
3,818.0000	BROCADE COMMUNICATIONS SYSTEMS	20,708.78	9.2000	35,125.60	14,416.82
402.0000	BROOKDALE SENIOR LIVING INC	8,450.04	33.3400	13,402.68	4,952.64
548.0000	BROOKLINE BANCORP INC	5,025.16	9.3700	5,134.76	109.60
691.0000	BROWN & BROWN INC	17,406.29	30.7100	21,220.61	3,814.32
720.0000	BROWN-FORMAN CORP	28,819.08	94.1700	67,802.40	38,983.32
488.0000	BROWN SHOE CO INC	5,016.64	28.6100	13,961.68	8,945.04
50.0000	BRUNOS INC NEW	500.00	10.0000	500.00	0.00
903.0000	BRUNSWICK CORP/DE	20,341.83	42.1300	38,043.39	17,701.56
248.0000	BRYN MAWR BANK CORP	4,915.36	29.1200	7,221.76	2,306.40
121.0000	BUCKLE INC/THE	5,028.76	44.3600	5,367.56	338.80



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272.0000	BUFFALO WILD WINGS INC	18,822.40	165.7100	45,073.12	26,250.72
214.0000	C&J ENERGY SERVICES INC	4,857.80	33.7800	7,228.92	2,371.12
1,542.0000	CBL & ASSOCIATES PROPERTIES IN	25,641.16	19.0000	29,298.00	3,656.84
3,608.0000	CBS CORP	101,666.19	62.1400	224,201.12	122,534.93
314.0000	CBOE HOLDINGS INC	7,570.54	49.2100	15,451.94	7,881.40
1,423.0000	CBRE GROUP INC	32,425.28	32.0400	45,592.92	13,167.64
390.0000	CF INDUSTRIES HOLDINGS INC	69,336.31	240.5300	93,806.70	24,470.39
1,823.0000	CIGNA CORPORATION COM	70,060.17	91.9700	167,661.31	97,601.14
1,491.0000	CIT GROUP INC	52,794.96	45.7600	68,228.16	15,433.20
1,756.0000	CME GROUP INC	103,861.04	70.9500	124,588.20	20,727.16
1,589.0000	CMS ENERGY CORP	30,429.35	31.1500	49,497.35	19,068.00
209.0000	CSS INDUSTRIES INC	5,032.72	26.3700	5,511.33	478.61
556.0000	CNA FINANCIAL CORP	15,050.92	40.4200	22,473.52	7,422.60
2,691.0000	CNO FINANCIAL GROUP INC	17,478.63	17.8000	47,899.80	30,421.17
86.0000	CSR PLC ADR	1,262.45	40.4700	3,480.42	2,217.97
6,936.0000	CSX CORP	74,816.55	30.8100	213,698.16	138,881.61



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192.0000	CST BRANDS INC	3,402.48	34.5000	6,624.00	3,221.52
554.0000	CVB FINANCIAL CORP	4,875.20	16.0300	8,880.62	4,005.42
7,276.0000	CVS CAREMARK CORP	242,035.92	75.3700	548,392.12	306,356.20
2,792.0000	CA INC	66,072.40	28.7400	80,242.08	14,169.68
258.0000	CABELA'S INC	6,764.76	62.4000	16,099.20	9,334.44
391.0000	CABOT CORP	15,030.04	57.9900	22,674.09	7,644.05
2,488.0000	CABOT OIL & GAS CORP	38,228.12	34.1400	84,940.32	46,712.20
1,601.0000	CADENCE DESIGN SYSTEMS INC	16,346.21	17.4900	28,001.49	11,655.28
290.0000	CALGON CARBON CORP	5,060.50	22.3300	6,475.70	1,415.20
279.0000	CALIFORNIA WATER SERVICE GROUP	5,091.75	24.2000	6,751.80	1,660.05
781.0000	CALLAWAY GOLF CO	4,810.96	8.3200	6,497.92	1,686.96
2,685.0000	CALPINE CORP	35,021.73	23.8100	63,929.85	28,908.12
428.0000	CAMDEN PROPERTY TRUST	22,136.16	71.1500	30,452.20	8,316.04
1,582.0000	CAMERON INTERNATIONAL CORP	65,360.34	67.7100	107,117.22	41,756.88
441.0000	CAMPBELL SOUP CO	14,893.76	45.8100	20,202.21	5,308.45
2,057.0000	CAPITAL ONE FINANCIAL CORP	107,744.99	82.6000	169,908.20	62,163.21
997.0000	CAPITOL FEDERAL FINANCIAL INC	11,764.60	12.1600	12,123.52	358.92



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461.0000	CARDINAL FINANCIAL CORP	4,868.16	18.4600	8,510.06	3,641.90
2,237.0000	CARDINAL HEALTH INC	106,073.02	68.5600	153,368.72	47,295.70
227.0000	CARDTRONICS INC	4,955.41	34.0800	7,736.16	2,780.75
1,381.0000	CAREFUSION CORP	36,180.54	44.3500	61,247.35	25,066.81
181.0000	CARLISLE COS INC	9,945.69	86.6200	15,678.22	5,732.53
1,540.0000	CARMAX INC	40,178.60	52.0100	80,095.40	39,916.80
794.0000	CARNIVAL CORP	26,972.18	37.6500	29,894.10	2,921.92
262.0000	CARPENTER TECHNOLOGY CORP	13,956.74	63.2500	16,571.50	2,614.76
542.0000	CARTER'S INC	22,250.67	68.9300	37,360.06	15,109.39
113.0000	CASEY'S GENERAL STORES INC	4,901.94	70.2900	7,942.77	3,040.83
3,912.0000	CATERPILLAR INC	248,650.99	108.6700	425,117.04	176,466.05
471.0000	CATHAY GENERAL BANCORP	6,579.87	25.5600	12,038.76	5,458.89
467.0000	CAVIUM INC	13,954.43	49.6600	23,191.22	9,236.79
1,125.0000	CELANESE CORP	36,528.75	64.2800	72,315.00	35,786.25
5,276.0000	CELGENE CORP	143,368.48	85.8800	453,102.88	309,734.40
691.0000	CELLDEX THERAPEUTICS INC	10,427.19	16.3200	11,277.12	849.93
298.0000	CENTENE CORP	10,090.28	75.6100	22,531.78	12,441.50



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3,853.0000	CENTERPOINT ENERGY INC	55,054.06	25.5400	98,405.62	43,351.56
794.0000	CENTERSTATE BANKS INC	5,065.72	11.2000	8,892.80	3,827.08
371.0000	CENTRAL PACIFIC FINANCIAL CO	4,889.59	19.8500	7,364.35	2,474.76
659.0000	CENTURY ALUMINUM CO	4,751.39	15.6800	10,333.12	5,581.73
368.0000	CEPHEID INC	11,879.04	47.9400	17,641.92	5,762.88
348.0000	CENTURYLINK INC	12,150.51	36.2000	12,597.60	447.09
1,636.0000	CERNER CORP	45,863.20	51.5800	84,384.88	38,521.68
175.0000	CHART INDUSTRIES INC	8,734.25	82.7300	14,477.75	5,743.50
345.0000	CHARTER COMMUNICATIONS INC	18,803.12	158.3800	54,641.10	35,837.98
608.0000	CHATHAM LODGING TRUST	10,019.84	21.9000	13,315.20	3,295.36
166.0000	CHEESECAKE FACTORY INC/THE	5,132.72	46.4200	7,705.72	2,573.00
272.0000	CHEMICAL FINANCIAL CORP	4,972.16	28.0800	7,637.76	2,665.60
244.0000	CHEMTURA CORP	5,043.48	26.1300	6,375.72	1,332.24
969.0000	CHENIERE ENERGY INC	22,991.46	71.7000	69,477.30	46,485.84
490.0000	CHESAPEAKE ENERGY CORP	9,976.40	31.0800	15,229.20	5,252.80
244.0000	CHESAPEAKE UTILITIES CORP	13,240.44	71.3300	17,404.52	4,164.08
10,096.0000	CHEVRON CORP	653,865.41	130.5500	1,318,032.80	664,167.39



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698.0000	CHICAGO BRIDGE & IRON CO NV	26,147.13	68.2000	47,603.60	21,456.47
1,205.0000	CHICO'S FAS INC	14,508.20	16.9600	20,436.80	5,928.60
113.0000	THE CHILDRENS PLACE INC	4,993.47	49.6300	5,608.19	614.72
12,183.0000	CHIMERA INVESTMENT CORP	32,894.10	3.1900	38,863.77	5,969.67
217.0000	CHIPOTLE MEXICAN GRILL INC	59,252.90	592.5100	128,574.67	69,321.77
1,400.0000	CHUBB CORP	72,907.52	92.1700	129,038.00	56,130.48
839.0000	CHURCH & DWIGHT CO INC	41,370.93	69.9500	58,688.05	17,317.12
115.0000	CHURCHILL DOWNS INC	4,940.40	90.1100	10,362.65	5,422.25
1,186.0000	CIENA CORP	14,504.78	21.6600	25,688.76	11,183.98
611.0000	CIMAREX ENERGY CO	36,879.96	143.4600	87,654.06	50,774.10
1,640.0000	CINCINNATI BELL INC	5,100.40	3.9300	6,445.20	1,344.80
607.0000	CINCINNATI FINANCIAL CORP	17,080.98	48.0400	29,160.28	12,079.30
553.0000	CINEMARK HOLDINGS INC	11,082.12	35.3600	19,554.08	8,471.96
19,367.0000	CISCO SYSTEMS INC	445,957.21	24.8500	481,269.95	35,312.74
266.0000	CIRRUS LOGIC INC	3,777.20	22.7400	6,048.84	2,271.64
753.0000	CINTAS CORP	26,575.77	63.5400	47,845.62	21,269.85
12,000.0000	CITIGROUP INC	489,821.82	47.1000	565,200.00	75,378.18



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1,339.0000	CITRIX SYSTEMS INC	49,438.02	62.5500	83,754.45	34,316.43
156.0000	CITY HOLDING CO	4,907.76	45.1200	7,038.72	2,130.96
279.0000	CITY NATIONAL CORP/CA	11,938.41	75.7600	21,137.04	9,198.63
482.0000	CIVEO CORP	7,503.46	25.0300	12,064.46	4,561.00
111.0000	CLARCOR INC	5,038.29	61.8500	6,865.35	1,827.06
146.0000	CLEARWATER PAPER CORP	5,212.20	61.7200	9,011.12	3,798.92
1,071.0000	CLOROX CO	68,221.63	91.4000	97,889.40	29,667.77
362.0000	COBALT INTERNATIONAL ENERGY IN	4,774.78	18.3500	6,642.70	1,867.92
795.0000	COBIZ FINANCIAL INC	4,984.65	10.7700	8,562.15	3,577.50
158.0000	COCA-COLA BOTTLING CO CONSOLIDATED	9,996.66	73.6700	11,639.86	1,643.20
20,892.0000	COCA-COLA CO/THE	505,534.24	42.3600	884,985.12	379,450.88
2,336.0000	COCA-COLA ENTERPRISES INC	56,975.04	47.7800	111,614.08	54,639.04
6,609.0000	COEUR MINING INC	59,348.82	9.1800	60,670.62	1,321.80
320.0000	COGENT COMMUNICATIONS HOLDINGS INC	5,049.60	34.5500	11,056.00	6,006.40
300.0000	COGNEX CORP	5,055.00	38.4000	11,520.00	6,465.00
3,950.0000	COGNIZANT TECHNOLOGY SOLUTIONS	80,552.84	48.9100	193,194.50	112,641.66



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157.0000	COHEN & STEERS INC	4,953.35	43.3800	6,810.66	1,857.31
97.0000	COHERENT INC	5,028.48	66.1700	6,418.49	1,390.01
631.0000	COLFAX CORP	24,691.03	74.5400	47,034.74	22,343.71
5,126.0000	COLGATE-PALMOLIVE CO	160,590.39	68.1800	349,490.68	188,900.29
529.0000	COLUMBIA BANKING SYSTEM INC	9,517.21	26.3100	13,917.99	4,400.78
13,611.0000	COMCAST CORP	333,376.04	53.6800	730,638.48	397,262.44
426.0000	COMERICA INC	14,809.16	50.1600	21,368.16	6,559.00
893.0000	COMMERCE BANCSHARES INC/MO	28,858.31	46.5000	41,524.50	12,666.19
1,375.0000	COMMERCIAL METALS CO	19,717.50	17.3100	23,801.25	4,083.75
657.0000	COMMONWEALTH REIT	15,200.43	26.3200	17,292.24	2,091.81
219.0000	COMMUNITY BANK SYSTEM INC	5,315.13	36.2000	7,927.80	2,612.67
924.0000	COMMUNITY HEALTH SYSTEMS INC	16,280.88	45.3700	41,921.88	25,641.00
205.0000	COMMUNITY TRUST BANCORP INC	5,029.95	34.2200	7,015.10	1,985.15
263.0000	COMMVault SYSTEMS INC	10,846.12	49.1700	12,931.71	2,085.59
67.0000	COMPASS MINERALS INTERNATIONAL	4,975.42	95.7400	6,414.58	1,439.16
832.0000	COMPUTER SCIENCES CORP	40,508.73	63.2000	52,582.40	12,073.67
2,821.0000	COMPUWARE CORP	22,168.55	9.9900	28,181.79	6,013.24



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421.0000	COMSCORE INC	9,855.61	35.4800	14,937.08	5,081.47
361.0000	COMSTOCK RESOURCES INC	8,043.08	28.8400	10,411.24	2,368.16
412.0000	COMTECH TELECOMMUNICATIONS COR	9,912.72	37.3300	15,379.96	5,467.24
2,260.0000	CONAGRA FOODS INC	55,380.85	29.6800	67,076.80	11,695.95
700.0000	CONCHO RESOURCES INC/MIDLAND T	36,526.00	144.5000	101,150.00	64,624.00
464.0000	CONCUR TECHNOLOGIES INC	31,895.36	93.3400	43,309.76	11,414.40
170.0000	CONNECTICUT WATER SERVICE INC	5,026.90	33.8700	5,757.90	731.00
6,959.0000	CONOCOPHILLIPS	317,036.08	85.7300	596,595.07	279,558.99
306.0000	CONSOLIDATED COMMUNICATIONS HO	5,055.12	22.2400	6,805.44	1,750.32
1,593.0000	CONSOLIDATED EDISON INC	75,714.59	57.7400	91,979.82	16,265.23
661.0000	CONSTELLATION BRANDS INC	14,170.95	88.1300	58,253.93	44,082.98
132.0000	CONTANGO OIL & GAS CO	4,843.08	42.3100	5,584.92	741.84
257.0000	CONTINENTAL RESOURCES INC/OK	20,103.78	158.0400	40,616.28	20,512.50
1,136.0000	CONVERGYS CORP	14,972.48	21.4400	24,355.84	9,383.36
468.0000	CONVERSANT INC	7,628.40	25.4000	11,887.20	4,258.80
92.0000	COOPER COS INC/THE	6,992.92	135.5300	12,468.76	5,475.84
364.0000	COOPER TIRE & RUBBER CO	6,329.96	30.0000	10,920.00	4,590.04



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220.0000	COPART INC	4,946.70	35.9600	7,911.20	2,964.50
192.0000	CORELOGIC INC	5,018.88	30.3600	5,829.12	810.24
4,483.0000	CORNING INC	55,861.06	21.9500	98,401.85	42,540.79
122.0000	CORPORATE EXECUTIVE BOARD CO/T	5,004.44	68.2200	8,322.84	3,318.40
1,028.0000	CORPORATE OFFICE PROPERTIES TR	22,338.44	27.8100	28,588.68	6,250.24
544.0000	CORRECTIONS CORP OF AMERICA	11,880.96	32.8500	17,870.40	5,989.44
2,575.0000	COSTCO WHOLESALE CORP	128,933.85	115.1600	296,537.00	167,603.15
88.0000	COSTAR GROUP INC	4,916.56	158.1700	13,918.96	9,002.40
465.0000	COURIER CORP	4,915.05	14.9200	6,937.80	2,022.75
291.0000	COVANCE INC	15,001.05	85.5800	24,903.78	9,902.73
429.0000	COVANTA HOLDING CORP	6,902.61	20.6100	8,841.69	1,939.08
104.0000	CRANE CO	4,877.60	74.3600	7,733.44	2,855.84
442.0000	CREE INC	16,050.22	49.9500	22,077.90	6,027.68
1,743.0000	CROWN CASTLE INTERNATIONAL COR	66,896.34	74.2600	129,435.18	62,538.84
531.0000	CROWN HOLDINGS INC	18,044.86	49.7600	26,422.56	8,377.70
591.0000	CUBESMART	6,081.39	18.3200	10,827.12	4,745.73
357.0000	CUBIST PHARMACEUTICALS INC	12,752.04	69.8200	24,925.74	12,173.70



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397.0000	CUBIST PHARMACEUTIC CVR W I	853.55	0.1160	46.05	807.50-
802.0000	CUMMINS INC	60,919.55	154.2900	123,740.58	62,821.03
158.0000	CURTISS-WRIGHT CORP	4,942.24	65.5600	10,358.48	5,416.24
2,715.0000	CYAN INC	10,778.55	4.0300	10,941.45	162.90
159.0000	CYBERONICS INC	5,156.37	62.4600	9,931.14	4,774.77
284.0000	CYTEC INDUSTRIES INC	15,057.68	105.4200	29,939.28	14,881.60
1,462.0000	DCT INDUSTRIAL TRUST INC	7,485.44	8.2100	12,003.02	4,517.58
1,732.0000	DDR CORP	22,621.30	17.6300	30,535.16	7,913.86
1,729.0000	DR HORTON INC	24,185.23	24.5800	42,498.82	18,313.59
97.0000	DST SYSTEMS INC	4,959.61	92.1700	8,940.49	3,980.88
1,476.0000	DTE ENERGY CO	61,695.63	77.8700	114,936.12	53,240.49
204.0000	DSW INC	5,049.00	27.9400	5,699.76	650.76
933.0000	DANA HOLDING CORP	11,447.91	24.4200	22,783.86	11,335.95
3,429.0000	DANAHER CORP	118,894.95	78.7300	269,965.17	151,070.22
480.0000	DARDEN RESTAURANTS INC	20,680.85	46.2700	22,209.60	1,528.75
298.0000	DARLING INGREDIENTS INC	4,928.92	20.9000	6,228.20	1,299.28
1,200.0000	DAVITA HEALTHCARE PARTNERS INC	38,734.45	72.3200	86,784.00	48,049.55



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245.0000	DEALERTRACK TECHNOLOGY INC	5,230.75	45.3400	11,108.30	5,877.55
545.0000	DEAN FOODS CO	6,202.92	17.5900	9,586.55	3,383.63
108.0000	DECKERS OUTDOOR CORP	5,114.88	86.3300	9,323.64	4,208.76
1,284.0000	DEERE & CO	54,509.88	90.5500	116,266.20	61,756.32
5,693.0000	DELTA AIR LINES INC	74,847.16	38.7200	220,432.96	145,585.80
2,832.0000	DENBURY RESOURCES INC	48,762.51	18.4600	52,278.72	3,516.21
306.0000	DELUXE CORP	7,203.24	58.5800	17,925.48	10,722.24
1,279.0000	DENNY'S CORP	4,898.57	6.5200	8,339.08	3,440.51
830.0000	DENTSPLY INTERNATIONAL INC	24,724.01	47.3500	39,300.50	14,576.49
1,071.0000	DEVON ENERGY CORP	66,640.73	79.4000	85,037.40	18,396.67
66.0000	DIAMOND HILL INVESTMENT GROUP	5,039.10	127.7200	8,429.52	3,390.42
1,551.0000	DIAMONDROCK HOSPITALITY CO	15,154.80	12.8200	19,883.82	4,729.02
561.0000	DICK'S SPORTING GOODS INC	20,863.59	46.5600	26,120.16	5,256.57
566.0000	DIGITAL REALTY TRUST INC	27,467.98	58.3200	33,009.12	5,541.14
1,038.0000	DIGITALGLOBE INC	16,555.03	27.8000	28,856.40	12,301.37
280.0000	DILLARD'S INC	16,599.17	116.6100	32,650.80	16,051.63
9,350.0000	WALT DISNEY CO/THE	287,240.56	85.7400	801,669.00	514,428.44



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241.0000	DISCOVERY COMMUNICATIONS INC	9,846.87	74.2800	17,901.48	8,054.61
1,498.0000	DISH NETWORK CORP	37,681.81	65.0800	97,489.84	59,808.03
3,195.0000	DISCOVER FINANCIAL SERVICES	76,910.88	61.9800	198,026.10	121,115.22
3,124.0000	DIRECTV	97,971.11	85.0100	265,571.24	167,600.13
297.0000	DOLBY LABORATORIES INC	9,771.30	43.2000	12,830.40	3,059.10
1,311.0000	DOLLAR GENERAL CORP	54,913.08	57.3600	75,198.96	20,285.88
894.0000	DOLLAR TREE INC	26,904.15	54.4600	48,687.24	21,783.09
3,184.0000	DOMINION RESOURCES INC/VA	123,041.86	71.5200	227,719.68	104,677.82
368.0000	DOMINO'S PIZZA INC	9,126.40	73.0900	26,897.12	17,770.72
548.0000	DOMTAR CORP	20,974.70	42.8500	23,481.80	2,507.10
678.0000	DONALDSON CO INC	19,695.90	42.3200	28,692.96	8,997.06
941.0000	DOUGLAS EMMETT INC	15,272.43	28.2200	26,555.02	11,282.59
352.0000	DOUGLAS DYNAMICS INC	5,047.68	17.6200	6,202.24	1,154.56
1,331.0000	DOVER CORP	52,944.42	90.9500	121,054.45	68,110.03
6,174.0000	DOW CHEMICAL CO/THE	225,574.58	51.4600	317,714.04	92,139.46
1,284.0000	DR PEPPER SNAPPLE GROUP INC	31,503.33	58.5800	75,216.72	43,713.39
425.0000	DREAMWORKS ANIMATION SKG INC	8,912.25	23.2600	9,885.50	973.25



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113.0000	DRESSER-RAND GROUP INC	5,674.86	63.7300	7,201.49	1,526.63
201.0000	DRIL-QUIP INC	15,041.95	109.2400	21,957.24	6,915.29
5,363.0000	EI DU PONT DE NEMOURS & CO	232,377.89	65.4400	350,954.72	118,576.83
3,368.0000	DUKE ENERGY CORP NEW COM	178,535.69	74.1900	249,871.92	71,336.23
2,075.0000	DUKE REALTY CORP	24,341.05	18.1600	37,682.00	13,340.95
494.0000	DUN & BRADSTREET CORP	37,941.03	110.2000	54,438.80	16,497.77
851.0000	DUNKIN' BRANDS GROUP INC	27,538.36	45.8100	38,984.31	11,445.95
350.0000	DUPONT FABROS TECHNOLOGY INC	8,708.00	26.9600	9,436.00	728.00
321.0000	DYCOM INDUSTRIES INC	4,798.95	31.3100	10,050.51	5,251.56
12,530.0000	EMC CORP/MA	201,685.88	26.3400	330,040.20	128,354.32
3,284.0000	EOG RESOURCES INC	136,438.69	116.8600	383,768.24	247,329.55
802.0000	EQT CORP	40,398.61	106.9000	85,733.80	45,335.19
278.0000	EPR PPTYS COM SH BEN INT	12,782.44	55.8700	15,531.86	2,749.42
315.0000	ERA GROUP INC	5,876.06	28.6800	9,034.20	3,158.14
166.0000	EAGLE BANCORP INC	1,933.15	33.7500	5,602.50	3,669.35
1,013.0000	E*TRADE FINANCIAL CORP	9,035.96	21.2600	21,536.38	12,500.42
227.0000	EAGLE MATERIALS INC	14,862.68	94.2800	21,401.56	6,538.88



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952.0000	EAST WEST BANCORP INC	17,678.64	34.9900	33,310.48	15,631.84
260.0000	EASTGROUP PROPERTIES INC	14,975.68	64.2300	16,699.80	1,724.12
779.0000	EASTMAN CHEMICAL CO	52,480.91	87.3500	68,045.65	15,564.74
6,220.0000	EBAY INC	185,727.22	50.0600	311,373.20	125,645.98
541.0000	ECHOSTAR CORP	10,898.07	52.9400	28,640.54	17,742.47
1,516.0000	ECOLAB INC	68,641.93	111.3400	168,791.44	100,149.51
2,405.0000	EDISON INTERNATIONAL	99,952.72	58.1100	139,754.55	39,801.83
597.0000	EDUCATION REALTY TRUST INC	4,955.10	10.7400	6,411.78	1,456.68
248.0000	EL PASO ELECTRIC CO	8,052.56	40.2100	9,972.08	1,919.52
1,802.0000	ELECTRONIC ARTS INC	32,547.30	35.8700	64,637.74	32,090.44
309.0000	ELECTRONICS FOR IMAGING INC	5,101.59	45.2000	13,966.80	8,865.21
358.0000	PERRY ELLIS INTERNATIONAL INC	5,083.60	17.4400	6,243.52	1,159.92
398.0000	EMCOR GROUP INC	11,311.16	44.5300	17,722.94	6,411.78
4,384.0000	EMERSON ELECTRIC CO	184,578.23	66.3600	290,922.24	106,344.01
262.0000	EMPIRE DISTRICT ELECTRIC CO/TH	4,878.44	25.6800	6,728.16	1,849.72
315.0000	EMPLOYERS HOLDINGS INC	5,021.10	21.1800	6,671.70	1,650.60
220.0000	ENCORE WIRE CORP	5,108.40	49.0400	10,788.80	5,680.40



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417.0000	ENERGEN CORP	19,623.06	88.8800	37,062.96	17,439.90
198.0000	ENERGIZER HOLDINGS INC	15,243.60	122.0300	24,161.94	8,918.34
202.0000	ENERSYS	5,369.16	68.7900	13,895.58	8,526.42
138.0000	ENGILITY HOLDINGS INC	2,514.21	38.2600	5,279.88	2,765.67
399.0000	ENLINK MIDSTREAM LLC	5,159.07	41.6600	16,622.34	11,463.27
800.0000	ENTEGRIS INC	7,832.00	13.7450	10,996.00	3,164.00
390.0000	ENTERPRISE FINANCIAL SERVICES	5,190.90	18.0600	7,043.40	1,852.50
576.0000	EQUIFAX INC	21,032.64	72.5400	41,783.04	20,750.40
256.0000	EQUINIX INC	25,320.96	210.0900	53,783.04	28,462.08
292.0000	EQUITY LIFESTYLE PROPERTIES IN	9,962.80	44.1600	12,894.72	2,931.92
2,037.0000	EQUITY RESIDENTIAL	102,871.24	63.0000	128,331.00	25,459.76
325.0000	ESSEX PROPERTY TRUST INC	49,810.96	184.9100	60,095.75	10,284.79
133.0000	ESTERLINE TECHNOLOGIES CORP	9,975.00	115.1200	15,310.96	5,335.96
242.0000	ETHAN ALLEN INTERIORS INC	5,055.38	24.7400	5,987.08	931.70
321.0000	EURONET WORLDWIDE INC	4,827.84	48.2400	15,485.04	10,657.20
623.0000	EVERCORE PARTNERS INC	16,135.62	57.6400	35,909.72	19,774.10
202.0000	EVERBANK FINANCIAL CORP	3,276.44	20.1600	4,072.32	795.88



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1,031.0000	EXACT SCIENCES CORP	10,907.98	17.0300	17,557.93	6,649.95
4,467.0000	EXCEL TRUST INC	58,339.90	13.3300	59,545.11	1,205.21
2,673.0000	EXELON CORP	82,630.22	36.4800	97,511.04	14,880.82
1,669.0000	EXELIS INC	18,407.67	16.9800	28,339.62	9,931.95
658.0000	EXPEDIA INC	22,356.33	78.7600	51,824.08	29,467.75
186.0000	EXPONENT INC	9,830.10	74.1100	13,784.46	3,954.36
4,840.0000	EXPRESS SCRIPTS HOLDING CO	183,729.14	69.3300	335,557.20	151,828.06
559.0000	EXTRA SPACE STORAGE INC	11,453.91	53.2500	29,766.75	18,312.84
1,588.0000	EXTREME NETWORKS	4,859.28	4.4400	7,050.72	2,191.44
20,752.0000	EXXON MOBIL CORP	1,362,799.84	100.6800	2,089,311.36	726,511.52
166.0000	FBL FINANCIAL GROUP INC	5,033.12	46.0000	7,636.00	2,602.88
231.0000	FEI CO	8,401.47	90.7300	20,958.63	12,557.16
770.0000	FLIR SYSTEMS INC	19,265.00	34.7300	26,742.10	7,477.10
1,622.0000	FMC TECHNOLOGIES INC	34,793.93	61.0700	99,055.54	64,261.61
756.0000	FNB CORP/PA	7,643.16	12.8200	9,691.92	2,048.76
528.0000	FXCM INC	5,169.12	14.9600	7,898.88	2,729.76
165.0000	FTD COS INC	3,787.68	31.7900	5,245.35	1,457.67



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9,509.0000	FACEBOOK INC	226,785.98	67.2900	639,860.61	413,074.63
238.0000	FAIR ISAAC CORP	6,899.62	63.7600	15,174.88	8,275.26
1,523.0000	FAIRWAY GROUP HOLDINGS CORP	10,310.71	6.6500	10,127.95	182.76-
233.0000	FAMILY DOLLAR STORES INC	11,461.27	66.1400	15,410.62	3,949.35
123.0000	FARO TECHNOLOGIES INC	5,098.35	49.1200	6,041.76	943.41
398.0000	FASTENAL CO	10,660.93	49.4900	19,697.02	9,036.09
396.0000	FEDERAL REALTY INVESTMENT TRUS	40,703.41	120.9200	47,884.32	7,180.91
1,806.0000	FEDEX CORP	194,657.43	151.3800	273,392.28	78,734.85
3,634.0000	FELCOR LODGING TRUST INC	16,825.42	10.5100	38,193.34	21,367.92
2,111.0000	FEMALE HEALTH CO/THE	9,678.73	5.5100	11,631.61	1,952.88
514.0000	F5 NETWORKS INC	44,029.66	111.4400	57,280.16	13,250.50
1,976.0000	FIDELITY NATIONAL INFORMATION	47,318.14	54.7400	108,166.24	60,848.10
1,493.0000	FIDELITY NATIONAL FINANCIAL IN	20,603.40	32.7600	48,910.68	28,307.28
4,200.0000	FIFTH THIRD BANCORP	61,688.34	21.3500	89,670.00	27,981.66
724.0000	FINANCIAL ENGINES INC	15,001.28	45.2800	32,782.72	17,781.44
311.0000	FINANCIAL INSTITUTIONS INC	5,010.21	23.4200	7,283.62	2,273.41
86.0000	FINISAR CORP	1,382.02	19.7500	1,698.50	316.48



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626.0000	FIRST AMERICAN FINANCIAL CORP	9,615.36	27.7900	17,396.54	7,781.18
966.0000	FIRST BUSEY CORP	5,119.80	5.8100	5,612.46	492.66
187.0000	FIRST CASH FINANCIAL SERVICES	7,278.04	57.5900	10,769.33	3,491.29
77.0000	FIRST CITIZENS BANCSHARES INC/	15,462.06	245.0000	18,865.00	3,402.94
1,067.0000	FIRST COMMONWEALTH FINANCIAL C	5,217.63	9.2200	9,837.74	4,620.11
366.0000	FIRST DEFIANCE FINANCIAL CORP	5,223.11	28.7000	10,504.20	5,281.09
376.0000	FIRST FINANCIAL BANKSHARES INC	6,282.96	31.3700	11,795.12	5,512.16
349.0000	FIRST FINANCIAL BANCORP	5,772.46	17.2100	6,006.29	233.83
557.0000	FIRST HORIZON NATIONAL CORP	5,590.54	11.8600	6,606.02	1,015.48
465.0000	FIRST INDUSTRIAL REALTY TRUST	4,998.75	18.8400	8,760.60	3,761.85
189.0000	FIRST OF LONG ISLAND CORP/THE	5,097.33	39.0800	7,386.12	2,288.79
974.0000	FIRST MIDWEST BANCORP INC/IL	10,412.72	17.0300	16,587.22	6,174.50
440.0000	FIRST REPUBLIC BANK/CA	12,878.80	54.9900	24,195.60	11,316.80
225.0000	FIRST SOLAR INC	10,152.00	71.0600	15,988.50	5,836.50
245.0000	1ST SOURCE CORP	4,922.05	30.6200	7,501.90	2,579.85
2,222.0000	FISERV INC	52,428.54	60.3200	134,031.04	81,602.50
1,587.0000	FIRSTMERIT CORP	23,011.50	19.7500	31,343.25	8,331.75



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346.0000	FIRSTENERGY CORP	11,241.54	34.7200	12,013.12	771.58
1,887.0000	FIVE STAR QUALITY CARE INC	5,211.33	5.0100	9,453.87	4,242.54
11.0000	FLEETCOR TECHNOLOGIES INC	783.09	131.8000	1,449.80	666.71
527.0000	FLOTEK INDUSTRIES INC	4,774.62	32.1600	16,948.32	12,173.70
949.0000	FLUOR CORP	39,974.97	76.9000	72,978.10	33,003.13
264.0000	FLOWERS FOODS INC	4,996.64	21.0800	5,565.12	568.48
516.0000	FLOWERVE CORP	27,554.00	74.3500	38,364.60	10,810.60
921.0000	FOOT LOCKER INC	22,334.25	50.7200	46,713.12	24,378.87
21,767.0000	FORD MOTOR CO	204,409.37	17.2400	375,263.08	170,853.71
521.0000	FOREST CITY ENTERPRISES INC	8,268.27	19.8700	10,352.27	2,084.00
425.0000	FOREST LABORATORIES INC	15,610.18	99.0000	42,075.00	26,464.82
305.0000	FORESTAR GROUP INC	4,901.35	19.0900	5,822.45	921.10
1,353.0000	FORTUNE BRANDS HOME & SECURITY	30,916.20	39.9300	54,025.29	23,109.09
153.0000	FORWARD AIR CORP	4,974.03	47.8500	7,321.05	2,347.02
230.0000	FRANKLIN ELECTRIC CO INC	5,146.25	40.3300	9,275.90	4,129.65
2,235.0000	FRANKLIN RESOURCES INC	77,012.67	57.8400	129,272.40	52,259.73
421.0000	FRANKLIN STREET PROPERTIES COR	5,195.14	12.5800	5,296.18	101.04



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4,892.0000	FREEMPORT-MCMORAN COPPER & GOLD	155,450.12	36.5000	178,558.00	23,107.88
5,528.0000	FRONTIER COMMUNICATIONS CORP	25,573.92	5.8400	32,283.52	6,709.60
228.0000	HB FULLER CO	5,344.32	48.1000	10,966.80	5,622.48
2,206.0000	FULTON FINANCIAL CORP	22,721.80	12.3900	27,332.34	4,610.54
5,467.0000	FUSION-IO INC	59,631.75	11.3000	61,777.10	2,145.35
157.0000	G&K SERVICES INC	4,879.56	52.0700	8,174.99	3,295.43
109.0000	GAMCO INVESTORS INCORPORATED CLASS A	4,884.29	83.0500	9,052.45	4,168.16
135.0000	GATX CORP	4,895.10	66.9400	9,036.90	4,141.80
146.0000	GEO GROUP INC/THE	5,066.20	35.7300	5,216.58	150.38
1,810.0000	GAIAM INC	13,955.10	7.6800	13,900.80	54.30-
658.0000	ARTHUR J GALLAGHER & CO	18,443.74	46.6000	30,662.80	12,219.06
345.0000	GAMING AND LEISURE PROPERTIES	10,640.39	33.9700	11,719.65	1,079.26
841.0000	GAMESTOP CORP	21,975.33	40.4700	34,035.27	12,059.94
2,003.0000	GANNETT CO INC	26,740.05	31.3100	62,713.93	35,973.88
1,936.0000	GAP INC/THE	44,768.06	41.5700	80,479.52	35,711.46
824.0000	GARTNER INC	33,889.84	70.5200	58,108.48	24,218.64



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781.0000	GENCORP INC	4,904.68	19.1000	14,917.10	10,012.42
269.0000	GENERAC HOLDINGS INC	5,054.51	48.7400	13,111.06	8,056.55
1,880.0000	GENERAL DYNAMICS CORP	135,351.16	116.5500	219,114.00	83,762.84
44,824.0000	GENERAL ELECTRIC CO	1,286,947.65	26.2800	1,177,974.72	108,972.93-
2,621.0000	GENERAL GROWTH PROPERTIES INC	30,915.86	23.5600	61,750.76	30,834.90
4,192.0000	GENERAL MILLS INC	119,358.19	52.5400	220,247.68	100,889.49
4,472.0000	GENERAL MOTORS CO	123,786.46	36.3000	162,333.60	38,547.14
111.0000	GENESCO INC	5,663.22	82.1300	9,116.43	3,453.21
437.0000	GENESEE & WYOMING INC	31,195.21	105.0000	45,885.00	14,689.79
447.0000	GENUINE PARTS CO	24,532.52	87.8000	39,246.60	14,714.08
4,094.0000	GENWORTH FINANCIAL INC	21,206.92	17.4000	71,235.60	50,028.68
3,206.0000	GERON CORP	5,129.60	3.2100	10,291.26	5,161.66
457.0000	GIBRALTAR INDUSTRIES INC	4,958.45	15.5100	7,088.07	2,129.62
3,020.0000	GIGAMON INC	58,316.20	19.1400	57,802.80	513.40-
7,858.0000	GILEAD SCIENCES INC	181,624.52	82.9100	651,506.78	469,882.26
857.0000	GLACIER BANCORP INC	10,690.57	28.3800	24,321.66	13,631.09
267.0000	GLADSTONE COMMERCIAL CORP	4,528.32	17.8700	4,771.29	242.97



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331.0000	PH GLATFELTER CO	4,981.55	26.5300	8,781.43	3,799.88
595.0000	GLIMCHER REALTY TRUST	5,509.70	10.8300	6,443.85	934.15
836.0000	GLOBAL PAYMENTS INC	36,317.71	72.8500	60,902.60	24,584.89
3,146.0000	GOLD RESOURCE CORP	14,777.08	5.0600	15,918.76	1,141.68
1,288.0000	GOLDMAN SACHS GROUP INC/THE	190,939.31	167.4400	215,662.72	24,723.41
346.0000	GOLUB CAPITAL BDC INC	5,241.90	17.7000	6,124.20	882.30
1,825.0000	GOODYEAR TIRE & RUBBER CO/THE	26,715.63	27.7800	50,698.50	23,982.87
1,250.0000	GOOGLE INC	258,800.05	584.6700	730,837.50	472,037.45
1,469.0000	GOOGLE INC	331,633.46	575.2800	845,086.32	513,452.86
556.0000	WR GRACE & CO	26,668.87	94.5300	52,558.68	25,889.81
729.0000	GRACO INC	23,524.83	78.0800	56,920.32	33,395.49
12.0000	GRAHAM HOLDINGS CO	4,801.68	718.1100	8,617.32	3,815.64
2,258.0000	GRAMERCY PROPERTY TRUST INC	10,048.10	6.0500	13,660.90	3,612.80
377.0000	GRAND CANYON EDUCATION INC	5,108.35	45.9700	17,330.69	12,222.34
230.0000	GRANITE CONSTRUCTION INC	5,621.20	35.9800	8,275.40	2,654.20
2,181.0000	GRAPHIC PACKAGING HOLDING CO	10,425.85	11.7000	25,517.70	15,091.85
923.0000	GREAT LAKES DREDGE & DOCK CORP	4,827.29	7.9900	7,374.77	2,547.48



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269.0000	GREAT SOUTHERN BANCORP INC	4,898.49	32.0500	8,621.45	3,722.96
881.0000	GREAT PLAINS ENERGY INC	17,144.26	26.8700	23,672.47	6,528.21
567.0000	GREEN DOT CORP	7,189.56	18.9800	10,761.66	3,572.10
485.0000	GREEN PLAINS INC	4,951.85	32.8700	15,941.95	10,990.10
249.0000	GREENBRIER COS INC	4,932.69	57.6000	14,342.40	9,409.71
519.0000	GREENHILL & CO INC	20,666.58	49.2500	25,560.75	4,894.17
98.0000	GREIF INC	5,065.62	54.5600	5,346.88	281.26
511.0000	GRIFFON CORP	4,997.58	12.4000	6,336.40	1,338.82
131.0000	GROUP 1 AUTOMOTIVE INC	5,148.30	84.3100	11,044.61	5,896.31
1,700.0000	GROUPON INC	7,514.00	6.6200	11,254.00	3,740.00
355.0000	GULF COAST ULTRA DEEP ROYALTY	621.25	2.9000	1,029.50	408.25
123.0000	GULFMARK OFFSHORE INC	5,034.39	45.1800	5,557.14	522.75
532.0000	GULFPORT ENERGY CORP	19,895.66	62.8000	33,409.60	13,513.94
379.0000	H&E EQUIPMENT SERVICES INC	4,839.83	36.3400	13,772.86	8,933.03
286.0000	HCC INSURANCE HOLDINGS INC	9,962.58	48.9400	13,996.84	4,034.26
2,918.0000	HCP INC	95,797.94	41.3800	120,746.84	24,948.90
350.0000	HFF INC	4,802.00	37.1900	13,016.50	8,214.50



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267.0000	HNI CORP	6,442.71	39.1100	10,442.37	3,999.66
163.0000	HSN INC	4,995.95	59.2400	9,656.12	4,660.17
92.0000	HAIN CELESTIAL GROUP INC/THE	5,118.88	88.7400	8,164.08	3,045.20
5,619.0000	HALLIBURTON CO	169,469.33	71.0100	399,005.19	229,535.86
758.0000	HALOZYME THERAPEUTICS INC	4,972.48	9.8800	7,489.04	2,516.56
599.0000	HANCOCK HOLDING CO	19,111.17	35.3200	21,156.68	2,045.51
863.0000	HANESBRANDS INC	26,028.50	98.4400	84,953.72	58,925.22
136.0000	HANOVER INSURANCE GROUP INC/TH	4,955.84	63.1500	8,588.40	3,632.56
935.0000	HARLEY-DAVIDSON INC	48,699.57	69.8500	65,309.75	16,610.18
343.0000	HARMAN INTERNATIONAL INDUSTRIE	15,012.35	107.4300	36,848.49	21,836.14
1,002.0000	HARRIS CORP	38,923.09	75.7500	75,901.50	36,978.41
213.0000	HARSCO CORP	4,990.59	26.6300	5,672.19	681.60
2,156.0000	HARTFORD FINANCIAL SERVICES GR	52,994.04	35.8100	77,206.36	24,212.32
335.0000	HASBRO INC	12,317.95	53.0500	17,771.75	5,453.80
879.0000	HAWAIIAN HOLDINGS INC	5,054.25	13.7100	12,051.09	6,996.84
290.0000	HAWAIIAN TELCOM HOLDCO INC	5,744.90	28.6100	8,296.90	2,552.00
380.0000	HEALTHSOUTH CORP	10,028.20	35.8700	13,630.60	3,602.40



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238.0000	HEALTHCARE REALTY TRUST INC	4,874.24	25.4200	6,049.96	1,175.72
1,110.0000	HEADWATERS INC	10,134.30	13.8900	15,417.90	5,283.60
1,091.0000	HEALTH CARE REIT INC	43,150.40	62.6700	68,372.97	25,222.57
565.0000	HEALTH NET INC	15,040.30	41.5400	23,470.10	8,429.80
820.0000	HEALTHWAYS INC	5,584.20	17.5400	14,382.80	8,798.60
912.0000	HEALTHCARE TRUST OF AMERICA IN	10,177.92	12.0400	10,980.48	802.56
255.0000	HEARTLAND PAYMENT SYSTEMS INC	5,212.20	41.2100	10,508.55	5,296.35
157.0000	HEICO CORP	5,350.56	51.9400	8,154.58	2,804.02
941.0000	HELIX ENERGY SOLUTIONS GROUP I	15,328.58	26.3100	24,757.71	9,429.13
856.0000	HELMERICH & PAYNE INC	34,687.26	116.1100	99,390.16	64,702.90
514.0000	JACK HENRY & ASSOCIATES INC	15,060.20	59.4300	30,547.02	15,486.82
985.0000	HERITAGE COMMERCE CORP	4,869.25	8.1700	8,047.45	3,178.20
1,585.0000	HERCULES OFFSHORE INC	5,452.40	4.0200	6,371.70	919.30
492.0000	HERCULES TECHNOLOGY GROWTH CAP	5,072.52	16.1600	7,950.72	2,878.20
1,099.0000	HERITAGE FINANCIAL CORP/WA	16,066.78	16.0900	17,682.91	1,616.13
918.0000	HERSHA HOSPITALITY TRUST	4,993.92	6.7100	6,159.78	1,165.86
615.0000	HERSHEY CO/THE	34,111.07	97.3700	59,882.55	25,771.48



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1,568.0000	HERTZ GLOBAL HOLDINGS INC	26,598.74	28.0300	43,951.04	17,352.30
1,735.0000	HESS CORP	83,570.22	98.8900	171,574.15	88,003.93
5,015.0000	HEWLETT-PACKARD CO	95,660.57	33.6800	168,905.20	73,244.63
238.0000	HEXCEL CORP	4,990.86	40.9000	9,734.20	4,743.34
130.0000	HIBBETT SPORTS INC	5,092.10	54.1700	7,042.10	1,950.00
2,778.0000	HIGHER ONE HOLDINGS INC	10,417.50	3.8100	10,584.18	166.68
151.0000	HIGHWOODS PROPERTIES INC	4,898.44	41.9500	6,334.45	1,436.01
149.0000	HILL-ROM HOLDINGS INC	5,264.17	41.5100	6,184.99	920.82
215.0000	HILLENBRAND INC	4,882.65	32.6200	7,013.30	2,130.65
439.0000	HILLSHIRE BRANDS CO	14,884.55	62.3000	27,349.70	12,465.15
1,984.0000	HOLOGIC INC	36,485.40	25.3500	50,294.40	13,809.00
418.0000	HOME BANCSHARES INC/AR	4,932.40	32.8200	13,718.76	8,786.36
7,213.0000	HOME DEPOT INC/THE	263,783.02	80.9600	583,964.48	320,181.46
149.0000	HOME PROPERTIES INC	8,835.70	63.9600	9,530.04	694.34
313.0000	HOMEAWAY INC	10,138.07	34.8200	10,898.66	760.59
4,602.0000	HONEYWELL INTERNATIONAL INC	190,391.89	92.9500	427,755.90	237,364.01
331.0000	HORACE MANN EDUCATORS CORP	4,951.76	31.2700	10,350.37	5,398.61



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371.0000	HORMEL FOODS CORP	10,843.61	49.3500	18,308.85	7,465.24
120.0000	HORNBECK OFFSHORE SERVICES INC	4,995.60	46.9200	5,630.40	634.80
1,240.0000	HOSPITALITY PROPERTIES TRUST	28,796.72	30.4000	37,696.00	8,899.28
184.0000	HOSPIRA INC	5,166.72	51.3700	9,452.08	4,285.36
3,225.0000	HOST HOTELS & RESORTS INC	53,664.10	22.0100	70,982.25	17,318.15
185.0000	HOWARD HUGHES CORP/THE	15,117.50	157.8300	29,198.55	14,081.05
136.0000	HUB GROUP INC	4,920.48	50.4000	6,854.40	1,933.92
109.0000	HUBBELL INC	10,076.58	123.1500	13,423.35	3,346.77
583.0000	HUDSON CITY BANCORP INC	5,037.12	9.8300	5,730.89	693.77
568.0000	HUDSON PACIFIC PROPERTIES INC	8,792.64	25.3400	14,393.12	5,600.48
278.0000	HUDSON VALLEY HOLDING CORP	4,920.60	18.0500	5,017.90	97.30
1,049.0000	HUMANA INC	66,947.91	127.7200	133,978.28	67,030.37
544.0000	JB HUNT TRANSPORT SERVICES INC	24,871.68	73.7800	40,136.32	15,264.64
7,366.0000	HUNTINGTON BANCSHARES INC/OH	38,818.82	9.5400	70,271.64	31,452.82
371.0000	HUNTINGTON INGALLS INDUSTRIES	13,890.61	94.5900	35,092.89	21,202.28
825.0000	HUNTSMAN CORP	15,050.88	28.1000	23,182.50	8,131.62
165.0000	HURON CONSULTING GROUP INC	4,851.00	70.8200	11,685.30	6,834.30



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263.0000	HYATT HOTELS CORP	10,325.38	60.9800	16,037.74	5,712.36
29.0000	HYSTER-YALE MATERIALS HANDLING	903.94	88.5400	2,567.66	1,663.72
437.0000	IAC/INTERACTIVECORP	15,950.50	69.2300	30,253.51	14,303.01
198.0000	ICF INTERNATIONAL INC	4,950.00	35.3600	7,001.28	2,051.28
2,377.0000	ISTAR FINANCIAL INC	15,359.36	14.9800	35,607.46	20,248.10
809.0000	ITT CORP	15,859.06	48.1000	38,912.90	23,053.84
315.0000	IDACORP INC	15,032.32	57.8300	18,216.45	3,184.13
287.0000	IDEX CORP	14,860.69	80.7400	23,172.38	8,311.69
342.0000	IDEXX LABORATORIES INC	25,571.34	133.5700	45,680.94	20,109.60
283.0000	IHS INC	27,100.08	135.6700	38,394.61	11,294.53
2,700.0000	ILLINOIS TOOL WORKS INC	121,693.05	87.5600	236,412.00	114,718.95
755.0000	ILLUMINA INC	29,679.05	178.5400	134,797.70	105,118.65
447.0000	IMMUNOGEN INC	5,207.55	11.8500	5,296.95	89.40
389.0000	IMPAX LABORATORIES INC	7,865.58	29.9900	11,666.11	3,800.53
1,021.0000	INCYTE CORP LTD	16,407.47	56.4400	57,625.24	41,217.77
190.0000	INDEPENDENT BANK CORP/ROCKLAND	4,932.40	38.3800	7,292.20	2,359.80
291.0000	INFORMATICA CORP	9,789.24	35.6500	10,374.15	584.91



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784.0000	INFINERA CORP	5,166.56	9.2000	7,212.80	2,046.24
301.0000	INGLES MARKETS INC	4,809.98	26.3500	7,931.35	3,121.37
268.0000	INGRAM MICRO INC	5,006.24	29.2100	7,828.28	2,822.04
455.0000	INGREDION INC	24,374.35	75.0400	34,143.20	9,768.85
305.0000	INSIGHT ENTERPRISES INC	5,072.15	30.7400	9,375.70	4,303.55
156.0000	INNOSPEC INC	4,873.11	43.1700	6,734.52	1,861.41
1,491.0000	INNERWORKINGS INC	10,362.45	8.5000	12,673.50	2,311.05
245.0000	INSULET CORP	5,049.45	39.6700	9,719.15	4,669.70
2,154.0000	INTEGRATED DEVICE TECHNOLOGY I	13,311.72	15.4600	33,300.84	19,989.12
567.0000	INTEGRATED SILICON SOLUTION IN	5,165.37	14.7700	8,374.59	3,209.22
27,632.0000	INTEL CORP	577,413.07	30.9000	853,828.80	276,415.73
629.0000	INTER PARFUMS INC	10,258.99	29.5500	18,586.95	8,327.96
1,474.0000	INTERACTIVE BROKERS GROUP INC	24,203.52	23.2900	34,329.46	10,125.94
405.0000	INTERCONTINENTAL EXCHANGE INC	62,072.82	188.9000	76,504.50	14,431.68
1,049.0000	INTERMUNE INC	10,227.75	44.1500	46,313.35	36,085.60
1,103.0000	INTERNATIONAL BANCSHARES CORP	17,780.36	27.0000	29,781.00	12,000.64
5,222.0000	INTERNATIONAL BUSINESS MACHINE	428,818.63	181.2700	946,591.94	517,773.31



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765.0000	INTERNATIONAL FLAVORS & FRAGRA	30,347.78	104.2800	79,774.20	49,426.42
2,397.0000	INTERNATIONAL PAPER CO	84,337.97	50.4700	120,976.59	36,638.62
472.0000	INTERNATIONAL RECTIFIER CORP	9,628.80	27.9000	13,168.80	3,540.00
590.0000	INTERNATIONAL SPEEDWAY CORP	14,974.20	33.2800	19,635.20	4,661.00
650.0000	INTERSIL CORP	5,408.00	14.9500	9,717.50	4,309.50
3,472.0000	INTERPUBLIC GROUP OF COS INC/T	34,267.60	19.5100	67,738.72	33,471.12
377.0000	INTERVAL LEISURE GROUP INC	5,051.80	21.9400	8,271.38	3,219.58
231.0000	INTUITIVE SURGICAL INC	63,814.24	411.8000	95,125.80	31,311.56
2,109.0000	INTUIT INC	68,806.34	80.5300	169,837.77	101,031.43
872.0000	INVENSENSE INC	9,321.68	22.6900	19,785.68	10,464.00
611.0000	INVESCO MORTGAGE CAPITAL INC	9,691.26	17.3600	10,606.96	915.70
925.0000	INVESTORS BANCORP INC NEW COM	5,045.78	11.0500	10,221.25	5,175.47
4,789.0000	IRIDIUM COMMUNICATIONS INC	38,654.72	8.4600	40,514.94	1,860.22
1,326.0000	IRON MOUNTAIN INC	33,146.08	35.4500	47,006.70	13,860.62
502.0000	ISIS PHARMACEUTICALS INC	14,096.16	34.4500	17,293.90	3,197.74
813.0000	ITC HOLDINGS CORP	21,861.82	36.4800	29,658.24	7,796.42
524.0000	ITRON INC	19,209.84	40.5500	21,248.20	2,038.36



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5,092.0000	JGWPT HOLDINGS INC-A	57,590.52	11.2600	57,335.92	254.60-
22,214.0000	JPMORGAN CHASE & CO	913,455.61	57.6200	1,279,970.68	366,515.07
970.0000	JMP GROUP INC	5,984.90	7.5700	7,342.90	1,358.00
1,169.0000	JABIL CIRCUIT INC	20,656.23	20.9000	24,432.10	3,775.87
225.0000	JACK IN THE BOX INC	5,033.25	59.8400	13,464.00	8,430.75
670.0000	JACOBS ENGINEERING GROUP INC	27,365.06	53.2800	35,697.60	8,332.54
2,397.0000	JANUS CAPITAL GROUP INC	17,881.62	12.4800	29,914.56	12,032.94
898.0000	JARDEN CORP	19,037.60	59.3500	53,296.30	34,258.70
852.0000	JETBLUE AIRWAYS CORP	4,311.12	10.8500	9,244.20	4,933.08
14,084.0000	JOHNSON & JOHNSON	909,443.84	104.6200	1,473,468.08	564,024.24
4,261.0000	JOHNSON CONTROLS INC	105,245.70	49.9300	212,751.73	107,506.03
444.0000	JONES LANG LASALLE INC	33,051.36	126.3900	56,117.16	23,065.80
624.0000	JOY GLOBAL INC	36,522.72	61.5800	38,425.92	1,903.20
180.0000	J2 GLOBAL INC	4,905.00	50.8600	9,154.80	4,249.80
3,410.0000	JUNIPER NETWORKS INC	58,954.79	24.5400	83,681.40	24,726.61
1,104.0000	KLA-TENCOR CORP	51,270.14	72.6400	80,194.56	28,924.42
97.0000	KAISER ALUMINUM CORP	5,134.21	72.8700	7,068.39	1,934.18



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230.0000	KANSAS CITY SOUTHERN	12,788.00	107.5100	24,727.30	11,939.30
646.0000	KAPSTONE PAPER AND PACKAGING C	5,151.85	33.1300	21,401.98	16,250.13
530.0000	KATE SPADE & CO	9,778.50	38.1400	20,214.20	10,435.70
1,511.0000	KB HOME	12,254.21	18.6800	28,225.48	15,971.27
1,641.0000	KELLOGG CO	81,823.05	65.7000	107,813.70	25,990.65
320.0000	KELLY SERVICES INC	5,027.20	17.1700	5,494.40	467.20
329.0000	KEMPER CORPORATION	9,298.36	36.8600	12,126.94	2,828.58
325.0000	KENNAMETAL INC	12,970.75	46.2800	15,041.00	2,070.25
690.0000	KEURIG GREEN MOUNTAIN INC	19,078.68	124.6100	85,980.90	66,902.22
1,603.0000	KEY ENERGY SERVICES INC	9,714.18	9.1400	14,651.42	4,937.24
6,527.0000	KEYCORP	48,234.53	14.3300	93,531.91	45,297.38
667.0000	KEYW HOLDING CORP/THE	4,970.82	12.5700	8,384.19	3,413.37
380.0000	KFORCE INC	4,913.40	21.6500	8,227.00	3,313.60
348.0000	KILROY REALTY CORP	13,241.40	62.2800	21,673.44	8,432.04
1,962.0000	KIMBERLY-CLARK CORP	128,447.53	111.2200	218,213.64	89,766.11
2,422.0000	KIMCO REALTY CORP	43,813.98	22.9800	55,657.56	11,843.58
1,499.0000	KINDER MORGAN INC/DELAWARE	44,300.51	36.2600	54,353.74	10,053.23



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320.0000	KIRBY CORP	17,798.40	117.1400	37,484.80	19,686.40
1,071.0000	KITE REALTY GROUP TRUST	4,905.18	6.1400	6,575.94	1,670.76
306.0000	KNIGHT TRANSPORTATION INC	4,938.84	23.7700	7,273.62	2,334.78
665.0000	KNOWLES CORP	10,420.51	30.7400	20,442.10	10,021.59
1,717.0000	KODIAK OIL & GAS CORP	10,477.12	14.5500	24,982.35	14,505.23
139.0000	KOPPERS HOLDINGS INC	5,005.39	38.2500	5,316.75	311.36
3,179.0000	KRAFT FOODS GROUP INC	94,370.93	59.9500	190,581.05	96,210.12
847.0000	KRATOS DEFENSE & SECURITY SOLU	5,082.00	7.8000	6,606.60	1,524.60
3,778.0000	KROGER CO/THE	86,211.23	49.4300	186,746.54	100,535.31
465.0000	KULICKE & SOFFA INDUSTRIES INC	5,124.30	14.2600	6,630.90	1,506.60
1,785.0000	L BRANDS INC	48,435.27	58.6600	104,708.10	56,272.83
391.0000	LHC GROUP INC	5,106.46	21.3700	8,355.67	3,249.21
244.0000	LKQ CORP	5,043.48	26.6900	6,512.36	1,468.88
450.0000	LPL FINANCIAL HOLDINGS INC	15,174.00	49.7400	22,383.00	7,209.00
132.0000	LTC PROPERTIES INC	4,909.08	39.0400	5,153.28	244.20
514.0000	LA-Z-BOY INC	4,821.32	23.1700	11,909.38	7,088.06
594.0000	LABORATORY CORP OF AMERICA HOL	39,747.99	102.4000	60,825.60	21,077.61



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121.0000	LACLEDE GROUP INC/THE	4,974.31	48.5500	5,874.55	900.24
306.0000	LAKELAND BANCORP INC	2,728.33	10.8000	3,304.80	576.47
231.0000	LAKELAND FINANCIAL CORP	5,109.72	38.1600	8,814.96	3,705.24
1,075.0000	LAM RESEARCH CORP	26,373.33	67.5800	72,648.50	46,275.17
725.0000	LAMAR ADVERTISING CO	17,624.75	53.0000	38,425.00	20,800.25
68.0000	LANCASTER COLONY CORP	4,872.20	95.1600	6,470.88	1,598.68
110.0000	LANDSTAR SYSTEM INC	4,950.00	64.0000	7,040.00	2,090.00
1,433.0000	LAS VEGAS SANDS CORP	53,875.85	76.2200	109,223.26	55,347.41
723.0000	LASALLE HOTEL PROPERTIES	17,967.86	35.2900	25,514.67	7,546.81
1,086.0000	LEAP WIRELESS INTL CONTRA	0.00	0.0000	0.00	0.00
772.0000	LEAR CORP	35,353.67	89.3200	68,955.04	33,601.37
645.0000	LEGGETT & PLATT INC	14,847.90	34.2800	22,110.60	7,262.70
637.0000	LEGG MASON INC	18,066.78	51.3100	32,684.47	14,617.69
288.0000	LEIDOS HLDGS INC	10,287.31	38.3400	11,041.92	754.61
1,244.0000	LENNAR CORP	47,296.88	41.9800	52,223.12	4,926.24
507.0000	LENNOX INTERNATIONAL INC	22,782.20	89.5700	45,411.99	22,629.79
1,579.0000	LEUCADIA NATIONAL CORP	26,409.32	26.2200	41,401.38	14,992.06



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478.0000	LEVEL 3 COMMUNICATIONS INC	9,962.99	43.9100	20,988.98	11,025.99
1,405.0000	LEXINGTON REALTY TRUST	11,522.34	11.0100	15,469.05	3,946.71
471.0000	LEXMARK INTERNATIONAL INC	12,938.37	48.1600	22,683.36	9,744.99
3,713.0000	LIBERTY INTERACTIVE CORP	51,091.13	29.3600	109,013.68	57,922.55
392.0000	LIBERTY VENTURES	7,251.74	73.8000	28,929.60	21,677.86
735.0000	LIBERTY PROPERTY TRUST	22,785.00	37.9300	27,878.55	5,093.55
251.0000	LIFE TIME FITNESS INC	9,502.86	48.7400	12,233.74	2,730.88
312.0000	LIFEPOINT HOSPITALS INC	11,821.68	62.1000	19,375.20	7,553.52
2,365.0000	ELI LILLY & CO	121,034.00	62.1700	147,032.05	25,998.05
421.0000	LINCOLN ELECTRIC HOLDINGS INC	14,010.88	69.8800	29,419.48	15,408.60
1,255.0000	LINCOLN NATIONAL CORP	38,084.44	51.4400	64,557.20	26,472.76
80.0000	LINDSAY CORP	4,973.60	84.4700	6,757.60	1,784.00
1,828.0000	LINEAR TECHNOLOGY CORP	57,940.65	47.0700	86,043.96	28,103.31
453.0000	LINKEDIN CORP	48,727.57	171.4700	77,675.91	28,948.34
894.0000	LIONS GATE ENTERTAINMENT CORP	14,080.50	28.5800	25,550.52	11,470.02
89.0000	LITTELFUSE INC	4,903.90	92.9500	8,272.55	3,368.65
238.0000	LIVE NATION ENTERTAINMENT INC	2,606.10	24.6900	5,876.22	3,270.12



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1,032.0000	LOCKHEED MARTIN CORP	88,824.78	160.7300	165,873.36	77,048.58
2,189.0000	LOEWS CORP	83,039.72	44.0100	96,337.89	13,298.17
2,868.0000	LORILLARD INC	67,783.75	60.9700	174,861.96	107,078.21
6,475.0000	LOWE'S COS INC	185,660.91	47.9900	310,735.25	125,074.34
300.0000	LUMBER LIQUIDATORS HOLDINGS IN	15,402.00	75.9500	22,785.00	7,383.00
448.0000	M&T BANK CORP	41,798.97	124.0500	55,574.40	13,775.43
323.0000	MB FINANCIAL INC	6,137.00	27.0500	8,737.15	2,600.15
1,123.0000	MDU RESOURCES GROUP INC	24,762.15	35.1000	39,417.30	14,655.15
2,118.0000	MFA FINANCIAL INC	17,049.90	8.2100	17,388.78	338.88
550.0000	MGE ENERGY INC	16,324.79	39.5100	21,730.50	5,405.71
1,967.0000	MGIC INVESTMENT CORP	11,861.01	9.2400	18,175.08	6,314.07
2,956.0000	MGM RESORTS INTERNATIONAL	32,169.52	26.4000	78,038.40	45,868.88
310.0000	MKS INSTRUMENTS INC	7,777.90	31.2400	9,684.40	1,906.50
138.0000	MSA SAFETY INC	4,854.84	57.4800	7,932.24	3,077.40
76.0000	MSC INDUSTRIAL DIRECT CO	4,953.68	95.6400	7,268.64	2,314.96
592.0000	MSCI INC	19,662.02	45.8500	27,143.20	7,481.18
171.0000	MTS SYSTEMS CORP	9,876.96	67.7600	11,586.96	1,710.00



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43.0000	MWI VETERINARY SUPPLY INC	5,339.74	141.9900	6,105.57	765.83
832.0000	MACERICH CO/THE	36,059.04	66.7500	55,536.00	19,476.96
2,180.0000	MACY'S INC	81,456.04	58.0200	126,483.60	45,027.56
324.0000	STEVEN MADDEN LTD	7,583.76	34.3000	11,113.20	3,529.44
93.0000	MAGELLAN HEALTH INC	4,841.58	62.2400	5,788.32	946.74
371.0000	MAGNUM HUNTER RES CORP DEL WT EXP 04/15/2016	0.00	0.0000	0.00	0.00
109.0000	MAIN STREET CAPITAL CORP	2,012.14	32.9300	3,589.37	1,577.23
649.0000	MAINSOURCE FINANCIAL GROUP INC	5,750.14	17.2500	11,195.25	5,445.11
112.0000	MANHATTAN ASSOCIATES INC	2,021.04	34.4300	3,856.16	1,835.12
1,365.0000	MANITOWOC CO INC/THE	17,359.29	32.8600	44,853.90	27,494.61
747.0000	MANPOWERGROUP INC	27,982.62	84.8500	63,382.95	35,400.33
4,386.0000	MARATHON OIL CORP	101,828.74	39.9200	175,089.12	73,260.38
1,426.0000	MARATHON PETROLEUM CORP	76,363.69	78.0700	111,327.82	34,964.13
398.0000	MARCUS CORP	5,034.70	18.2500	7,263.50	2,228.80
106.0000	MARKEL CORP	39,935.18	655.6400	69,497.84	29,562.66
208.0000	MARKETAXESS HOLDINGS INC	5,002.40	54.0600	11,244.48	6,242.08



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358.0000	MARKETO INC	10,625.44	29.0800	10,410.64	214.80-
228.0000	MARRIOTT VACATIONS WORLDWIDE CORP	8,796.24	58.6300	13,367.64	4,571.40
3,197.0000	MARSH & MCLENNAN COS INC	93,159.98	51.8200	165,668.54	72,508.56
1,728.0000	MARRIOTT INTERNATIONAL INC/DE	62,685.91	64.1000	110,764.80	48,078.89
744.0000	MARTEN TRANSPORT LTD	9,869.66	22.3500	16,628.40	6,758.74
263.0000	MARTIN MARIETTA MATERIALS INC	24,547.70	132.0500	34,729.15	10,181.45
2,793.0000	MASCO CORP	39,100.82	22.2000	62,004.60	22,903.78
336.0000	MASTEC INC	6,132.00	30.8200	10,355.52	4,223.52
6,250.0000	MASTERCARD INC	215,625.61	73.4700	459,187.50	243,561.89
571.0000	MATSON INC	10,212.74	26.8400	15,325.64	5,112.90
2,521.0000	MATTEL INC	50,438.74	38.9700	98,243.37	47,804.63
151.0000	MATTHEWS INTERNATIONAL CORP	5,013.20	41.5700	6,277.07	1,263.87
1,328.0000	MAXIM INTEGRATED PRODUCTS INC	31,553.28	33.8100	44,899.68	13,346.40
248.0000	MAXIMUS INC	4,969.30	43.0200	10,668.96	5,699.66
770.0000	MCCORMICK & CO INC/MD	38,243.12	71.5900	55,124.30	16,881.18
4,460.0000	MCDONALD'S CORP	177,239.07	100.7400	449,300.40	272,061.33



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186.0000	MCGRATH RENTCORP	5,025.72	36.7500	6,835.50	1,809.78
588.0000	MCGRAW HILL FINANCIAL INC	28,242.44	83.0300	48,821.64	20,579.20
1,569.0000	MCKESSON CORP	83,836.84	186.2100	292,163.49	208,326.65
1,406.0000	MEAD JOHNSON NUTRITION CO	60,154.27	93.1700	130,997.02	70,842.75
940.0000	MEADWESTVACO CORP	22,578.97	44.2600	41,604.40	19,025.43
148.0000	MEASUREMENT SPECIALTIES INC	4,857.36	86.0700	12,738.36	7,881.00
526.0000	MEDALLION FINANCIAL CORP	5,207.40	12.4600	6,553.96	1,346.56
431.0000	MEDICAL PROPERTIES TRUST INC	4,896.16	13.2400	5,706.44	810.28
295.0000	MEDICINES CO/THE	4,838.00	29.0600	8,572.70	3,734.70
604.0000	MEDIVATION INC	30,272.48	77.0800	46,556.32	16,283.84
476.0000	MEDNAX INC	19,747.21	58.1500	27,679.40	7,932.19
3,703.0000	MEDTRONIC INC	173,194.24	63.7600	236,103.28	62,909.04
306.0000	MEN'S WEARHOUSE INC/THE	9,948.06	55.8000	17,074.80	7,126.74
572.0000	MENTOR GRAPHICS CORP	7,041.32	21.5700	12,338.04	5,296.72
17,748.0000	MERCK & CO INC	748,602.49	57.8500	1,026,721.80	278,119.31
160.0000	MEREDITH CORP	4,865.60	48.3600	7,737.60	2,872.00
221.0000	MERITAGE HOMES CORP	5,049.85	42.2100	9,328.41	4,278.56



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828.0000	MERITOR INC	4,148.28	13.0400	10,797.12	6,648.84
1,807.0000	MERRIMACK PHARMACEUTICALS INC	11,022.70	7.2900	13,173.03	2,150.33
94.0000	MESA LABORATORIES INC	5,018.66	83.9600	7,892.24	2,873.58
2,214.0000	METLIFE INC	78,290.24	55.5600	123,009.84	44,719.60
191.0000	METTLER-TOLEDO INTERNATIONAL I	30,401.47	253.1800	48,357.38	17,955.91
337.0000	MICROS SYSTEMS INC	14,878.23	67.9000	22,882.30	8,004.07
41,623.0000	MICROSOFT CORP	1,138,650.28	41.7000	1,735,679.10	597,028.82
1,133.0000	MICROCHIP TECHNOLOGY INC	40,635.05	48.8100	55,301.73	14,666.68
5,324.0000	MICRON TECHNOLOGY INC	45,101.99	32.9500	175,425.80	130,323.81
514.0000	MICROSEMI CORP	10,141.22	26.7600	13,754.64	3,613.42
335.0000	MID-AMERICA APARTMENT COMMUNIT	20,370.95	73.0500	24,471.75	4,100.80
462.0000	MIDDLEBY CORP	15,559.41	82.7200	38,216.64	22,657.23
233.0000	MIDDLESEX WATER CO	4,499.23	21.1800	4,934.94	435.71
5,476.0000	MILLENNIAL MEDIA INC	25,682.44	4.9900	27,325.24	1,642.80
274.0000	MINERALS TECHNOLOGIES INC	8,787.18	65.5800	17,968.92	9,181.74
250.0000	MOBILE MINI INC	5,067.50	47.8900	11,972.50	6,905.00
748.0000	MODINE MANUFACTURING CO	5,071.44	15.7400	11,773.52	6,702.08



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339.0000	MOHAWK INDUSTRIES INC	19,329.78	138.3400	46,897.26	27,567.48
834.0000	MOLSON COORS BREWING CO	43,378.71	74.1600	61,849.44	18,470.73
9,885.0000	MONDELEZ INTERNATIONAL INC	185,336.65	37.6100	371,774.85	186,438.20
584.0000	MONMOUTH REAL ESTATE INVESTMEN	4,905.60	10.0400	5,863.36	957.76
345.0000	MONOLITHIC POWER SYSTEMS INC	5,226.75	42.3500	14,610.75	9,384.00
148.0000	MONRO MUFFLER BRAKE INC	5,046.80	53.1900	7,872.12	2,825.32
3,046.0000	MONSANTO CO	150,052.29	124.7400	379,958.04	229,905.75
542.0000	MONSTER BEVERAGE CORP	21,154.26	71.0300	38,498.26	17,344.00
1,396.0000	MOODY'S CORP	45,565.44	87.6600	122,373.36	76,807.92
270.0000	MOOG INC	11,134.80	72.8900	19,680.30	8,545.50
6,244.0000	MORGAN STANLEY	126,587.27	32.3300	201,868.52	75,281.25
294.0000	MOVADO GROUP INC	4,933.32	41.6700	12,250.98	7,317.66
450.0000	MUELLER INDUSTRIES INC	8,181.00	29.4100	13,234.50	5,053.50
1,230.0000	MURPHY OIL CORP	54,993.25	66.4800	81,770.40	26,777.15
307.0000	MURPHY USA INC	8,906.37	48.8900	15,009.23	6,102.86
2,793.0000	MYLAN INC/PA	58,179.15	51.5600	144,007.08	85,827.93
231.0000	NBT BANCORP INC	5,058.90	24.0200	5,548.62	489.72



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449.0000	NCI BUILDING SYSTEMS INC	4,992.88	19.4300	8,724.07	3,731.19
1,436.0000	NCR CORP	29,771.82	35.0900	50,389.24	20,617.42
685.0000	NPS PHARMACEUTICALS INC	10,480.50	33.0500	22,639.25	12,158.75
2,430.0000	NRG ENERGY INC	51,479.21	37.2000	90,396.00	38,916.79
25.0000	NVR INC	18,348.40	1,150.6000	28,765.00	10,416.60
55.0000	NACCO INDUSTRIES INC	1,640.63	50.6000	2,783.00	1,142.37
790.0000	NASDAQ OMX GROUP INC/THE	26,129.25	38.6200	30,509.80	4,380.55
211.0000	NATIONAL HEALTHCARE CORP	9,881.13	56.2900	11,877.19	1,996.06
405.0000	NATIONAL FUEL GAS CO	24,523.40	78.3000	31,711.50	7,188.10
1,299.0000	NATIONAL OILWELL VARCO INC	52,284.43	82.3500	106,972.65	54,688.22
736.0000	NATIONAL PENN BANCSHARES INC	5,623.04	10.5800	7,786.88	2,163.84
346.0000	NATIONAL RETAIL PROPERTIES INC	9,935.06	37.1900	12,867.74	2,932.68
283.0000	NATURAL GAS SERVICES GROUP INC	4,944.01	33.0600	9,355.98	4,411.97
289.0000	NAVISTAR INTERNATIONAL CORP	9,658.38	37.4800	10,831.72	1,173.34
507.0000	NAVIGANT CONSULTING INC	5,070.00	17.4500	8,847.15	3,777.15
3,528.0000	NAVIENT CORP W/D	36,831.15	17.7100	62,480.88	25,649.73
233.0000	NELNET INC	5,039.79	41.4300	9,653.19	4,613.40



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312.0000	NETFLIX INC	17,453.28	440.6000	137,467.20	120,013.92
244.0000	NETSCOUT SYSTEMS INC	4,862.92	44.3400	10,818.96	5,956.04
348.0000	NETSUITE INC	19,133.98	86.8800	30,234.24	11,100.26
110.0000	NEW JERSEY RESOURCES CORP	4,907.10	57.1600	6,287.60	1,380.50
2,617.0000	NEW YORK COMMUNITY BANCORP INC	31,508.68	15.9800	41,819.66	10,310.98
7,404.0000	NEW YORK MORTGAGE TRUST INC	58,121.40	7.8100	57,825.24	296.16-
1,492.0000	NEW YORK TIMES CO/THE	11,785.88	15.2100	22,693.32	10,907.44
815.0000	NEWELL RUBBERMAID INC	19,101.70	30.9900	25,256.85	6,155.15
920.0000	NEWFIELD EXPLORATION CO	22,194.32	44.2000	40,664.00	18,469.68
28.0000	NEWMARKET CORP	6,298.54	392.1100	10,979.08	4,680.54
564.0000	NEWPARK RESOURCES INC	4,980.12	12.4600	7,027.44	2,047.32
2,841.0000	NEWS CORP	25,202.85	17.9400	50,967.54	25,764.69
496.0000	NEWSTAR FINANCIAL INC	4,786.40	14.0600	6,973.76	2,187.36
2,658.0000	NEXTERA ENERGY INC	122,443.98	102.4800	272,391.84	149,947.86
2,470.0000	NIKE INC	55,773.43	77.5500	191,548.50	135,775.07
1,800.0000	NISOURCE INC	38,945.66	39.3400	70,812.00	31,866.34
2,394.0000	NOBLE ENERGY INC	85,888.63	77.4600	185,439.24	99,550.61



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1,086.0000	NORDSTROM INC	46,826.48	67.9300	73,771.98	26,945.50
2,215.0000	NORFOLK SOUTHERN CORP	95,394.07	103.0300	228,211.45	132,817.38
1,703.0000	NORTHEAST UTILITIES	57,612.19	47.2700	80,500.81	22,888.62
506.0000	NORTHFIELD BANCORP INC/NJ	5,089.21	13.1100	6,633.66	1,544.45
1,623.0000	NORTHROP GRUMMAN CORP	99,613.14	119.6300	194,159.49	94,546.35
1,272.0000	NORTHSTAR REALTY FINANCE CORP	4,884.48	17.3800	22,107.36	17,222.88
631.0000	NORTHWEST BANCSHARES INC	7,666.65	13.5700	8,562.67	896.02
199.0000	NORTHWEST PIPE CO	4,736.20	40.3300	8,025.67	3,289.47
127.0000	NORTHWESTERN CORP	4,991.10	52.1900	6,628.13	1,637.03
250.0000	NOVARTIS AG ADR	13,859.99	90.5300	22,632.50	8,772.51
324.0000	NOW INC/DE	5,806.76	36.2100	11,732.04	5,925.28
173.0000	NU SKIN ENTERPRISES INC	6,248.76	73.9600	12,795.08	6,546.32
428.0000	NUCOR CORP	19,298.76	49.2500	21,079.00	1,780.24
1,043.0000	NVIDIA CORP	14,935.76	18.5400	19,337.22	4,401.46
730.0000	OGE ENERGY CORP	19,800.98	39.0800	28,528.40	8,727.42
1,695.0000	NUVERRA ENVIRONMENTAL SOLUTION	23,799.99	20.1100	34,086.45	10,286.46



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<u>SHARES/ PAR VALUE</u>	<u>SECURITY DESCRIPTION</u>	<u>COST</u>	<u>PRICE</u>	<u>MARKET VALUE</u>	<u>UNREALIZED GAIN/LOSS</u>
260.0000	O'REILLY AUTOMOTIVE INC	24,086.40	150.6000	39,156.00	15,069.60
420.0000	OFG BANCORP	4,863.60	18.4100	7,732.20	2,868.60
321.0000	OASIS PETROLEUM INC	9,866.14	55.8900	17,940.69	8,074.55
4,677.0000	OCCIDENTAL PETROLEUM CORP	224,022.41	102.6300	480,000.51	255,978.10
256.0000	OCEANEERING INTERNATIONAL INC	10,759.38	78.1300	20,001.28	9,241.90
384.0000	OCEANFIRST FINANCIAL CORP	4,995.84	16.5600	6,359.04	1,363.20
4,141.0000	OFFICE DEPOT INC	9,603.60	5.6900	23,562.29	13,958.69
241.0000	OIL STATES INTERNATIONAL INC	9,971.45	64.0900	15,445.69	5,474.24
207.0000	OLD DOMINION FREIGHT LINE INC	4,987.32	63.6800	13,181.76	8,194.44
563.0000	OLD NATIONAL BANCORP/IN	5,804.53	14.2800	8,039.64	2,235.11
2,881.0000	OLD REPUBLIC INTERNATIONAL COR	26,706.87	16.5400	47,651.74	20,944.87
474.0000	OLIN CORP	10,314.24	26.9200	12,760.08	2,445.84
780.0000	OMNICARE INC	18,720.00	66.5700	51,924.60	33,204.60
1,619.0000	OMNICOM GROUP INC	75,745.96	71.2200	115,305.18	39,559.22
604.0000	OMEGA HEALTHCARE INVESTORS INC	12,321.60	36.8600	22,263.44	9,941.84
962.0000	OMEGA PROTEIN CORP	6,195.28	13.6800	13,160.16	6,964.88
339.0000	OMNIVISION TECHNOLOGIES INC	4,749.39	21.9800	7,451.22	2,701.83



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2.0000	OMNIAMERICAN BANCORP INC	30.00	25.0000	50.00	20.00
1,997.0000	ON SEMICONDUCTOR CORP	16,013.97	9.1400	18,252.58	2,238.61
391.0000	ONE GAS INC	4,511.97	37.7500	14,760.25	10,248.28
316.0000	ONE LIBERTY PROPERTIES INC	4,964.36	21.3400	6,743.44	1,779.08
2,485.0000	1-800-FLOWERS.COM INC	14,288.75	5.8000	14,413.00	124.25
1,565.0000	ONEOK INC	31,998.55	68.0800	106,545.20	74,546.65
162.0000	OPENTABLE INC	10,355.04	103.6000	16,783.20	6,428.16
2,508.0000	OPKO HEALTH INC	9,954.42	8.8400	22,170.72	12,216.30
20,667.0000	ORACLE CORP	369,265.55	40.5300	837,633.51	468,367.96
356.0000	ORBITAL SCIENCES CORP	5,211.84	29.5500	10,519.80	5,307.96
10,105.0000	OREXIGEN THERAPEUTICS INC	60,427.90	6.1800	62,448.90	2,021.00
853.0000	ORION MARINE GROUP INC	5,263.01	10.8300	9,237.99	3,974.98
394.0000	ORITANI FINANCIAL CORP	4,988.04	15.3900	6,063.66	1,075.62
502.0000	ORMAT TECHNOLOGIES INC	9,957.56	28.8300	14,472.66	4,515.10
216.0000	OSHKOSH CORP	8,340.48	55.5300	11,994.48	3,654.00
187.0000	OUTERWALL INC	9,466.88	59.3500	11,098.45	1,631.57
164.0000	OWENS & MINOR INC	4,995.44	33.9800	5,572.72	577.28



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922.0000	OWENS CORNING	27,927.17	38.6800	35,662.96	7,735.79
1,197.0000	OWENS-ILLINOIS INC	31,163.44	34.6400	41,464.08	10,300.64
166.0000	PDC ENERGY INC	4,926.88	63.1500	10,482.90	5,556.02
2,696.0000	PDL BIOPHARMA INC	15,602.88	9.6800	26,097.28	10,494.40
2,398.0000	PG&E CORP	100,853.40	48.0200	115,151.96	14,298.56
813.0000	PHH CORP	13,605.15	22.9800	18,682.74	5,077.59
1,396.0000	PMC - SIERRA INC	7,524.44	7.6100	10,623.56	3,099.12
1,791.0000	PNC FINANCIAL SERVICES GROUP I	130,583.06	89.0500	159,488.55	28,905.49
1,383.0000	PNM RESOURCES INC	25,490.37	29.3300	40,563.39	15,073.02
753.0000	PPG INDUSTRIES INC	50,994.06	210.1500	158,242.95	107,248.89
2,859.0000	PPL CORP	90,863.13	35.5300	101,580.27	10,717.14
135.0000	PS BUSINESS PARKS INC	9,931.53	83.4900	11,271.15	1,339.62
500.0000	PVH CORP	38,476.70	116.6000	58,300.00	19,823.30
708.0000	PTC INC	16,156.56	38.8000	27,470.40	11,313.84
2,396.0000	PACCAR INC	90,894.66	62.8300	150,540.68	59,646.02
4,329.0000	PACIFIC SUNWEAR OF CALIFORNIA	10,346.31	2.3800	10,303.02	43.29-
303.0000	PACKAGING CORP OF AMERICA	10,062.45	71.4900	21,661.47	11,599.02



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873.0000	PACWEST BANCORP	18,662.17	43.1700	37,687.41	19,025.24
837.0000	PALL CORP	25,915.53	85.3900	71,471.43	45,555.90
329.0000	PALO ALTO NETWORKS INC	17,535.70	83.8500	27,586.65	10,050.95
479.0000	PANDORA MEDIA INC	4,746.89	29.5000	14,130.50	9,383.61
11.0000	PANERA BREAD CO	1,382.37	149.8300	1,648.13	265.76
350.0000	PAREXEL INTERNATIONAL CORP	7,808.50	52.8400	18,494.00	10,685.50
394.0000	PARK ELECTROCHEMICAL CORP	9,680.58	28.2100	11,114.74	1,434.16
253.0000	PARK-OHIO HOLDINGS CORP	5,039.76	58.1100	14,701.83	9,662.07
841.0000	PARKER DRILLING CO	4,734.83	6.5200	5,483.32	748.49
1,010.0000	PARKER HANNIFIN CORP	52,650.09	125.7300	126,987.30	74,337.21
304.0000	PATTERSON COS INC	9,228.30	39.5100	12,011.04	2,782.74
670.0000	PATTERSON-UTI ENERGY INC	14,862.67	34.9400	23,409.80	8,547.13
1,790.0000	PAYCHEX INC	56,924.29	41.5600	74,392.40	17,468.11
248.0000	PEBBLEBROOK HOTEL TRUST	4,816.16	36.9600	9,166.08	4,349.92
403.0000	PENN NATIONAL GAMING INC	3,428.84	12.1400	4,892.42	1,463.58
1,011.0000	JC PENNEY CO INC	8,532.84	9.0500	9,149.55	616.71
302.0000	PENNS WOODS BANCORP INC	12,360.86	47.1000	14,224.20	1,863.34



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976.0000	PENNSYLVANIA REAL ESTATE INVES	13,459.04	18.8200	18,368.32	4,909.28
301.0000	PENNYMAC MORTGAGE INVESTMENT T	4,894.26	21.9400	6,603.94	1,709.68
265.0000	PENSKE AUTOMOTIVE GROUP INC	5,708.10	49.5000	13,117.50	7,409.40
1,450.0000	PEPCO HOLDINGS INC	26,593.00	27.4800	39,846.00	13,253.00
7,132.0000	PEPSICO INC	465,755.26	89.3400	637,172.88	171,417.62
441.0000	PERKINELMER INC	14,886.81	46.8400	20,656.44	5,769.63
320.0000	PETSMART INC	15,325.20	59.8000	19,136.00	3,810.80
436.0000	PHARMACYCLICS INC	25,475.48	89.7100	39,113.56	13,638.08
26,926.0000	PFIZER INC	749,873.57	29.6800	799,163.68	49,290.11
7,973.0000	PHILIP MORRIS INTERNATIONAL IN	328,890.96	84.3100	672,203.63	343,312.67
3,806.0000	PHILLIPS 66	103,393.91	80.4300	306,116.58	202,722.67
170.0000	PIEDMONT NATURAL GAS CO INC	4,996.30	37.4100	6,359.70	1,363.40
366.0000	PIER 1 IMPORTS INC	4,172.40	15.4100	5,640.06	1,467.66
1,117.0000	PILGRIM'S PRIDE CORP	5,683.25	27.3600	30,561.12	24,877.87
538.0000	PINNACLE ENTERTAINMENT INC	10,200.48	25.1800	13,546.84	3,346.36
322.0000	PINNACLE FINANCIAL PARTNERS IN	4,842.88	39.4800	12,712.56	7,869.68
454.0000	PINNACLE WEST CAPITAL CORP	19,893.33	57.8400	26,259.36	6,366.03



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602.0000	PIONEER NATURAL RESOURCES CO	70,291.45	229.8100	138,345.62	68,054.17
142.0000	PLANTRONICS INC	4,955.80	48.0500	6,823.10	1,867.30
158.0000	PLEXUS CORP	5,040.20	43.2900	6,839.82	1,799.62
1,160.0000	PLUM CREEK TIMBER CO INC	41,275.91	45.1000	52,316.00	11,040.09
520.0000	POLARIS INDUSTRIES INC	31,727.68	130.2400	67,724.80	35,997.12
541.0000	POLYCOM INC	5,042.12	12.5300	6,778.73	1,736.61
409.0000	POLYONE CORP	9,742.38	42.1400	17,235.26	7,492.88
286.0000	POOL CORP	8,196.76	56.5600	16,176.16	7,979.40
599.0000	POPULAR INC	9,326.43	34.1800	20,473.82	11,147.39
123.0000	PORTFOLIO RECOVERY ASSOCIATES	4,940.09	59.5300	7,322.19	2,382.10
197.0000	PORTLAND GENERAL ELECTRIC CO	4,934.85	34.6700	6,829.99	1,895.14
158.0000	POST HOLDINGS INC	3,763.91	50.9100	8,043.78	4,279.87
296.0000	POST PROPERTIES INC	11,644.64	53.4600	15,824.16	4,179.52
123.0000	POTLATCH CORP	4,292.70	41.4000	5,092.20	799.50
171.0000	POWER INTEGRATIONS INC	6,279.12	57.5400	9,839.34	3,560.22
1,315.0000	POZEN INC	2,948.10	8.3300	10,953.95	8,005.85
1,887.0000	PRAXAIR INC	112,252.52	132.8400	250,669.08	138,416.56



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914.0000	PRECISION CASTPARTS CORP	109,282.41	252.4000	230,693.60	121,411.19
1,887.0000	T ROWE PRICE GROUP INC	89,882.15	84.4100	159,281.67	69,399.52
258.0000	THE PRICELINE GROUP INC/THE	97,655.99	1,203.0000	310,374.00	212,718.01
693.0000	PRIMERICA INC	15,119.52	47.8500	33,160.05	18,040.53
1,345.0000	PRINCIPAL FINANCIAL GROUP INC	40,612.78	50.4800	67,895.60	27,282.82
30.0000	PROASSURANCE CORP	1,044.15	44.4000	1,332.00	287.85
14,130.0000	PROCTER & GAMBLE CO/THE	882,903.17	78.5900	1,110,476.70	227,573.53
1,146.0000	PRIVATEBANCORP INC	11,356.86	29.0600	33,302.76	21,945.90
3,056.0000	PROGRESSIVE CORP/THE	60,172.64	25.3600	77,500.16	17,327.52
2,705.0000	PROLOGIS INC	75,838.30	41.0900	111,148.45	35,310.15
579.0000	PROSPECT CAPITAL CORP	5,853.69	10.6250	6,151.88	298.19
278.0000	PROSPERITY BANCSHARES INC	11,801.10	62.6000	17,402.80	5,601.70
934.0000	PROTECTIVE LIFE CORP	20,912.26	69.3300	64,754.22	43,841.96
359.0000	PROVIDENT FINANCIAL SERVICES I	4,957.79	17.3200	6,217.88	1,260.09
2,014.0000	PRUDENTIAL FINANCIAL INC	146,328.52	88.7700	178,782.78	32,454.26
3,282.0000	PUBLIC SERVICE ENTERPRISE GROU	100,963.18	40.7900	133,872.78	32,909.60
563.0000	PUBLIC STORAGE	48,580.37	171.3500	96,470.05	47,889.68



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525.0000	PULTEGROUP INC	9,996.00	20.1600	10,584.00	588.00
2,042.0000	PZENA INVESTMENT MANAGEMENT IN	17,635.28	11.1600	22,788.72	5,153.44
1,319.0000	QEP RESOURCES INC	37,913.24	34.5000	45,505.50	7,592.26
2,037.0000	QTS REALTY TRUST INC	58,258.20	28.6300	58,319.31	61.11
9,344.0000	QUALCOMM INC	353,925.69	79.2000	740,044.80	386,119.11
311.0000	QUANEX BUILDING PRODUCTS CORP	4,948.01	17.8700	5,557.57	609.56
1,366.0000	QUANTA SERVICES INC	31,598.99	34.5800	47,236.28	15,637.29
254.0000	QUEST DIAGNOSTICS INC/DE	14,278.45	58.6900	14,907.26	628.81
151.0000	QUESTCOR PHARMACEUTICALS INC	4,877.30	92.4900	13,965.99	9,088.69
1,239.0000	QUESTAR CORP	17,824.35	24.8000	30,727.20	12,902.85
6,801.0000	RAIT FINANCIAL TRUST	52,146.20	8.2700	56,244.27	4,098.07
281.0000	RLJ LODGING TRUST	4,804.00	28.8900	8,118.09	3,314.09
44.0000	RPC INC	661.47	23.4900	1,033.56	372.09
859.0000	RPM INTERNATIONAL INC DELAWARE	24,731.52	46.1800	39,668.62	14,937.10
224.0000	RTI INTERNATIONAL METALS INC	4,948.16	26.5900	5,956.16	1,008.00
933.0000	RADIAN GROUP INC	9,665.88	14.8100	13,817.73	4,151.85
369.0000	RALPH LAUREN CORP	30,876.07	160.6900	59,294.61	28,418.54



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680.0000	RAMCO-GERSHENSON PROPERTIES TR	10,145.60	16.6200	11,301.60	1,156.00
892.0000	RANGE RESOURCES CORP	47,478.34	86.9500	77,559.40	30,081.06
186.0000	RAVEN INDUSTRIES INC	4,954.11	33.1400	6,164.04	1,209.93
609.0000	RAYMOND JAMES FINANCIAL INC	18,702.39	50.7300	30,894.57	12,192.18
51.0000	RAYONIER INC	1,577.76	35.5500	1,813.05	235.29
17.0000	RAYONIER ADVANCED MATERIALS	564.92	38.7500	658.75	93.83
1,790.0000	RAYTHEON CO	85,995.36	92.2500	165,127.50	79,132.14
394.0000	REALTY INCOME CORP	14,896.48	44.4200	17,501.48	2,605.00
148.0000	REGAL-BELOIT CORP	9,713.24	78.5600	11,626.88	1,913.64
418.0000	REGAL ENTERTAINMENT GROUP	4,928.22	21.1000	8,819.80	3,891.58
531.0000	REGENCY CENTERS CORP	21,824.10	55.6800	29,566.08	7,741.98
5,920.0000	REGIONS FINANCIAL CORP	37,763.68	10.6200	62,870.40	25,106.72
345.0000	REINSURANCE GROUP OF AMERICA I	18,554.10	78.9000	27,220.50	8,666.40
447.0000	RELIANCE STEEL & ALUMINUM CO	22,028.16	73.7100	32,948.37	10,920.21
345.0000	RENASANT CORP	4,988.70	29.0700	10,029.15	5,040.45
2,131.0000	RENTECH INC	3,324.36	2.5900	5,519.29	2,194.93
1,869.0000	REPUBLIC SERVICES INC	46,975.03	37.9700	70,965.93	23,990.90



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915.0000	RESMED INC	23,601.94	50.6300	46,326.45	22,724.51
1,736.0000	RESOURCE CAPITAL CORP	9,773.68	5.6300	9,773.68	0.00
418.0000	RESOURCES CONNECTION INC	5,082.88	13.1100	5,479.98	397.10
384.0000	RETAIL OPPORTUNITY INVESTMENTS	5,026.56	15.7300	6,040.32	1,013.76
579.0000	REXNORD HOLDINGS INC	12,280.59	28.1500	16,298.85	4,018.26
1,578.0000	REYNOLDS AMERICAN INC	54,802.51	60.3500	95,232.30	40,429.79
3,125.0000	RIGEL PHARMACEUTICALS INC	9,750.00	3.6300	11,343.75	1,593.75
227.0000	RIGNET INC	4,939.52	53.8200	12,217.14	7,277.62
670.0000	RIVERBED TECHNOLOGY INC	9,942.80	20.6300	13,822.10	3,879.30
873.0000	ROBERT HALF INTERNATIONAL INC	25,047.88	47.7400	41,677.02	16,629.14
412.0000	ROCK TENN CO	26,466.88	105.5900	43,503.08	17,036.20
1,988.0000	ROCKET FUEL INC	59,799.04	31.0900	61,806.92	2,007.88
1,004.0000	ROCKWELL AUTOMATION INC	57,591.85	125.1600	125,660.64	68,068.79
458.0000	ROCKWELL COLLINS INC	24,355.28	78.1400	35,788.12	11,432.84
298.0000	ROCKWOOD HOLDINGS INC	18,335.72	75.9900	22,645.02	4,309.30
110.0000	ROGERS CORP	4,951.10	66.3500	7,298.50	2,347.40
708.0000	ROSETTA STONE INC	5,210.88	9.7200	6,881.76	1,670.88



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139.0000	ROUSE PROPERTIES INC	1,533.17	17.1100	2,378.29	845.12
280.0000	ROVI CORP	5,056.80	23.9600	6,708.80	1,652.00
259.0000	ROYAL GOLD INC	12,589.99	76.1300	19,717.67	7,127.68
344.0000	RYDER SYSTEM INC	17,888.72	88.0900	30,302.96	12,414.24
488.0000	RYMAN HOSPITALITY PROPERTIES	13,519.13	48.1500	23,497.20	9,978.07
281.0000	S&T BANCORP INC	4,979.32	24.8500	6,982.85	2,003.53
580.0000	SBA COMMUNICATIONS CORP	21,245.40	102.3000	59,334.00	38,088.60
872.0000	SEI INVESTMENTS CO	14,640.88	32.7700	28,575.44	13,934.56
214.0000	SJW CORP	4,962.66	27.2000	5,820.80	858.14
689.0000	SL GREEN REALTY CORP	39,831.09	109.4100	75,383.49	35,552.40
3,528.0000	SLM CORP	20,584.41	8.3100	29,317.68	8,733.27
378.0000	SM ENERGY CO	24,717.42	84.1000	31,789.80	7,072.38
226.0000	SPX CORP	17,678.66	108.2100	24,455.46	6,776.80
483.0000	SP PLUS CORP	10,007.76	21.3900	10,331.37	323.61
255.0000	SVB FINANCIAL GROUP	14,614.05	116.6200	29,738.10	15,124.05
865.0000	SWS GROUP INC	4,887.25	7.2800	6,297.20	1,409.95
264.0000	SAFEGUARD SCIENTIFICS INC	4,823.28	20.7900	5,488.56	665.28



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695.0000	SAFEWAY INC	15,109.30	34.3400	23,866.30	8,757.00
352.0000	ST JOE CO/THE	5,079.36	25.4300	8,951.36	3,872.00
2,132.0000	ST JUDE MEDICAL INC	75,499.66	69.2500	147,641.00	72,141.34
3,188.0000	SALESFORCE.COM INC	101,214.62	58.0800	185,159.04	83,944.42
347.0000	SALIX PHARMACEUTICALS LTD	13,220.70	123.3500	42,802.45	29,581.75
1,458.0000	SALLY BEAUTY HOLDINGS INC	32,274.04	25.0800	36,566.64	4,292.60
109.0000	SANDERSON FARMS INC	5,261.43	97.2000	10,594.80	5,333.37
1,305.0000	SANDISK CORP	40,693.90	104.4300	136,281.15	95,587.25
2,318.0000	SANDRIDGE ENERGY INC	15,831.94	7.1500	16,573.70	741.76
276.0000	SANDY SPRING BANCORP INC	4,832.76	24.9100	6,875.16	2,042.40
1,333.0000	SANMINA CORP	12,210.93	22.7800	30,365.74	18,154.81
130.0000	SAUL CENTERS INC	4,982.90	48.6000	6,318.00	1,335.10
753.0000	SCANA CORP	27,245.81	53.8100	40,518.93	13,273.12
518.0000	HENRY SCHEIN INC	40,929.70	118.6550	61,463.29	20,533.59
7,724.0000	SCHLUMBERGER LTD	470,688.72	117.9500	911,045.80	440,357.08
194.0000	SCHOLASTIC CORP	4,834.48	34.0900	6,613.46	1,778.98
6,046.0000	CHARLES SCHWAB CORP/THE	106,820.51	26.9300	162,818.78	55,998.27



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190.0000	SCHWEITZER-MAUDUIT INTL INC	5,102.45	43.6600	8,295.40	3,192.95
165.0000	SCIENCE APPLICATIONS INTERNATI	4,839.30	44.1600	7,286.40	2,447.10
515.0000	SCIENTIFIC GAMES CORP	5,000.65	11.1200	5,726.80	726.15
98.0000	SCOTTS MIRACLE-GRO CO/THE	5,049.94	56.8600	5,572.28	522.34
1,023.0000	EW SCRIPPS CO	8,646.51	21.1600	21,646.68	13,000.17
711.0000	SCRIPPS NETWORKS INTERACTIVE I	37,400.17	81.1400	57,690.54	20,290.37
621.0000	SEACOAST BANKING CORP OF FLORI	4,685.76	10.8700	6,750.27	2,064.51
315.0000	SEACOR HOLDINGS INC	20,001.19	82.2500	25,908.75	5,907.56
899.0000	SEALED AIR CORP	19,824.16	34.1700	30,718.83	10,894.67
47.0000	SEARS CANADA INC	510.80	13.6100	639.67	128.87
886.0000	SEATTLE GENETICS INC	19,069.78	38.2500	33,889.50	14,819.72
297.0000	SELECT COMFORT CORP	4,814.37	20.6600	6,136.02	1,321.65
600.0000	SELECT MEDICAL HOLDINGS CORP	5,106.00	15.6000	9,360.00	4,254.00
321.0000	SELECTIVE INSURANCE GROUP INC	5,091.06	24.7200	7,935.12	2,844.06
190.0000	SEMGROUP CORP	4,866.93	78.8500	14,981.50	10,114.57
1,419.0000	SEMPRA ENERGY	75,395.27	104.7100	148,583.49	73,188.22
844.0000	SENIOR HOUSING PROPERTIES TRUS	19,825.56	24.2900	20,500.76	675.20



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136.0000	SENSIENT TECHNOLOGIES CORP	4,944.96	55.7200	7,577.92	2,632.96
1,420.0000	SERVICE CORP INTERNATIONAL/US	15,804.60	20.7200	29,422.40	13,617.80
581.0000	SERVICENOW INC	17,406.76	61.9600	35,998.76	18,592.00
22.0000	SHERWIN-WILLIAMS CO/THE	1,217.34	206.9100	4,552.02	3,334.68
458.0000	SHUTTERFLY INC	13,593.44	43.0600	19,721.48	6,128.04
1,061.0000	SIGMA-ALDRICH CORP	40,033.92	101.4800	107,670.28	67,636.36
246.0000	SIGNATURE BANK/NEW YORK NY	13,731.72	126.1800	31,040.28	17,308.56
2,717.0000	SIGA TECHNOLOGIES INC	6,629.48	2.8200	7,661.94	1,032.46
248.0000	SILICON LABORATORIES INC	9,936.20	49.2500	12,214.00	2,277.80
294.0000	SILGAN HOLDINGS INC	11,780.58	50.8200	14,941.08	3,160.50
202.0000	SIMMONS FIRST NATIONAL CORP	4,930.82	39.3900	7,956.78	3,025.96
1,383.0000	SIMON PROPERTY GROUP INC	117,612.85	166.2800	229,965.24	112,352.39
338.0000	SIMPLICITY BANCORP	4,912.76	17.4500	5,898.10	985.34
168.0000	SIMPSON MANUFACTURING CO INC	4,935.84	36.3600	6,108.48	1,172.64
331.0000	SIRONA DENTAL SYSTEMS INC	17,245.10	82.4600	27,294.26	10,049.16
22,009.0000	SIRIUS XM HOLDINGS INC	43,125.39	3.4600	76,151.14	33,025.75
148.0000	SIX FLAGS ENTERTAINMENT CORP	4,997.96	42.5500	6,297.40	1,299.44



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351.0000	SKECHERS U.S.A. INC	4,794.66	45.7000	16,040.70	11,246.04
4,709.0000	SKILLED HEALTHCARE GROUP INC	28,750.43	6.2900	29,619.61	869.18
1,712.0000	SKYWORKS SOLUTIONS INC	27,591.12	46.9600	80,395.52	52,804.40
912.0000	AO SMITH CORP	28,189.92	49.5800	45,216.96	17,027.04
312.0000	JM SMUCKER CO/THE	27,727.44	106.5700	33,249.84	5,522.40
159.0000	SNAP-ON INC	9,926.66	118.5200	18,844.68	8,918.02
229.0000	SNYDERS-LANCE INC	4,813.58	26.4600	6,059.34	1,245.76
934.0000	SOLAZYME INC	10,264.66	11.7800	11,002.52	737.86
10.0000	SOLARWINDS INC	248.10	38.6600	386.60	138.50
350.0000	SOLERA HOLDINGS INC	19,767.66	67.1500	23,502.50	3,734.84
375.0000	SONIC AUTOMOTIVE INC	5,231.25	26.6800	10,005.00	4,773.75
679.0000	SONOCO PRODUCTS CO	22,353.55	43.9300	29,828.47	7,474.92
174.0000	SOUTH STATE CORP	4,840.68	61.0000	10,614.00	5,773.32
4,613.0000	SOUTHERN CO	162,512.33	45.3800	209,337.94	46,825.61
304.0000	SOUTHSIDE BANCSHARES INC	5,037.30	28.9600	8,803.84	3,766.54
3,993.0000	SOUTHWEST AIRLINES CO	45,322.83	26.8600	107,251.98	61,929.15
272.0000	SOUTHWEST GAS CORP	10,194.56	52.7900	14,358.88	4,164.32



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1,881.0000	SOUTHWESTERN ENERGY CO	64,466.16	45.4900	85,566.69	21,100.53
125.0000	SOVRAN SELF STORAGE INC	4,940.00	77.2500	9,656.25	4,716.25
4,057.0000	SPECTRA ENERGY CORP	101,916.09	42.4800	172,341.36	70,425.27
363.0000	SPEEDWAY MOTORSPORTS INC	5,027.55	18.2500	6,624.75	1,597.20
1,117.0000	SPIRIT AEROSYSTEMS HOLDINGS IN	22,330.82	33.7000	37,642.90	15,312.08
415.0000	SPIRIT AIRLINES INC	4,988.47	63.2400	26,244.60	21,256.13
1,138.0000	SPIRIT RLTY CAP INC NEW	9,616.10	11.3600	12,927.68	3,311.58
511.0000	SPLUNK INC	23,506.00	55.3300	28,273.63	4,767.63
4,344.0000	SPRINT CORP	26,064.01	8.5300	37,054.32	10,990.31
1,231.0000	STANDARD PACIFIC CORP	10,057.27	8.6000	10,586.60	529.33
1,189.0000	STANLEY BLACK & DECKER INC	68,661.76	87.8200	104,417.98	35,756.22
4,373.0000	STARBUCKS CORP	149,766.06	77.3800	338,382.74	188,616.68
554.0000	STARWOOD PROPERTY TRUST INC	11,102.16	23.7700	13,168.58	2,066.42
1,045.0000	STARWOOD HOTELS & RESORTS WORL	60,180.40	80.8200	84,456.90	24,276.50
1,639.0000	STATE STREET CORP	98,029.40	67.2600	110,239.14	12,209.74
1,291.0000	STEEL DYNAMICS INC	19,704.08	17.9500	23,173.45	3,469.37
608.0000	STERICYCLE INC	39,240.40	118.4200	71,999.36	32,758.96



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319.0000	STERIS CORP	10,119.91	53.4800	17,060.12	6,940.21
669.0000	STERLING BANCORP/DE	4,890.99	12.0000	8,028.00	3,137.01
827.0000	STIFEL FINANCIAL CORP	32,320.81	47.3500	39,158.45	6,837.64
2,165.0000	STILLWATER MINING CO	18,683.95	17.5500	37,995.75	19,311.80
218.0000	STOCK YDS BANCORP INC	4,907.18	29.9000	6,518.20	1,611.02
485.0000	STONE ENERGY CORP	13,342.35	46.7900	22,693.15	9,350.80
686.0000	STONEGATE BANK	17,499.86	25.2000	17,287.20	212.66-
1,240.0000	STRATEGIC HOTELS & RESORTS INC	7,576.40	11.7100	14,520.40	6,944.00
2,023.0000	STRYKER CORP	100,586.79	84.3200	170,579.36	69,992.57
79.0000	STURM RUGER & CO INC	2,193.04	59.0100	4,661.79	2,468.75
570.0000	SUFFOLK BANCORP	5,163.35	22.3100	12,716.70	7,553.35
2,155.0000	SUN BANCORP INC/NJ	5,348.71	4.0100	8,641.55	3,292.84
131.0000	SUN COMMUNITIES INC	4,816.87	49.8400	6,529.04	1,712.17
216.0000	SUNCOKE ENERGY INC	2,608.06	21.5000	4,644.00	2,035.94
2,467.0000	SUNEDISON INC	5,304.05	22.6000	55,754.20	50,450.15
527.0000	SUNPOWER CORP	10,698.10	40.9800	21,596.46	10,898.36
1,376.0000	SUNSTONE HOTEL INVESTORS INC	11,248.26	14.9300	20,543.68	9,295.42



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2,692.0000	SUNTRUST BANKS INC	68,163.01	40.0600	107,841.52	39,678.51
835.0000	SUPERIOR ENERGY SERVICES INC	20,926.86	36.1400	30,176.90	9,250.04
2,458.0000	SUSQUEHANNA BANCSHARES INC	19,416.24	10.5600	25,956.48	6,540.24
633.0000	SWIFT TRANSPORTATION CO	9,944.43	25.2300	15,970.59	6,026.16
1,825.0000	SYMETRA FINANCIAL CORP	17,209.75	22.7400	41,500.50	24,290.75
194.0000	SYNAPTICS INC	4,855.82	90.6400	17,584.16	12,728.34
342.0000	SYNOPSIS INC	9,919.68	38.8200	13,276.44	3,356.76
1,368.0000	SYNOVUS FINANCIAL CORP	17,524.08	24.3800	33,351.84	15,827.76
130.0000	SYNNEX CORP	4,956.90	72.8500	9,470.50	4,513.60
1,037.0000	SYNUTRA INTERNATIONAL INC	4,979.47	6.7100	6,958.27	1,978.80
1,052.0000	SYSCO CORP	32,864.48	37.4500	39,397.40	6,532.92
2,163.0000	TCF FINANCIAL CORP	22,062.60	16.3700	35,408.31	13,345.71
1,514.0000	TD AMERITRADE HOLDING CORP	28,160.40	31.3500	47,463.90	19,303.50
829.0000	THL CREDIT INC	10,660.94	14.0000	11,606.00	945.06
2,255.0000	TJX COS INC	32,159.68	53.1500	119,853.25	87,693.57
976.0000	T-MOBILE US INC	16,693.61	33.6200	32,813.12	16,119.51
468.0000	TRW AUTOMOTIVE HOLDINGS CORP	24,565.32	89.5200	41,895.36	17,330.04



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985.0000	TW TELECOM INC	16,262.35	40.3100	39,705.35	23,443.00
437.0000	TAKE-TWO INTERACTIVE SOFTWARE	6,471.97	22.2400	9,718.88	3,246.91
183.0000	TANGER FACTORY OUTLET CENTERS	4,884.27	34.9700	6,399.51	1,515.24
2,701.0000	TARGET CORP	151,201.71	57.9500	156,522.95	5,321.24
82.0000	TARGA RESOURCES CORP	4,948.70	139.5700	11,444.74	6,496.04
186.0000	TAUBMAN CENTERS INC	7,456.74	75.8100	14,100.66	6,643.92
223.0000	TEAM INC	4,995.20	41.0200	9,147.46	4,152.26
231.0000	TEAM HEALTH HOLDINGS INC	5,128.20	49.9400	11,536.14	6,407.94
277.0000	TECH DATA CORP	12,772.47	62.5200	17,318.04	4,545.57
203.0000	TECHNE CORP	14,837.10	92.5700	18,791.71	3,954.61
102.0000	TELEDYNE TECHNOLOGIES INC	4,876.62	97.1700	9,911.34	5,034.72
144.0000	TELEFLEX INC	9,796.02	105.6000	15,206.40	5,410.38
549.0000	TELEPHONE & DATA SYS INC	12,974.99	26.1100	14,334.39	1,359.40
388.0000	TEMPUR SEALY INTERNATIONAL INC	15,357.04	59.7000	23,163.60	7,806.56
816.0000	TENET HEALTHCARE CORP	17,538.47	46.9400	38,303.04	20,764.57
106.0000	TENNANT CO	4,983.06	76.3200	8,089.92	3,106.86
671.0000	TENNECO INC	18,150.55	65.7000	44,084.70	25,934.15



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1,170.0000	TERADYNE INC	16,169.40	19.6000	22,932.00	6,762.60
556.0000	TEREX CORP	14,190.44	41.1000	22,851.60	8,661.16
2,392.0000	TERRENO REALTY CORP	42,955.92	19.3300	46,237.36	3,281.44
532.0000	TESLA MOTORS INC	13,068.12	240.0600	127,711.92	114,643.80
437.0000	TESORO CORP	9,526.60	58.6700	25,638.79	16,112.19
370.0000	TETRA TECH INC	8,376.80	27.5000	10,175.00	1,798.20
265.0000	TESSERA TECHNOLOGIES INC	4,285.05	22.0800	5,851.20	1,566.15
6,703.0000	TEXAS INSTRUMENTS INC	224,786.44	47.7900	320,336.37	95,549.93
1,348.0000	TEXTRON INC	37,364.20	38.2900	51,614.92	14,250.72
410.0000	THERAVANCE INC	8,712.50	29.7800	12,209.80	3,497.30
2,463.0000	THERMO FISHER SCIENTIFIC INC	96,870.50	118.0000	290,634.00	193,763.50
2,141.0000	THOMSON REUTERS CORP	63,006.26	36.3600	77,846.76	14,840.50
264.0000	THOR INDUSTRIES INC	6,293.76	56.8700	15,013.68	8,719.92
527.0000	THORATEC CORP	14,861.40	34.8600	18,371.22	3,509.82
457.0000	3D SYSTEMS CORP	15,519.99	59.8000	27,328.60	11,808.61
3,884.0000	3M CO	290,663.36	143.2400	556,344.16	265,680.80
203.0000	TIDEWATER INC	9,728.49	56.1500	11,398.45	1,669.96



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909.0000	TIFFANY & CO	30,437.86	100.2500	91,127.25	60,689.39
3,883.0000	TILLY'S INC	31,266.30	8.0400	31,219.32	46.98-
697.0000	TIME INC	8,393.70	24.2200	16,881.34	8,487.64
5,583.0000	TIME WARNER INC	203,818.16	70.2500	392,205.75	188,387.59
1,678.0000	TIME WARNER CABLE INC	92,836.00	147.3000	247,169.40	154,333.40
388.0000	TIMKEN CO	18,232.12	67.8400	26,321.92	8,089.80
1,484.0000	TIVO INC	18,342.24	12.9100	19,158.44	816.20
1,241.0000	TOLL BROTHERS INC	27,612.41	36.9000	45,792.90	18,180.49
130.0000	TOMPKINS FINANCIAL CORP	5,062.20	48.1800	6,263.40	1,201.20
546.0000	TORCHMARK CORP	22,753.64	81.9200	44,728.32	21,974.68
368.0000	TORO CO/THE	10,992.16	63.6000	23,404.80	12,412.64
341.0000	TOWERS WATSON & CO	21,500.05	104.2300	35,542.43	14,042.38
891.0000	TOTAL SYSTEM SERVICES INC	19,795.33	31.4100	27,986.31	8,190.98
249.0000	TOWNEBANK/PORTSMOUTH VA	3,215.24	15.7100	3,911.79	696.55
466.0000	TRACTOR SUPPLY CO	15,126.36	60.4000	28,146.40	13,020.04
57.0000	TRANSDIGM GROUP INC	4,891.17	167.2600	9,533.82	4,642.65
2,089.0000	TRAVELERS COS INC/THE	97,118.23	94.0700	196,512.23	99,394.00



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85.0000	TREEHOUSE FOODS INC	4,606.15	80.0700	6,805.95	2,199.80
2.0000	TREX CO INC	25.86	28.8200	57.64	31.78
273.0000	TRIANGLE CAPITAL CORP	5,121.48	28.3700	7,745.01	2,623.53
2,570.0000	TRIANGLE PETE CORP COM NEW	22,836.51	11.7500	30,197.50	7,360.99
422.0000	TRICO BANCSHARES	6,055.70	23.1400	9,765.08	3,709.38
1,458.0000	TRIMBLE NAVIGATION LTD	27,024.03	36.9500	53,873.10	26,849.07
1,302.0000	TRINITY INDUSTRIES INC	20,446.03	43.7200	56,923.44	36,477.41
2,368.0000	TRIQUINT SEMICONDUCTOR INC	11,295.36	15.8100	37,438.08	26,142.72
102.0000	TRIUMPH GROUP INC	4,904.16	69.8200	7,121.64	2,217.48
738.0000	TRIPADVISOR INC	26,854.75	108.6600	80,191.08	53,336.33
2,875.0000	TRUECAR INC	38,237.50	14.7800	42,492.50	4,255.00
345.0000	TRUEBLUE INC	5,023.20	27.5700	9,511.65	4,488.45
326.0000	TRULIA INC	10,011.46	47.3800	15,445.88	5,434.42
150.0000	TRUSTMARK CORP	3,406.50	24.6900	3,703.50	297.00
634.0000	TUMI HOLDINGS INC	12,768.76	20.1300	12,762.42	6.34-
314.0000	TUPPERWARE BRANDS CORP	14,974.66	83.7000	26,281.80	11,307.14
11,511.0000	TWENTY FIRST CENTURY FOX INC	197,630.29	35.1500	404,611.65	206,981.36



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775.0000	TWO HARBORS INVESTMENT CORP	8,052.25	10.4800	8,122.00	69.75
86.0000	TYLER TECHNOLOGIES INC	4,999.18	91.2100	7,844.06	2,844.88
2,341.0000	TYSON FOODS INC	38,390.95	37.5400	87,881.14	49,490.19
1,181.0000	UDR INC	26,938.61	28.6300	33,812.03	6,873.42
191.0000	UGI CORP	5,970.66	50.5000	9,645.50	3,674.84
190.0000	UMB FINANCIAL CORP	7,607.60	63.3900	12,044.10	4,436.50
4,906.0000	US BANCORP	147,589.55	43.3200	212,527.92	64,938.37
136.0000	UNS ENERGY CORP	4,968.08	60.4100	8,215.76	3,247.68
537.0000	URS CORP	22,231.80	45.8500	24,621.45	2,389.65
183.0000	USANA HEALTH SCIENCES INC	14,231.91	78.1400	14,299.62	67.71
378.0000	USG CORP	9,869.58	30.1300	11,389.14	1,519.56
412.0000	US SILICA HOLDINGS INC	4,865.72	55.4400	22,841.28	17,975.56
269.0000	ULTA SALON COSMETICS & FRAGRAN	16,901.27	91.4100	24,589.29	7,688.02
269.0000	ULTIMATE SOFTWARE GROUP INC	23,379.35	138.1700	37,167.73	13,788.38
580.0000	ULTRA PETROLEUM CORP	9,816.35	29.6900	17,220.20	7,403.85
2,104.0000	UMPQUA HOLDINGS CORP	22,409.37	17.9200	37,703.68	15,294.31
1,442.0000	UNDER ARMOUR INC	29,839.82	59.4900	85,784.58	55,944.76



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97.0000	UNIFIRST CORP/MA	4,938.27	106.0000	10,282.00	5,343.73
802.0000	UNION BANKSHARES CORP	9,587.27	25.6500	20,571.30	10,984.03
3,830.0000	UNION PACIFIC CORP	83,603.92	99.7500	382,042.50	298,438.58
100.0000	UNIT CORP	4,463.00	68.8300	6,883.00	2,420.00
773.0000	UNITED COMMUNITY BANKS	5,094.07	16.3700	12,654.01	7,559.94
259.0000	UNITED BANKSHARES INC	6,081.32	32.3300	8,373.47	2,292.15
1,786.0000	UNITED CONTINENTAL HOLDINGS IN	43,910.33	41.0700	73,351.02	29,440.69
942.0000	UNITED FINL BANCORP INC	9,977.00	13.5500	12,764.10	2,787.10
277.0000	UNITED FIRE GROUP INC	4,855.81	29.3200	8,121.64	3,265.83
322.0000	UNITED NATURAL FOODS INC	14,770.35	65.1000	20,962.20	6,191.85
118.0000	UNITED ONLINE INC	1,015.05	10.4000	1,227.20	212.15
3,801.0000	UNITED PARCEL SERVICE INC	278,382.65	102.6600	390,210.66	111,828.01
792.0000	UNITED RENTALS INC	27,525.38	104.7300	82,946.16	55,420.78
469.0000	UNITED STATES STEEL CORP	9,824.69	26.0400	12,212.76	2,388.07
194.0000	UNITED STATIONERS INC	6,613.46	41.4700	8,045.18	1,431.72
5,062.0000	UNITED TECHNOLOGIES CORP	322,349.67	115.4500	584,407.90	262,058.23
551.0000	UNITED THERAPEUTICS CORP	25,058.23	88.4900	48,757.99	23,699.76



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5,626.0000	UNITEDHEALTH GROUP INC	279,191.70	81.7500	459,925.50	180,733.80
537.0000	UNITIL CORP	14,936.01	33.8300	18,166.71	3,230.70
184.0000	UNIVERSAL FOREST PRODUCTS INC	4,852.08	48.2700	8,881.68	4,029.60
410.0000	UNIVERSAL HEALTH SERVICES INC	24,507.64	95.7600	39,261.60	14,753.96
2,186.0000	UNUM GROUP	42,790.29	34.7600	75,985.36	33,195.07
477.0000	URBAN OUTFITTERS INC	14,707.10	33.8600	16,151.22	1,444.12
228.0000	VCA INC	5,002.32	35.0900	8,000.52	2,998.20
1,656.0000	VF CORP	63,042.34	63.0000	104,328.00	41,285.66
185.0000	VSE CORP	4,713.80	70.3200	13,009.20	8,295.40
684.0000	VOXX INTERNATIONAL CORP	5,034.24	9.4100	6,436.44	1,402.20
208.0000	VAIL RESORTS INC	9,195.68	77.1800	16,053.44	6,857.76
2,660.0000	VALERO ENERGY CORP	76,679.49	50.1000	133,266.00	56,586.51
237.0000	VALMONT INDUSTRIES INC	25,810.98	151.9500	36,012.15	10,201.17
140.0000	VALSPAR CORP/THE	5,037.20	76.1900	10,666.60	5,629.40
1,440.0000	VALUEVISION MEDIA INC	3,067.20	4.9900	7,185.60	4,118.40
370.0000	VANTIV INC	10,019.60	33.6200	12,439.40	2,419.80
1,001.0000	VARIAN MEDICAL SYSTEMS INC	48,553.51	83.1400	83,223.14	34,669.63



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479.0000	VENTAS INC	18,353.09	64.1000	30,703.90	12,350.81
1,228.0000	VERISIGN INC	28,911.05	48.8100	59,938.68	31,027.63
17,740.0000	VERIZON COMMUNICATIONS INC	626,770.29	48.9300	868,018.20	241,247.91
145.0000	VERINT SYSTEMS INC	5,067.75	49.0500	7,112.25	2,044.50
740.0000	VERISK ANALYTICS INC	36,444.00	60.0200	44,414.80	7,970.80
1,453.0000	VERTEX PHARMACEUTICALS INC	59,912.40	94.6800	137,570.04	77,657.64
117.0000	VIASAT INC	4,891.77	57.9600	6,781.32	1,889.55
3,187.0000	VIACOM INC	119,021.39	86.7300	276,408.51	157,387.12
367.0000	VIEWPOINT FINANCIAL GROUP INC	4,965.51	26.9100	9,875.97	4,910.46
2,492.0000	VISA INC	222,092.40	210.7100	525,089.32	302,996.92
1,523.0000	VISHAY INTERTECHNOLOGY INC	14,377.12	15.4900	23,591.27	9,214.15
85.0000	VISTEON CORP/NEW	4,961.45	97.0100	8,245.85	3,284.40
11,346.0000	VIVUS INC	59,339.58	5.3200	60,360.72	1,021.14
304.0000	VLASIC FOODS INTL INC COM	3,211.50	10.5641	3,211.50	0.00
170.0000	VMWARE INC	15,084.55	96.8100	16,457.70	1,373.15
5,930.0000	VONAGE HOLDINGS CORP	11,207.70	3.7500	22,237.50	11,029.80
333.0000	VORNADO REALTY TRUST	27,618.09	106.7300	35,541.09	7,923.00



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3,344.0000	VRINGO INC	10,032.00	3.4200	11,436.48	1,404.48
664.0000	VULCAN MATERIALS CO	36,410.98	63.7500	42,330.00	5,919.02
90.0000	WD-40 CO	4,888.80	75.2200	6,769.80	1,881.00
132.0000	WGL HOLDINGS INC	4,971.12	43.1000	5,689.20	718.08
213.0000	WABCO HOLDINGS INC	14,611.56	106.8200	22,752.66	8,141.10
128.0000	WSFS FINANCIAL CORP	4,825.60	73.6700	9,429.76	4,604.16
1,221.0000	WABASH NATIONAL CORP	10,036.73	14.2500	17,399.25	7,362.52
102.0000	WABTEC CORP/DE	5,002.59	82.5900	8,424.18	3,421.59
122.0000	WADDELL & REED FINANCIAL INC	4,976.38	62.5900	7,635.98	2,659.60
8,273.0000	WAL-MART STORES INC	410,662.61	75.0700	621,054.11	210,391.50
5,159.0000	WALGREEN CO	231,206.67	74.1300	382,436.67	151,230.00
1,708.0000	WALTER INVESTMENT MANAGEMENT C	50,437.24	29.7800	50,864.24	427.00
664.0000	WASHINGTON FEDERAL INC	13,638.56	22.4300	14,893.52	1,254.96
691.0000	WASHINGTON PRIME GROUP INC	7,332.12	18.7400	12,949.34	5,617.22
218.0000	WASHINGTON TRUST BANCORP INC	4,848.32	36.7700	8,015.86	3,167.54
675.0000	WASTE CONNECTIONS INC	21,100.50	48.5500	32,771.25	11,670.75
816.0000	WASTE MANAGEMENT INC	29,318.88	44.7300	36,499.68	7,180.80



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95.0000	WATERS CORP	8,628.85	104.4400	9,921.80	1,292.95
70.0000	WATSCO INC	5,804.40	102.7600	7,193.20	1,388.80
149.0000	WATTS WATER TECHNOLOGIES INC	4,936.37	61.7300	9,197.77	4,261.40
784.0000	WAUSAU PAPER CORP	5,080.32	10.8200	8,482.88	3,402.56
427.0000	WEB.COM GROUP INC	10,410.26	28.8700	12,327.49	1,917.23
696.0000	WEBSTER FINANCIAL CORP	13,671.32	31.5400	21,951.84	8,280.52
780.0000	WEINGARTEN REALTY INVESTORS	18,166.20	32.8400	25,615.20	7,449.00
130.0000	WEIS MARKETS INC	4,803.50	45.7300	5,944.90	1,141.40
253.0000	WELLCARE HEALTH PLANS INC	12,419.77	74.6600	18,888.98	6,469.21
1,052.0000	WELLPOINT INC	74,878.16	107.6100	113,205.72	38,327.56
27,540.0000	WELLS FARGO & CO	962,971.98	52.5600	1,447,502.40	484,530.42
3,177.0000	WENDYS CO	14,804.82	8.5300	27,099.81	12,294.99
261.0000	WESBANCO INC	4,909.41	31.0400	8,101.44	3,192.03
551.0000	WESCO INTERNATIONAL INC	19,494.38	86.3800	47,595.38	28,101.00
164.0000	WEST PHARMACEUTICAL SERVICES I	4,991.34	42.1800	6,917.52	1,926.18
648.0000	WESTAR ENERGY INC	19,968.29	38.1900	24,747.12	4,778.83
73.0000	WESTAMERICA BANCORPORATION	3,513.49	52.2800	3,816.44	302.95



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729.0000	WESTERN ALLIANCE BANCORP	4,891.59	23.8000	17,350.20	12,458.61
3,984.0000	WESTERN ASSET MORTGAGE CAPITAL	56,572.80	14.1700	56,453.28	119.52-
1,445.0000	WESTERN DIGITAL CORP	39,510.05	92.3000	133,373.50	93,863.45
313.0000	WESTERN REFINING INC	5,086.25	37.5500	11,753.15	6,666.90
472.0000	WESTLAKE CHEMICAL CORP	18,799.76	83.7600	39,534.72	20,734.96
135.0000	WESTWOOD HOLDINGS GROUP INC	4,885.65	60.0400	8,105.40	3,219.75
229.0000	WEX INC	11,216.42	104.9700	24,038.13	12,821.71
3,383.0000	WEYERHAEUSER CO	52,587.26	33.0900	111,943.47	59,356.21
456.0000	WHIRLPOOL CORP	38,710.06	139.2200	63,484.32	24,774.26
390.0000	WHITESTONE REIT	4,952.06	14.9100	5,814.90	862.84
674.0000	WHITEWAVE FOODS CO	6,877.98	32.3700	21,817.38	14,939.40
742.0000	WHITING PETROLEUM CORP	35,381.80	80.2500	59,545.50	24,163.70
1,188.0000	WHOLE FOODS MARKET INC	36,596.57	38.6300	45,892.44	9,295.87
1,425.0000	WILLBROS GROUP INC	5,157.93	12.3500	17,598.75	12,440.82
3,714.0000	WILLIAMS COS INC/THE	72,275.21	58.2100	216,191.94	143,916.73
553.0000	WILLIAMS-SONOMA INC	19,887.91	71.7800	39,694.34	19,806.43
393.0000	WINTHROP REALTY TRUST	4,995.03	15.3500	6,032.55	1,037.52



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390.0000	WINTRUST FINANCIAL CORP	11,633.70	46.0000	17,940.00	6,306.30
2,107.0000	WISCONSIN ENERGY CORP	46,987.17	46.9200	98,860.44	51,873.27
248.0000	WOLVERINE WORLD WIDE INC	5,023.24	26.0600	6,462.88	1,439.64
365.0000	WOODWARD INC	11,815.05	50.1800	18,315.70	6,500.65
94.0000	WORLD ACCEPTANCE CORP	5,884.40	75.9600	7,140.24	1,255.84
227.0000	WORLD FUEL SERVICES CORP	7,792.91	49.2300	11,175.21	3,382.30
342.0000	WORTHINGTON INDUSTRIES INC	6,730.56	43.0400	14,719.68	7,989.12
1,286.0000	WPX ENERGY INC	16,859.82	23.9100	30,748.26	13,888.44
341.0000	WRIGHT MEDICAL GROUP INC	4,934.27	31.4000	10,707.40	5,773.13
1,045.0000	WYNDHAM WORLDWIDE CORP	37,612.05	75.7200	79,127.40	41,515.35
295.0000	WYNN RESORTS LTD	33,810.89	207.5600	61,230.20	27,419.31
1,681.0000	XILINX INC	42,184.00	47.3100	79,528.11	37,344.11
6,444.0000	XEROX CORP	52,247.88	12.4400	80,163.36	27,915.48
1,230.0000	XYLEM INC/NY	33,095.58	39.0800	48,068.40	14,972.82
2,312.0000	XOOM CORP	60,320.08	26.3600	60,944.32	624.24
1,702.0000	YRC WORLDWIDE INC	47,894.28	28.1100	47,843.22	51.06-
4,237.0000	YAHOO! INC	94,396.81	35.1300	148,845.81	54,449.00



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322.0000	YELP INC	11,231.36	76.6800	24,690.96	13,459.60
503.0000	YORK WATER CO	8,910.09	20.8200	10,472.46	1,562.37
1,359.0000	YUM! BRANDS INC	35,769.35	81.2000	110,350.80	74,581.45
6,927.0000	YUME INC	40,730.76	5.9000	40,869.30	138.54
745.0000	ZEBRA TECHNOLOGIES CORP	22,305.30	82.3200	61,328.40	39,023.10
178.0000	ZILLOW INC	9,994.70	142.9300	25,441.54	15,446.84
1,273.0000	ZIMMER HOLDINGS INC	82,469.56	103.8600	132,213.78	49,744.22
1,713.0000	ZIONS BANCORPORATION	26,568.63	29.4700	50,482.11	23,913.48
1,465.0000	ZULILY INC	56,688.03	40.9500	59,991.75	3,303.72
2,994.0000	ZOGENIX INC	5,080.22	2.0100	6,017.94	937.72
3,400.0000	ZYNGA INC	8,364.00	3.2100	10,914.00	2,550.00
730.0000	GYRODYNE CO OF AMERICA INC 2	0.00	0.0000	0.00	0.00
67.0000	GYRODYNE SPECIAL DIST LLC	0.00	0.0000	0.00	0.00
TOTAL INVESTMENTS EQUITY		63,358,534.02		111,637,171.89	48,278,637.87
TOTAL INVESTMENT		63,624,402.39		111,903,040.26	48,278,637.87



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<u>INVESTMENTS CASH EQUIVALENTS</u>					
1,237,918.2400	FIDELITY INSTL MM PRIME 690	1,237,918.24	100.0000	1,237,918.24	0.00
TOTAL INVESTMENTS CASH EQUIVALENTS		1,237,918.24		1,237,918.24	0.00
<u>INVESTMENTS FIXED INCOME SECURITIES</u>					
100,000.0000	ACCO BRANDS CORP 6.750% 04/30/2020 DD 04/30/13	100,000.00	104.7500	104,750.00	4,750.00
150,000.0000	ADS WASTE HOLDINGS INC 8.250% 10/01/2020 DD 10/01/13	154,464.46	107.7500	161,625.00	7,160.54
150,000.0000	AES CORP/VA 4.875% 05/15/2023 DD 04/30/13	152,724.27	99.0000	148,500.00	4,224.27-
100,000.0000	AFFINIA GROUP INC 7.750% 05/01/2021 DD 11/01/13	102,313.99	105.2500	105,250.00	2,936.01
90,000.0000	AMHG MERGER SUB INC 9.250% 11/01/2018 DD 10/22/10	90,000.00	106.5000	95,850.00	5,850.00
175,000.0000	ALLIANCE DATA SYSTEMS COR 144A 6.375% 04/01/2020 DD 03/29/12	176,067.81	106.5000	186,375.00	10,307.19
100,000.0000	ALLIANCE DATA SYSTEMS COR 144A 5.250% 12/01/2017 DD 11/20/12	103,765.37	104.5000	104,500.00	734.63
141,000.0000	ALLISON TRANSMISSION INC 144A 7.125% 05/15/2019 DD 05/06/11	146,841.39	107.0000	150,870.00	4,028.61



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150,000.0000	ALPHABET HOLDING CO INC 7.750% 11/01/2017 DD 05/01/13	154,305.91	103.2500	154,875.00	569.09
100,000.0000	AMERICAN AXLE & MANUFACTURING 6.250% 03/15/2021 DD 02/28/13	105,639.28	107.5000	107,500.00	1,860.72
150,000.0000	AMERICAN BUILDERS & CONTR 144A 5.625% 04/15/2021 DD 04/16/13	150,518.23	103.5000	155,250.00	4,731.77
250,000.0000	AMERISTAR CASINOS INC 7.500% 04/15/2021 DD 10/15/11	255,063.29	107.7500	269,375.00	14,311.71
125,000.0000	AMERIGAS FINANCE LLC / AMERIGA 7.000% 05/20/2022 DD 01/12/12	125,000.00	110.7500	138,437.50	13,437.50
250,000.0000	ANCESTRY.COM INC 144A 9.625% 10/15/2018 DD 09/17/13	256,949.42	103.3750	258,437.50	1,488.08
275,000.0000	ARCELORMITTAL VAR RT 03/01/2021 DD 03/07/11	286,541.69	108.2500	297,687.50	11,145.81
150,000.0000	ATKORE 4/14 COV-LITE TL	149,270.95	99.9170	149,875.50	604.55
150,000.0000	ATWOOD OCEANICS INC 6.500% 02/01/2020 DD 01/18/12	155,520.74	106.6250	159,937.50	4,416.76
150,000.0000	BERRY PETROLEUM CO 6.750% 11/01/2020 DD 11/01/10	159,488.47	105.2500	157,875.00	1,613.47-
150,000.0000	BI-LO LLC / BI-LO FINANCE 144A 8.625% 09/15/2018 DD 09/20/13	149,844.01	101.5000	152,250.00	2,405.99
150,000.0000	BIOMET INC 6.500% 10/01/2020 DD 04/01/13	152,090.81	106.7500	160,125.00	8,034.19



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125,000.0000	BOMBARDIER INC 144A 6.125% 01/15/2023 DD 01/14/13	125,000.00	103.0000	128,750.00	3,750.00
150,000.0000	BRAND ENERGY & INFRASTRUC 144A 8.500% 12/01/2021 DD 11/26/13	150,000.00	106.7500	160,125.00	10,125.00
100,000.0000	CCO HOLDINGS LLC / CCO HOLDING 6.500% 04/30/2021 DD 05/10/11	105,698.60	106.5000	106,500.00	801.40
125,000.0000	CCO HOLDINGS LLC / CCO HOLDING 6.625% 01/31/2022 DD 01/26/12	125,260.52	107.5000	134,375.00	9,114.48
50,000.0000	CCO HOLDINGS LLC / CCO HOLDING 5.125% 02/15/2023 DD 12/17/12	50,000.00	100.8750	50,437.50	437.50
300,000.0000	CBS OUTDOOR AMERICAS CAPI 144A 5.625% 02/15/2024 DD 01/31/14	300,000.00	103.2500	309,750.00	9,750.00
150,000.0000	CDW LLC / CDW FINANCE CORP 8.500% 04/01/2019 DD 10/01/11	153,609.50	108.2500	162,375.00	8,765.50
200,000.0000	CGG SA 144A 6.875% 01/15/2022 DD 05/01/14	200,000.00	99.7500	199,500.00	500.00-
150,000.0000	CHS/COMMUNITY HEALTH SYSTEMS I 8.000% 11/15/2019 DD 05/15/12	158,349.77	109.5000	164,250.00	5,900.23
100,000.0000	CHS/COMMUNITY HEALTH SYSTEMS I 5.125% 08/15/2018 DD 08/17/12	103,714.06	104.8750	104,875.00	1,160.94
250,000.0000	CSC HOLDINGS LLC 144A 5.250% 06/01/2024 DD 05/23/14	250,000.00	98.3750	245,937.50	4,062.50-



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100,000.0000	CABLEVISION SYSTEMS CORP 7.750% 04/15/2018 DD 04/15/10	100,318.51	113.0000	113,000.00	12,681.49
67,000.0000	CALPINE CORP 144A 7.875% 07/31/2020 DD 07/23/10	69,513.22	108.5000	72,695.00	3,181.78
100,000.0000	CASCADES INC 7.875% 01/15/2020 DD 12/23/09	100,886.09	106.2500	106,250.00	5,363.91
150,000.0000	CATALENT PHARMA SOLUTIONS INC 7.875% 10/15/2018 DD 04/15/13	150,179.05	101.7500	152,625.00	2,445.95
150,000.0000	CENTRAL GARDEN AND PET CO 8.250% 03/01/2018 DD 03/08/10	151,817.88	103.7500	155,625.00	3,807.12
275,000.0000	CENTURYLINK INC 5.800% 03/15/2022 DD 03/12/12	282,153.88	104.1250	286,343.75	4,189.87
175,000.0000	CEQUEL COMMUNICATIONS HOL 144A 6.375% 09/15/2020 DD 10/25/12	179,388.27	106.2500	185,937.50	6,549.23
150,000.0000	CHEMTURA CORP 5.750% 07/15/2021 DD 07/23/13	151,054.23	103.7500	155,625.00	4,570.77
100,000.0000	CINCINNATI BELL INC 8.750% 03/15/2018 DD 03/15/10	100,764.70	104.8750	104,875.00	4,110.30
100,000.0000	FRONTIER COMMUNICATIONS CORP 7.125% 03/15/2019 DD 03/23/07	108,301.68	113.5000	113,500.00	5,198.32
100,000.0000	CLEAN HARBORS INC 5.250% 08/01/2020 DD 07/30/12	100,029.67	103.1250	103,125.00	3,095.33



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100,000.0000	CLEAN HARBORS INC 5.125% 06/01/2021 DD 12/07/12	100,162.29	102.1880	102,188.00	2,025.71
150,000.0000	CLEAR CHANNEL WORLDWIDE HOLDIN 7.625% 03/15/2020 DD 03/15/12	156,521.54	107.8750	161,812.50	5,290.96
100,000.0000	COMMSCOPE HOLDING CO INC 144A 6.625% 06/01/2020 DD 05/28/13	100,000.00	106.7500	106,750.00	6,750.00
84,000.0000	CIE GENERALE DE GEOPHYSIQUE - 7.750% 05/15/2017 DD 02/09/07	83,958.64	101.5000	85,260.00	1,301.36
200,000.0000	COVANTA HOLDING CORP 5.875% 03/01/2024 DD 03/06/14	204,972.82	103.3750	206,750.00	1,777.18
175,000.0000	CYRUSONE LP / CYRUSONE FINANCE 6.375% 11/15/2022 DD 05/15/13	176,133.84	107.7500	188,562.50	12,428.66
175,000.0000	DAVITA HEALTHCARE PARTNERS INC 6.625% 11/01/2020 DD 10/20/10	175,233.47	106.2500	185,937.50	10,704.03
125,000.0000	DAVITA HEALTHCARE PARTNERS INC 5.750% 08/15/2022 DD 08/28/12	127,773.91	106.8750	133,593.75	5,819.84
150,000.0000	DENBURY RESOURCES INC 4.625% 07/15/2023 DD 02/05/13	150,000.00	97.0210	145,531.50	4,468.50-
100,000.0000	DIAMONDBACK ENERGY INC 144A 7.625% 10/01/2021 DD 09/18/13	100,000.00	110.0000	110,000.00	10,000.00
200,000.0000	DISH DBS CORP 7.875% 09/01/2019 DD 08/17/09	201,873.20	118.7500	237,500.00	35,626.80



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75,000.0000	DISH DBS CORP 6.750% 06/01/2021 DD 05/05/11	77,417.04	114.0000	85,500.00	8,082.96
100,000.0000	DISH DBS CORP 5.000% 03/15/2023 DD 12/27/12	101,861.53	101.8750	101,875.00	13.47
150,000.0000	DOLE FOOD CO INC 144A 7.250% 05/01/2019 DD 11/01/13	150,704.02	101.2500	151,875.00	1,170.98
300,000.0000	RR DONNELLEY & SONS CO 7.000% 02/15/2022 DD 08/26/13	314,552.08	110.2500	330,750.00	16,197.92
200,000.0000	DUFYR FINANCE SCA 144A 5.500% 10/15/2020 DD 10/26/12	200,000.00	103.8310	207,662.00	7,662.00
150,000.0000	ENDO FINANCE LLC 144A 5.750% 01/15/2022 DD 12/19/13	150,000.00	102.0000	153,000.00	3,000.00
150,000.0000	ENDO FINANCE LLC & ENDO F 144A 7.000% 07/15/2019 DD 05/06/14	162,780.88	106.8750	160,312.50	2,468.38-
150,000.0000	ENERGY TRANSFER EQUITY 144A 5.875% 01/15/2024 DD 12/02/13	152,977.55	104.5000	156,750.00	3,772.45
150,000.0000	ENTEGRIS INC 144A 6.000% 04/01/2022 DD 04/01/14	150,000.00	103.0000	154,500.00	4,500.00
148,749.0000	EXGEN 2/14 HOLDCO TL 0.000% 02/05/2021 DD 01/22/14	148,045.73	101.3750	150,794.30	2,748.57
175,000.0000	EXTERRAN HOLDINGS INC 7.250% 12/01/2018 DD 12/01/11	175,000.00	105.5000	184,625.00	9,625.00



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225,000.0000	FMG RESOURCES AUGUST 2006 144A 8.250% 11/01/2019 DD 10/28/11	239,648.95	108.8750	244,968.75	5,319.80
150,000.0000	FTI CONSULTING INC 6.000% 11/15/2022 DD 05/15/13	150,000.00	102.8750	154,312.50	4,312.50
175,000.0000	FELCOR LODGING LP 5.625% 03/01/2023 DD 03/01/13	175,000.00	103.0000	180,250.00	5,250.00
150,000.0000	FIRST QUALITY FINANCE CO 144A 4.625% 05/15/2021 DD 05/14/13	150,000.00	94.5000	141,750.00	8,250.00-
100,000.0000	FRESENIUS MEDICAL CARE US 144A 5.875% 01/31/2022 DD 01/26/12	100,000.00	110.5000	110,500.00	10,500.00
150,000.0000	FRONTIER COMMUNICATIONS CORP 8.500% 04/15/2020 DD 04/12/10	155,208.52	118.0000	177,000.00	21,791.48
175,000.0000	GEO GROUP INC/THE 6.625% 02/15/2021 DD 08/15/11	175,000.00	107.2500	187,687.50	12,687.50
200,000.0000	GARDA WORLD SECURITY CORP 144A 7.250% 11/15/2021 DD 11/08/13	205,464.26	105.1250	210,250.00	4,785.74
150,000.0000	GATES GLOBAL LLC 144A 6.000% 07/15/2022 DD 06/26/14	150,000.00	100.0000	150,000.00	0.00
175,000.0000	GIBSON ENERGY INC 144A 6.750% 07/15/2021 DD 06/28/13	172,597.36	108.2500	189,437.50	16,840.14
100,000.0000	GOODYEAR TIRE & RUBBER CO/THE 8.250% 08/15/2020 DD 08/13/10	108,887.20	109.7500	109,750.00	862.80



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175,000.0000	GOODYEAR TIRE & RUBBER CO/THE 6.500% 03/01/2021 DD 02/25/13	176,040.15	108.5000	189,875.00	13,834.85
150,000.0000	GRAY TELEVISION INC 7.500% 10/01/2020 DD 10/09/12	157,537.61	107.7500	161,625.00	4,087.39
175,000.0000	GRIFFEY INTERMEDIATE INC 144A 7.000% 10/15/2020 DD 10/18/12	175,880.24	91.6250	160,343.75	15,536.49-
200,000.0000	GROUP 1 AUTOMOTIVE INC 5.000% 06/01/2022 DD 06/02/14	200,000.00	100.0000	200,000.00	0.00
125,000.0000	GULFMARK OFFSHORE INC 6.375% 03/15/2022 DD 09/15/12	125,735.82	104.0000	130,000.00	4,264.18
100,000.0000	HCA INC 6.375% 01/15/2015 DD 11/19/04	99,797.88	102.3750	102,375.00	2,577.12
100,000.0000	HCA HOLDINGS INC 7.750% 05/15/2021 DD 11/15/11	102,284.85	109.6250	109,625.00	7,340.15
100,000.0000	HCA INC 7.500% 02/15/2022 DD 08/01/11	100,000.00	115.3750	115,375.00	15,375.00
200,000.0000	HD SUPPLY INC 7.500% 07/15/2020 DD 10/15/13	214,011.69	109.2500	218,500.00	4,488.31
200,000.0000	HILLMAN GROUP INC 144A 6.375% 07/15/2022 DD 06/30/14	200,000.00	100.0000	200,000.00	0.00
100,000.0000	HANESBRANDS INC 6.375% 12/15/2020 DD 11/09/10	100,000.00	108.1250	108,125.00	8,125.00



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100,000.0000	HOLOGIC INC 6.250% 08/01/2020 DD 02/01/13	100,000.00	105.5000	105,500.00	5,500.00
125,000.0000	HUGHES SATELLITE SYSTEMS CORP 7.625% 06/15/2021 DD 12/15/11	127,989.76	114.5000	143,125.00	15,135.24
125,000.0000	HUGHES SATELLITE SYSTEMS CORP 6.500% 06/15/2019 DD 12/15/11	126,466.58	111.5000	139,375.00	12,908.42
135,000.0000	HUNTSMAN INTERNATIONAL LLC 8.625% 03/15/2021 DD 03/15/11	149,464.39	110.5000	149,175.00	289.39-
200,000.0000	INEOS GROUP HOLDINGS SA 144A 5.875% 02/15/2019 DD 02/18/14	204,952.56	102.5000	205,000.00	47.44
100,000.0000	INTELSAT LUXEMBORURG S A 7.750% 06/01/2021 DD 04/05/13	105,127.23	105.8750	105,875.00	747.77
100,000.0000	INTELSAT JACKSON HOLDINGS SA 7.250% 10/15/2020 DD 09/30/10	105,844.14	107.7500	107,750.00	1,905.86
100,000.0000	INTELSAT JACKSON HOLDINGS SA 7.500% 04/01/2021 DD 10/01/11	101,869.08	109.5000	109,500.00	7,630.92
150,000.0000	IRON MOUNTAIN INC 6.000% 08/15/2023 DD 08/13/13	154,533.12	108.1250	162,187.50	7,654.38
125,000.0000	ISLE OF CAPRI CASINOS INC 7.750% 03/15/2019 DD 03/07/11	127,101.60	106.7500	133,437.50	6,335.90
300,000.0000	ISLE OF CAPRI CASINOS INC 8.875% 06/15/2020 DD 08/07/12	319,123.49	107.2500	321,750.00	2,626.51



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135,000.0000	LEAR CORP 8.125% 03/15/2020 DD 03/26/10	136,570.71	107.6250	145,293.75	8,723.04
150,000.0000	LEAR CORP 5.375% 03/15/2024 DD 03/14/14	150,000.00	102.7500	154,125.00	4,125.00
200,000.0000	LEVEL 3 FINANCING INC 8.125% 07/01/2019 DD 01/01/12	214,525.09	109.1250	218,250.00	3,724.91
125,000.0000	LEVEL 3 FINANCING INC 7.000% 06/01/2020 DD 12/01/12	125,000.00	109.2500	136,562.50	11,562.50
100,000.0000	LEVEL 3 FINANCING INC 144A 6.125% 01/15/2021 DD 11/14/13	100,000.00	107.1250	107,125.00	7,125.00
250,000.0000	LEVI STRAUSS & CO 7.625% 05/15/2020 DD 05/06/10	250,000.00	107.6250	269,062.50	19,062.50
175,000.0000	LINN ENERGY LLC / LINN ENERGY 7.750% 02/01/2021 DD 09/13/10	178,973.01	107.8750	188,781.25	9,808.24
300,000.0000	MDC PARTNERS INC 144A 6.750% 04/01/2020 DD 03/20/13	311,939.42	105.5000	316,500.00	4,560.58
75,000.0000	MGM RESORTS INTERNATIONAL 7.750% 03/15/2022 DD 03/22/12	75,000.00	117.2500	87,937.50	12,937.50
125,000.0000	MEDASSETS INC 8.000% 11/15/2018 DD 05/15/11	126,351.72	105.7500	132,187.50	5,835.78
150,000.0000	MEDIACOM BRDBND LLC/CORP 144A 5.500% 04/15/2021 DD 03/17/14	150,000.00	101.2500	151,875.00	1,875.00



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INVESTMENT DETAIL
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<u>SHARES/ PAR VALUE</u>	<u>SECURITY DESCRIPTION</u>	<u>COST</u>	<u>PRICE</u>	<u>MARKET VALUE</u>	<u>UNREALIZED GAIN/LOSS</u>
150,000.0000	MIDCONTINENT COMMUNICATIO 144A 6.250% 08/01/2021 DD 07/30/13	150,000.00	103.5000	155,250.00	5,250.00
200,000.0000	MURRAY ENERGY CORP 144A 9.500% 12/05/2020 DD 05/08/14	222,999.06	111.7500	223,500.00	500.94
125,000.0000	NCR CORP 4.625% 02/15/2021 DD 02/15/13	125,329.86	100.7500	125,937.50	607.64
100,000.0000	NRG ENERGY INC 6.625% 03/15/2023 DD 03/15/13	100,000.00	108.2500	108,250.00	8,250.00
250,000.0000	NRG ENERGY INC 144A 6.250% 05/01/2024 DD 04/21/14	250,000.00	104.5000	261,250.00	11,250.00
125,000.0000	NATIONSTAR MORTGAGE LLC / NATI 6.500% 07/01/2021 DD 02/07/13	121,834.18	100.2500	125,312.50	3,478.32
200,000.0000	NORTH ATLANTIC DRILLING L 144A 6.250% 02/01/2019 DD 01/31/14	200,000.00	98.7500	197,500.00	2,500.00-
150,000.0000	NORTHERN BLIZZARD RESOURC 144A 7.250% 02/01/2022 DD 01/29/14	150,000.00	103.0000	154,500.00	4,500.00
175,000.0000	NUANCE COMMUNICATIONS INC 144A 5.375% 08/15/2020 DD 08/14/12	182,345.12	103.5000	181,125.00	1,220.12-
100,000.0000	OASIS PETROLEUM INC 7.250% 02/01/2019 DD 08/01/11	101,135.36	106.0000	106,000.00	4,864.64
125,000.0000	OMEGA HEALTHCARE INVESTORS INC 6.750% 10/15/2022 DD 04/15/11	129,316.91	108.0700	135,087.50	5,770.59



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<u>SHARES/ PAR VALUE</u>	<u>SECURITY DESCRIPTION</u>	<u>COST</u>	<u>PRICE</u>	<u>MARKET VALUE</u>	<u>UNREALIZED GAIN/LOSS</u>
125,000.0000	PQ CORP 144A 8.750% 05/01/2018 DD 11/08/12	131,613.82	108.6250	135,781.25	4,167.43
150,000.0000	PACIFIC DRILLING SA 144A 5.375% 06/01/2020 DD 06/03/13	150,000.00	98.0000	147,000.00	3,000.00-
100,000.0000	PAR PHARMACEUTICAL COS INC 7.375% 10/15/2020 DD 04/15/13	105,223.90	107.5000	107,500.00	2,276.10
125,000.0000	LIGHTSTREAM RESOURCES LTD 144A 8.625% 02/01/2020 DD 01/30/12	129,351.91	105.0000	131,250.00	1,898.09
200,000.0000	PLY GEM INDUSTRIES INC 144A 6.500% 02/01/2022 DD 01/30/14	201,138.55	96.7500	193,500.00	7,638.55-
100,000.0000	POLYMER GROUP INC 144A 6.875% 06/01/2019 DD 06/11/14	100,497.13	101.6250	101,625.00	1,127.87
150,000.0000	PRECISION DRILLING CORP 6.500% 12/15/2021 DD 12/15/11	153,980.38	108.7500	163,125.00	9,144.62
150,000.0000	PRESTIGE BRANDS INC 8.125% 02/01/2020 DD 08/01/12	164,143.22	111.5000	167,250.00	3,106.78
200,000.0000	QUEBECOR MEDIA INC 5.750% 01/15/2023 DD 12/15/12	200,000.00	102.7500	205,500.00	5,500.00
175,000.0000	RHP HOTEL PROPERTIES LP / RHP 5.000% 04/15/2021 DD 10/15/13	175,000.00	99.7500	174,562.50	437.50-
300,000.0000	REGAL ENTERTAINMENT GRP 5.750% 03/15/2022 DD 03/11/14	303,277.43	103.7500	311,250.00	7,972.57



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<u>SHARES/ PAR VALUE</u>	<u>SECURITY DESCRIPTION</u>	<u>COST</u>	<u>PRICE</u>	<u>MARKET VALUE</u>	<u>UNREALIZED GAIN/LOSS</u>
150,000.0000	RENAISSANCE ACQUISITION C 144A 6.875% 08/15/2021 DD 07/30/13	150,000.00	105.0000	157,500.00	7,500.00
375,000.0000	REYNOLDS GROUP ISSUER INC / RE STEP 05/15/2018 DD 05/15/12	378,694.19	104.6250	392,343.75	13,649.56
100,000.0000	REYNOLDS GROUP ISSUER INC / RE 9.875% 08/15/2019 DD 02/15/12	100,000.00	110.7500	110,750.00	10,750.00
175,000.0000	UNITED RENTALS NORTH AMERICA I 8.250% 02/01/2021 DD 01/19/11	179,794.43	111.2500	194,687.50	14,893.07
150,000.0000	SBA COMMUNICATIONS CORP 5.625% 10/01/2019 DD 04/01/13	154,450.03	105.8750	158,812.50	4,362.47
175,000.0000	SAFWAY GROUP HOLDING LLC 144A 7.000% 05/15/2018 DD 05/14/13	177,460.83	106.0000	185,500.00	8,039.17
150,000.0000	SALLY HOLDINGS LLC / SALLY CAP 5.750% 06/01/2022 DD 05/18/12	150,000.00	106.5000	159,750.00	9,750.00
200,000.0000	SEADRILL LTD 144A VAR RT 09/15/2017 DD 09/14/12	200,000.00	105.2500	210,500.00	10,500.00
100,000.0000	SERVICE CORP INTERNATIONAL/US 7.625% 10/01/2018 DD 10/03/06	101,138.58	117.2500	117,250.00	16,111.42
150,000.0000	SERVICE CORP INTL 144A 5.375% 05/15/2024 DD 05/12/14	150,000.00	102.2500	153,375.00	3,375.00
125,000.0000	SIGNODE INDUSTRIAL GROUP 144A 6.375% 05/01/2022 DD 04/29/14	125,000.00	101.2500	126,562.50	1,562.50



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50,000.0000	SINCLAIR TELEVISION GROUP INC 5.375% 04/01/2021 DD 04/02/13	49,576.61	100.6250	50,312.50	735.89
175,000.0000	SINCLAIR TELEVISION GROUP INC 6.125% 10/01/2022 DD 04/01/13	176,581.67	104.5000	182,875.00	6,293.33
225,000.0000	SIRIUS XM RADIO INC 144A 6.000% 07/15/2024 DD 05/06/14	225,000.00	104.0000	234,000.00	9,000.00
125,000.0000	SONIC AUTOMOTIVE INC 5.000% 05/15/2023 DD 05/09/13	126,243.76	98.2500	122,812.50	3,431.26-
100,000.0000	SPECTRUM BRANDS INC 6.625% 11/15/2022 DD 11/15/13	100,000.00	108.2500	108,250.00	8,250.00
100,000.0000	SPRINT NEXTEL CORP 144A 7.000% 03/01/2020 DD 03/01/12	100,000.00	115.0000	115,000.00	15,000.00
100,000.0000	SPRINT NEXTEL CORP 7.000% 08/15/2020 DD 08/14/12	100,000.00	110.6250	110,625.00	10,625.00
100,000.0000	SPRINT NEXTEL CORP 6.000% 11/15/2022 DD 11/14/12	100,000.00	102.0000	102,000.00	2,000.00
150,000.0000	SPRINT CORP 144A 7.875% 09/15/2023 DD 09/11/13	150,000.00	111.2500	166,875.00	16,875.00
75,000.0000	SPRINT CORP 144A 7.125% 06/15/2024 DD 12/12/13	75,000.00	106.0000	79,500.00	4,500.00
150,000.0000	SUBURBAN PROPANE PARTNRS 5.500% 06/01/2024 DD 05/27/14	151,495.21	101.2500	151,875.00	379.79



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275,000.0000	SUNGARD DATA SYSTEMS INC 7.625% 11/15/2020 DD 11/16/10	281,629.37	109.0000	299,750.00	18,120.63
150,000.0000	TENET HEALTHCARE CORP 6.000% 10/01/2020 DD 09/27/13	150,000.00	108.5000	162,750.00	12,750.00
300,000.0000	T-MOBILE USA INC 6.633% 04/28/2021 DD 07/28/13	300,000.00	108.2500	324,750.00	24,750.00
200,000.0000	TW TELECOM HOLDINGS INC 5.375% 10/01/2022 DD 10/02/12	201,944.41	109.3750	218,750.00	16,805.59
150,000.0000	TW TELECOM HOLDINGS INC 6.375% 09/01/2023 DD 08/26/13	160,284.26	113.7500	170,625.00	10,340.74
150,000.0000	TELESAT CANADA / TELESAT 144A 6.000% 05/15/2017 DD 05/14/12	155,331.81	103.1250	154,687.50	644.31-
240,000.0000	TENET HEALTHCARE CORP 8.000% 08/01/2020 DD 08/17/10	244,646.95	108.3750	260,100.00	15,453.05
125,000.0000	TEREX CORP 6.000% 05/15/2021 DD 11/26/12	125,000.00	107.7500	134,687.50	9,687.50
200,000.0000	TOWNSQUARE RADIO LLC / TO 144A 9.000% 04/01/2019 DD 04/04/12	211,558.33	110.7500	221,500.00	9,941.67
175,000.0000	TRANSDIGM INC 7.500% 07/15/2021 DD 07/01/13	175,000.00	110.7500	193,812.50	18,812.50
150,000.0000	TRANSDIGM INC 144A 6.500% 07/15/2024 DD 06/04/14	150,000.00	104.1250	156,187.50	6,187.50



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<u>SHARES/ PAR VALUE</u>	<u>SECURITY DESCRIPTION</u>	<u>COST</u>	<u>PRICE</u>	<u>MARKET VALUE</u>	<u>UNREALIZED GAIN/LOSS</u>
100,000.0000	TRINIDAD DRILLING LTD 144A 7.875% 01/15/2019 DD 12/16/10	105,644.09	105.7500	105,750.00	105.91
200,000.0000	TRINSEO OP / TRINSEO FIN 8.750% 02/01/2019 DD 02/01/14	209,094.42	107.7500	215,500.00	6,405.58
100,000.0000	TRONOX FINANCE LLC 6.375% 08/15/2020 DD 08/15/13	100,596.87	103.2500	103,250.00	2,653.13
250,000.0000	UPCB FINANCE VI LTD 144A 6.875% 01/15/2022 DD 02/07/12	250,000.00	109.2500	273,125.00	23,125.00
100,000.0000	USG CORP 144A 5.875% 11/01/2021 DD 10/31/13	100,000.00	106.0000	106,000.00	6,000.00
175,000.0000	UNIT CORP 6.625% 05/15/2021 DD 05/18/11	173,188.06	106.7500	186,812.50	13,624.44
125,000.0000	UNITED RENTALS NORTH AMERICA I 7.375% 05/15/2020 DD 11/15/12	127,080.80	110.5000	138,125.00	11,044.20
69,000.0000	UNIVISION COMMUNICATIONS 144A 6.750% 09/15/2022 DD 08/29/12	74,834.97	110.6250	76,331.25	1,496.28
200,000.0000	VALEANT PHARMACEUTICALS I 144A 6.750% 10/01/2017 DD 09/28/10	193,720.59	104.2500	208,500.00	14,779.41
200,000.0000	VIASAT INC 6.875% 06/15/2020 DD 06/15/12	203,018.15	107.7500	215,500.00	12,481.85
101,000.0000	VIRGIN MEDIA FINANCE PLC 8.375% 10/15/2019 DD 11/09/09	100,738.78	105.7500	106,807.50	6,068.72



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175,000.0000	VPII ESCROW CORP 144A 7.500% 07/15/2021 DD 07/12/13	175,000.00	110.7500	193,812.50	18,812.50
200,000.0000	WMG ACQUISITION CORP 144A 5.625% 04/15/2022 DD 04/09/14	200,185.34	100.6250	201,250.00	1,064.66
150,000.0000	WMG ACQUISITION CORP 144A 6.750% 04/15/2022 DD 04/09/14	150,733.58	100.0000	150,000.00	733.58-
175,000.0000	WEST CORP 8.625% 10/01/2018 DD 07/15/11	181,101.03	106.2500	185,937.50	4,836.47
150,000.0000	WEST CORP 5.375% 07/15/2022 DD 07/01/14	150,000.00	99.0000	148,500.00	1,500.00-
300,000.0000	WIDEOPENWEST FINANCE LLC / WID 10.250% 07/15/2019 DD 01/15/13	320,191.71	112.3750	337,125.00	16,933.29
200,000.0000	WIND ACQUISITION FIN SA 144A 4.750% 07/15/2020 DD 07/10/14	200,000.00	100.7500	201,500.00	1,500.00
325,000.0000	WINDSTREAM CORP 7.750% 10/15/2020 DD 10/06/10	336,914.47	108.3750	352,218.75	15,304.28
150,000.0000	MALLINCKRODT 4/14 BRIDGE	150,000.00	100.0000	150,000.00	0.00
300,000.0000	AMERICAN ENERGY BRIDGE LOAN A	300,000.00	100.0000	300,000.00	0.00
TOTAL INVESTMENTS FIXED INCOME SECURITIES		29,301,404.82		30,436,333.80	1,134,928.98
TOTAL INVESTMENT		30,539,323.06		31,674,252.04	1,134,928.98



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<u>INVESTMENTS CASH EQUIVALENTS</u>					
0.0700	FIDELITY INSTL MM PRIME 690	0.07	100.0000	0.07	0.00
TOTAL INVESTMENTS CASH EQUIVALENTS		0.07		0.07	0.00
TOTAL INVESTMENT		0.07		0.07	0.00



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<u>INVESTMENTS CASH EQUIVALENTS</u>					
0.0700	FIDELITY INSTL MM PRIME 690	0.07	100.0000	0.07	0.00
TOTAL INVESTMENTS CASH EQUIVALENTS		0.07		0.07	0.00
TOTAL INVESTMENT		0.07		0.07	0.00



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<u>INVESTMENTS CASH EQUIVALENTS</u>					
0.0700	FIDELITY INSTL MM PRIME 690	0.07	100.0000	0.07	0.00
TOTAL INVESTMENTS CASH EQUIVALENTS		0.07		0.07	0.00
<u>INVESTMENTS EQUITY</u>					
504,439.8600	PARAMETRIC TAX-MANAGED EMERGIN	23,755,815.62	52.4200	26,442,737.46	2,686,921.84
TOTAL INVESTMENTS EQUITY		23,755,815.62		26,442,737.46	2,686,921.84
TOTAL INVESTMENT		23,755,815.69		26,442,737.53	2,686,921.84



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<u>INVESTMENTS CASH EQUIVALENTS</u>					
0.0100	AUD (AUSTRALIAN DOLLARS)	0.01	0.0000	0.01	0.00
30.1600	NZD (NEW ZEALAND DOLLAR)	26.13	0.0000	26.41	0.28 C
226.0200	CHF (SWISS FRANC)	253.71	0.0000	254.87	1.16 C
7,932.7200	GBP (GREAT BRITISH POUNDS)	13,498.32	0.0000	13,563.76	65.44 C
25,175.0100	HKD (HONG KONG DOLLARS)	3,247.82	0.0000	3,248.24	0.42 C
6,623,516.0000	JPY (JAPANESE YEN)	65,163.20	0.0000	65,381.93	218.73 C
5,293.4300	SGD (SINGAPORE DOLLARS)	4,233.39	0.0000	4,246.12	12.73 C
4,147.9200	ILS (ISRAELI SHEKEL)	1,196.33	0.0000	1,209.75	13.42 C
53.6100	DKK (DANISH KRONE)	9.81	0.0000	9.85	0.04 C
6,873.0000	NOK (NORWEGIAN KRONE)	1,122.51	0.0000	1,120.06	2.45-C
4,821.3200	SEK (SWEDISH KRONA)	722.14	0.0000	721.18	0.96-C
20,287.8900	EUR (EURO)	27,625.92	0.0000	27,777.16	151.24 C
22,020.4700	FIDELITY INSTL MM PRIME 690	22,020.47	100.0000	22,020.47	0.00
TOTAL INVESTMENTS CASH EQUIVALENTS		139,119.76		139,579.81	460.05 460.05 C 0.00 I



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<u>INVESTMENTS PREFERRED SECURITIES</u>					
713.0000	HENKEL AG & CO KGAA PFD	39,255.97	115.5973	82,420.90	43,164.93
					927.04 C 42,237.89 I
667.0000	VOLKSWAGEN AG PFD	82,601.18	262.6029	175,156.18	92,555.00
					428.42- C 92,983.42 I
438.0000	BAYERISCHE MOTOREN WERKE-PRF PFD	15,786.09	95.8541	41,984.14	26,198.05
					472.24 C 25,725.81 I
660.0000	PORSCHE AUTOMOBIL HOLDING SE PFD	37,079.71	104.1786	68,757.89	31,678.18
					872.04- C 32,550.22 I
993,342.0000	ROLLS-ROYCE HOLDINGS C SHS ENTITLEMENT (JULY 2014)	1,666.63	0.0017	1,698.46	31.83 C
TOTAL INVESTMENTS PREFERRED SECURITIES		176,389.58		370,017.57	193,627.99 130.65 C 193,497.34 I

INVESTMENTS EQUITY



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1,129.0000	RECALL HOLDINGS LTD	4,283.11	4.5116	5,093.60	810.49 160.28 C 650.21 I
6,034.0000	ORORA LTD	6,217.95	1.3449	8,115.65	1,897.70 477.22 C 1,420.48 I
27,735.0000	SCENTRE GROUP	83,606.63	3.0203	83,768.58	161.95 426.01 C 264.06- I
9,725.0000	WESTFIELD CORP NPV STAPLED UNITS	105,248.07	6.7485	65,629.43	39,618.64- 994.45 C 40,613.09- I
6,637.0000	TATTS GROUP LTD	14,981.11	3.0863	20,484.37	5,503.26 499.17 C 5,004.09 I
739.0000	SIMS METAL MANAGEMENT LTD	15,073.98	9.1364	6,751.85	8,322.13- 164.53 C 8,486.66- I
1,794.0000	AGL ENERGY NPV	24,908.16	14.6107	26,211.77	1,303.61 638.74 C 664.87 I
5,024.0000	GOODMAN LTD (STAPLED UNITS)	15,159.49	4.7664	23,946.61	8,787.12 583.53 C 8,203.59 I



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20,283.0000	DEXUS PROPERTY GROUP NPV (STAPLED)	15,136.42	1.0476	21,249.96	6,113.54
					517.82 C 5,595.72 I
3,887.0000	METCASH LIMITED NPV	15,004.95	2.4917	9,685.49	5,319.46- 236.02 C 5,555.48- I
2,405.0000	SEEK LIMITED NPV	29,332.26	14.9600	35,978.85	6,646.59 495.56- C 7,142.15 I
5,645.0000	BRAMBLES LTD NPV	38,225.87	8.6739	48,964.63	10,738.76 1,193.18 C 9,545.58 I
3,704.0000	ASCIANO LTD	19,041.93	5.3138	19,682.59	640.66 479.63 C 161.03 I
1,944.0000	MACQUARIE GROUP LIMITED NPV	77,372.75	56.2817	109,411.77	32,039.02 76.86- C 32,115.88 I
1,986.0000	CROWN RESORTS LTD	14,820.75	14.2710	28,342.23	13,521.48 690.65 C 12,830.83 I
2,429.0000	ECHO ENTERTAINMENT GROUP LTD	11,331.14	2.9636	7,198.80	4,132.34- 980.46- C 3,151.88- I



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1,439.0000	DULUXGROUP LTD	3,144.39	5.3421	7,687.41	4,543.02 568.51 C 3,974.51 I
179.0000	DART ENERGY LTD	15.09	0.1698	30.41	15.32 0.23 C 15.09 I
2,284.0000	JAMES HARDIE INDUSTRIES PLC	15,066.60	13.0628	29,835.63	14,769.03 727.04 C 14,041.99 I
2,571.0000	TREASURY WINE ESTATES LTD	8,929.90	4.7286	12,157.46	3,227.56 1,776.25- C 5,003.81 I
5,311.0000	ARRIUM LTD	19,376.60	0.7503	3,985.17	15,391.43- 97.11 C 15,488.54- I
5,234.0000	SYDNEY AIRPORT	10,743.15	3.9830	20,847.27	10,104.12 1,063.20 C 9,040.92 I
932.0000	SHOPPING CENTRES AUSTRALASIA	1,369.30	1.6234	1,513.03	143.73 162.55- C 306.28 I
2,945.0000	ALS LTD	29,737.13	8.3625	24,627.59	5,109.54- 790.62- C 4,318.92- I
7,147.0000	AURIZON HOLDINGS LTD	20,354.90	4.7003	33,593.57	13,238.67 1,708.42- C 14,947.09 I



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8,411.0000	FEDERATION CENTRES	19,557.65	2.3501	19,767.42	209.77 429.34- C 639.11 I
806.0000	RAMSAY HEALTH CARE LTD AUD0.10	30,447.59	42.9451	34,613.81	4,166.22 476.74- C 4,642.96 I
12,295.0000	AUSTRALIA & NEW ZEALAND BANK GROUP NPV	294,303.86	31.4679	386,898.56	92,594.70 4,044.94 C 88,549.76 I
6,034.0000	AMCOR LIMITED NPV	50,343.80	9.8443	59,400.84	9,057.04 1,692.58- C 10,749.62 I
13,807.0000	WESTPAC BANKING CORP NPV	370,349.34	31.9776	441,515.25	71,165.91 5,005.50 C 66,160.41 I
4,948.0000	FORTESCUE METALS G NPV	22,656.47	4.1057	20,315.24	2,341.23- 495.04 C 2,836.27- I
21,625.0000	TELSTRA CORP NPV	68,399.18	4.9174	106,340.04	37,940.86 894.14- C 38,835.00 I
1,652.0000	BENDIGO & ADELAIDE BK LTD NPV	15,296.14	11.5149	19,022.73	3,726.59 463.56 C 3,263.03 I



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2,244.0000	COCA-COLA AMATIL NPV	23,051.74	8.9288	20,036.27	3,015.47- 488.24 C 3,503.71- I
689.0000	ASX LTD NPV	21,512.80	33.6388	23,177.14	1,664.34 564.78 C 1,099.56 I
14,923.0000	BHP BILLITON LIMITED	595,982.51	33.8842	505,654.14	90,328.37- 7,815.44 C 98,143.81- I
10,886.0000	MIRVAC GROUP STAPLED SHS	14,642.90	1.6847	18,340.43	3,697.53 446.93 C 3,250.60 I
4,462.0000	HARVEY NORMAN HLDGS NPV (POST SPLIT)	15,004.74	2.9259	13,055.52	1,949.22- 318.13 C 2,267.35- I
1,778.0000	COMPUTERSHARE NPV (DFD 1 POST REC)	20,689.08	11.7792	20,943.50	254.42 510.35 C 255.93- I
2,252.0000	CSL ORD NPV	75,107.43	62.8132	141,455.37	66,347.94 3,447.04 C 62,900.90 I
818.0000	REA GROUP LTD	29,597.06	40.3118	32,975.08	3,378.02 1,037.62 C 2,340.40 I



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7,429.0000	TRANSURBAN GROUP NPV	41,545.32	6.9750	51,817.66	10,272.34 814.65 C 9,457.69 I
226.0000	COCHLEAR LTD COM	15,087.34	58.2355	13,161.23	1,926.11- 320.72 C 2,246.83- I
3,511.0000	ORIGIN ENERGY LTD NPV (POST RECONSTRUCTION)	53,825.76	13.7990	48,448.59	5,377.17- 1,180.60 C 6,557.77- I
7,621.0000	COMMONWEALTH BANK OF AUSTRALIA ORD NPV	416,237.31	76.3385	581,776.38	165,539.07 6,066.18 C 159,472.89 I
3,444.0000	BORAL LIMITED NEW NPV	14,861.09	4.9552	17,065.75	2,204.66 415.87 C 1,788.79 I
1,743.0000	RIO TINTO LIMITED NPV	127,825.19	55.9797	97,572.69	30,252.50- 2,377.67 C 32,630.17- I
3,259.0000	CSR ORD NPV	11,499.51	3.2940	10,735.26	764.25- 602.99 C 1,367.24- I
5,231.0000	APA GROUP NPV	30,146.87	6.5031	34,017.85	3,870.98 468.55- C 4,339.53 I



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8,312.0000	INSURANCE AUSTRALIA GROUP PLC	30,019.09	5.5120	45,816.44	15,797.35 1,116.47 C 14,680.88 I
8,617.0000	CFS RETAIL PROPERTY TRUST GROUP	14,845.80	1.9254	16,591.64	1,745.84 404.32 C 1,341.52 I
7,418.0000	GPT GROUP	19,990.81	3.6243	26,885.68	6,894.87 655.16 C 6,239.71 I
1,389.0000	OZ MINERALS LTD AUD0.4	13,468.91	3.8603	5,362.02	8,106.89- 216.20 C 8,323.09- I
1,439.0000	ORICA LIMITED	35,663.09	18.3861	26,457.74	9,205.35- 644.73 C 9,850.08- I
374.0000	LEIGHTON HOLDINGS LTD ORD A\$0.50	13,483.03	18.6221	6,964.69	6,518.34- 169.72 C 6,688.06- I
2,148.0000	LEND LEASE GROUP NPV	17,177.50	12.3738	26,579.08	9,401.58 647.68 C 8,753.90 I
662.0000	WORLEYPARSONS LTD NPV	15,607.53	16.4324	10,878.27	4,729.26- 265.09 C 4,994.35- I



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5,081.0000	SUNCORP GROUP LIMITED	40,539.00	12.7797	64,933.80	24,394.80 1,582.33 C 22,812.47 I
10,554.0000	NATL AUSTRALIA BK NPV	278,863.40	30.9394	326,534.46	47,671.06 2,137.34 C 45,533.72 I
1,602.0000	NEWCREST MINING LTD ORD NPV	49,857.23	9.9293	15,906.74	33,950.49- 387.62 C 34,338.11- I
6,446.0000	INCITEC PIVOT NPV	20,666.91	2.7371	17,643.77	3,023.14- 429.95 C 3,453.09- I
2,656.0000	TOLL HLDGS LIMITED NPV	18,181.22	4.8136	12,785.01	5,396.21- 311.54 C 5,707.75- I
11,205.0000	AMP LIMITED AUS0.40	61,134.02	5.0024	56,051.95	5,082.07- 2,327.61 C 7,409.68- I
5,689.0000	QANTAS AIRWAYS NPV	14,885.39	1.1892	6,765.65	8,119.74- 164.87 C 8,284.61- I
5,219.0000	QBE INS GROUP A\$1	101,721.96	10.2596	53,545.11	48,176.85- 332.52- C 47,844.33- I
3,640.0000	SANTOS LIMITED NPV	49,465.16	13.4593	48,991.86	473.30- 1,193.85 C 1,667.15- I



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1,475.0000	SONIC HEALTHCARE LTD ORD A\$0.20	19,568.63	16.3569	24,126.46	4,557.83
					587.93 C 3,969.90 I
9,526.0000	STOCKLAND TRUST GROUP NPV (STAPLED)	34,579.03	3.6621	34,885.53	306.50
					850.11 C 543.61- I
5,304.0000	WESFARMERS ORD NPV	162,698.54	39.4906	209,458.59	46,760.05
					3,636.87 C 43,123.18 I
9,755.0000	ALUMINA LTD NPV	15,862.74	1.2741	12,429.80	3,432.94-
					302.89 C 3,735.83- I
1,918.0000	ILUKA RESOURCES LIMITED	34,964.36	7.6735	14,717.77	20,246.59-
					1,946.05- C 18,300.54- I
2,992.0000	WOODSIDE PETROLEUM NPV	124,361.50	38.7639	115,981.65	8,379.85-
					1,776.48 C 10,156.33- I
5,565.0000	WOOLWORTHS LIMITED ORD A\$0.25	148,561.72	33.2423	184,993.94	36,432.22
					2,468.25 C 33,963.97 I
8,141.0000	AUCKLAND INTERNATIONAL AIRPORT LTD	29,464.50	3.4146	27,798.62	1,665.88-
					633.41 C 2,299.29- I



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1,956.0000	CHORUS LTD	3,489.14	1.5190	2,971.32	517.82- 572.35 C 1,090.17- I
3,618.0000	FLETCHER BUILDING NPV	21,340.76	7.7135	27,907.79	6,567.03 5,375.64 C 1,191.39 I
9,783.0000	TELECOM CORP OF NEW ZEALAND NPV	11,456.03	2.3464	22,955.56	11,499.53 4,421.74 C 7,077.79 I
209.0000	BUWOG AG	3,827.64	19.3187	4,037.61	209.97 45.11- C 255.08 I
316.0000	RAIFFEISEN BANK INTERNATIONAL HOLDING AG	15,168.28	31.9217	10,087.27	5,081.01- 113.46 C 5,194.47- I
503.0000	ANDRITZ AG NPV (POST SPLIT)	30,018.88	57.7849	29,065.85	953.03- 199.56- C 753.47- I
2,793.0000	IMMOEAST AG NPV(EXCHANGE RATE SH0	0.00	0.0000	0.00	0.00
1,477.0000	TELEKOM AUSTRIA (TA) NPV	20,785.07	9.7757	14,438.75	6,346.32- 162.40 C 6,508.72- I



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1,062.0000	OMV AG NPV	43,564.92	45.1819	47,983.23	4,418.31 432.26- C 4,850.57 I
385.0000	VERBUND AG	15,408.98	19.3666	7,456.16	7,952.82- 83.87 C 8,036.69- I
470.0000	VOESTALPINE AG	19,097.42	47.5848	22,364.86	3,267.44 251.56 C 3,015.88 I
756.0000	ERSTE GROUP BANK AG	32,059.78	32.3393	24,448.53	7,611.25- 274.99 C 7,886.24- I
4,189.0000	IMMOFINANZ AG NPV	13,623.91	3.5324	14,797.25	1,173.34 121.36 C 1,051.98 I
910.0000	BELGACOM NPV	35,767.97	33.1813	30,195.03	5,572.94- 339.63 C 5,912.57- I
893.0000	AGEAS NV	30,644.28	39.8901	35,621.94	4,977.66 420.47 C 4,557.19 I
422.0000	UMICORE NPV	15,349.46	46.4552	19,604.12	4,254.66 220.51 C 4,034.15 I
367.0000	DELHAIZE GROUP	30,182.38	67.6497	24,827.44	5,354.94- 279.25 C 5,634.19- I



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1,206.0000	KBC GROUPE NPV	61,950.22	54.4237	65,635.00	3,684.78 174.94 C 3,509.84 I
3,520.0000	ANHEUSER-BUSCH INBEV NV	196,599.62	114.8716	404,348.33	207,748.71 1,244.04 C 206,504.67 I
290.0000	SOLVAY NPV	30,279.70	172.1021	49,909.62	19,629.92 561.38 C 19,068.54 I
404.0000	UCB S A NPV	17,542.86	84.6545	34,200.44	16,657.58 384.70 C 16,272.88 I
310.0000	COLRUYT SA NPV	15,274.96	50.7954	15,746.59	471.63 177.11 C 294.52 I
322.0000	GROUPE BRUXELLES L NPV	28,705.78	103.9047	33,457.34	4,751.56 376.32 C 4,375.24 I
621.0000	PROSIEBENSAT1 MEDI	29,592.34	44.5452	27,662.64	1,929.70- 189.91- C 1,739.79- I
1,907.0000	DEUTSCHE WOHNEN AG NPV (BR)	37,687.83	21.5641	41,122.76	3,434.93 240.28- C 3,675.21 I
323.0000	LANXESS AG NPV	23,966.27	67.4922	21,800.00	2,166.27- 941.01 C 3,107.28- I



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2,607.0000	SKY DEUTSCHLAND AG	23,778.11	9.2116	24,014.75	236.64 166.63 C 70.01 I
102.0000	WACKER CHEMIE AG NPV (BR)	15,472.97	115.4604	11,776.96	3,696.01- 132.46 C 3,828.47- I
229.0000	KABEL DEUTSCHLAND HOLDING AG	30,015.85	146.4305	33,532.61	3,516.76 443.30 C 3,073.46 I
169.0000	BRENNTAG AG	19,442.18	178.6740	30,195.92	10,753.74 1,355.24- C 12,108.98 I
689.0000	K + S AG SHS	41,364.10	32.8801	22,654.42	18,709.68- 254.81 C 18,964.49- I
231.0000	HUGO BOSS AG	29,901.01	149.4427	34,521.27	4,620.26 237.01- C 4,857.27 I
4,547.0000	COMMERZBANK AG	89,516.56	15.7178	71,469.03	18,047.53- 1,394.64- C 16,652.89- I
354.0000	OSRAM LICHT AG	10,258.82	50.4326	17,853.15	7,594.33 295.21 C 7,299.12 I
1,036.0000	ADIDAS AG	65,806.43	101.2760	104,921.96	39,115.53 2,172.66 C 36,942.87 I



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666.0000	FRESENIUS SE & CO KGAA	57,849.16	149.1004	99,300.89	41,451.73 2,791.08 C 38,660.65 I
980.0000	UNITED INTERNET AG NPV REGD	15,204.65	44.0524	43,171.35	27,966.70 485.60 C 27,481.10 I
302.0000	HANNOVER RUECKVERSICHERUNG SE	15,281.62	90.1037	27,211.34	11,929.72 306.07 C 11,623.65 I
656.0000	GEA GROUP AG NPV	15,646.56	47.3452	31,058.46	15,411.90 349.35 C 15,062.55 I
464.0000	CONTINENTAL AG NPV	46,835.25	231.5917	107,458.56	60,623.31 5,238.16 C 55,385.15 I
4,467.0000	DEUTSCHE POST AG NPV (REGD)	99,304.66	36.1592	161,523.38	62,218.72 966.94 C 61,251.78 I
526.0000	MERCK KGAA NPV	31,325.87	86.7904	45,651.76	14,325.89 1,517.02 C 12,808.87 I
2,491.0000	RWE AG (NEU) NPV 'A'	180,989.33	42.9433	106,971.99	74,017.34- 879.34 C 74,896.68- I
4,177.0000	SAP SE ORD NPV	227,278.29	77.2200	322,548.19	95,269.90 3,883.53 C 91,386.37 I



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7,600.0000	E.ON SE NPV	284,104.58	20.6467	156,915.54	127,189.04- 1,764.96 C 128,954.00- I
520.0000	HENKEL AG & CO KGAA NPV(BR)	24,485.06	100.6325	52,328.91	27,843.85 588.58 C 27,255.27 I
454.0000	METRO AG ORD NPV	27,492.62	43.5800	19,785.34	7,707.28- 222.54 C 7,929.82- I
3,679.0000	BAYER AG ORD NPV	273,768.66	141.2278	519,577.16	245,808.50 4,252.03 C 241,556.47 I
4,086.0000	BASF SE	276,971.78	116.4188	475,687.32	198,715.54 4,026.42 C 194,689.12 I
476.0000	CELESIO AG	15,408.50	35.5979	16,944.60	1,536.10 190.59 C 1,345.51 I
572.0000	BEIERSDORF AG NPV	41,164.75	96.7578	55,345.48	14,180.73 1,505.56 C 12,675.17 I
180.0000	HOCHTIEF AG NPV	15,546.92	86.5439	15,577.91	30.99 175.22 C 144.23- I
563.0000	HEIDELBERGCEMENT AG	32,103.03	85.3391	48,045.92	15,942.89 540.41 C 15,402.48 I



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971.0000	FRESENIUS MEDICAL CARE AG & CO KGAA	54,716.77	67.2115	65,262.44	10,545.67
					734.05 C 9,811.62 I
2,029.0000	ALLIANZ SE (SOCIETAS EUROPEAE)	267,442.15	166.6255	338,083.25	70,641.10
					2,983.03 C 67,658.07 I
1,251.0000	DEUTSCHE LUFTHANSA AG ORD NPV REGD VINK	21,434.01	21.4682	26,856.81	5,422.80
					302.08 C 5,120.72 I
790.0000	MUENCHENER RUECKVERSICHERUNGS G NPV REGD	130,218.66	221.6653	175,115.65	44,896.99
					1,969.67 C 42,927.32 I
260.0000	SALZGITTER AG ORD NPV	24,326.59	42.0876	10,942.79	13,383.80-
					123.08 C 13,506.88- I
159.0000	VOLKSWAGEN AG ORD NPV	15,419.33	258.4955	41,100.79	25,681.46
					462.31 C 25,219.15 I
4,280.0000	DAIMLER AG ORD NPV (REGD)	221,763.79	93.6498	400,821.40	179,057.61
					4,750.01 C 174,307.60 I
423.0000	MAN SE ORD NPV	35,721.73	123.5657	52,268.33	16,546.60
					587.90 C 15,958.70 I



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2,414.0000	THYSSENKRUPP AG NPV	73,595.47	29.1492	70,366.18	3,229.29- 305.79 C 3,535.08- I
3,543.0000	SIEMENS AG NPV REGD	352,463.61	132.0545	467,869.16	115,405.55 7,704.03 C 107,701.52 I
924.0000	QIAGEN NV	21,531.89	24.2339	22,392.17	860.28 251.86 C 608.42 I
852.0000	LINDE AG NPV	115,670.99	212.6289	181,159.90	65,488.91 4,745.81 C 60,743.10 I
5,379.0000	DEUTSCHE BANK AG ORD NPV REGD	317,776.92	35.1803	189,234.89	128,542.03- 1,694.67 C 130,236.70- I
1,324.0000	BAYERISCHE MOTOREN WERKE (BMW) AG EUR1	63,042.09	126.8106	167,897.33	104,855.24 1,888.49 C 102,966.75 I
13,001.0000	DEUTSCHE TELEKOM AG NPV (REGD)	182,435.11	17.5251	227,844.09	45,408.98 2,092.76 C 43,316.22 I
6,285.0000	INFINEON TECHNOLOGIES ORD NPV	54,946.54	12.4989	78,556.04	23,609.50 732.51 C 22,876.99 I



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779.0000	DEUTSCHE BOERSE AG NPV	58,705.68	77.6034	60,453.07	1,747.39 679.97 C 1,067.42 I
9,178.0000	BANCO POPULAR ESPANOL SA	65,411.76	6.6814	61,322.37	4,089.39- 693.79 C 4,783.18- I
1,120.0000	GAMESA CORP TECNO EUR0.17	15,296.59	12.4852	13,983.51	1,313.08- 157.28 C 1,470.36- I
566.0000	ACS ACTIVIDADES CO EUR0.5	26,907.85	45.7296	25,882.96	1,024.89- 291.13 C 1,316.02- I
996.0000	GRIFOLS SA EUR0.5	13,351.17	54.6496	54,431.02	41,079.85 612.23 C 40,467.62 I
1,759.0000	FERROVIAL SA EUR0.2	17,472.80	22.2692	39,171.57	21,698.77 440.59 C 21,258.18 I
4,114.0000	MAPFRE SA EUR0.10	15,367.88	3.9855	16,396.74	1,028.86 184.43 C 844.43 I
13,445.0000	BANCO DE SABADELL SA NEW EUR0.125 (POST SPLIT 20)	39,086.39	3.4119	45,873.29	6,786.90 1,149.63 C 5,637.27 I



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8,579.0000	CAIXABANK	48,825.57	6.1707	52,938.94	4,113.37 131.88- C 4,245.25 I
20,609.0000	IBERDROLA SA EUR0.75 (POST SUBDIVISION)	161,864.29	7.6439	157,534.47	4,329.82- 1,617.86 C 5,947.68- I
1,158.0000	AMADEUS IT HLD SA-A SHS0.0100	23,116.04	41.2387	47,754.53	24,638.49 2,061.35 C 22,577.14 I
6,260.0000	INTERNATIONAL CONSOLIDATED AIRLINES GROUP SA	23,183.77	6.3405	39,691.74	16,507.97 2,374.28- C 18,882.25 I
2,074.0000	DISTRIBUIDORA INTERNACIONAL DE ALIMENTACION SA	10,199.43	9.2061	19,093.59	8,894.16 1,077.29- C 9,971.45 I
17,273.0000	BANKIA SA	30,002.65	1.9387	33,487.45	3,484.80 442.69 C 3,042.11 I
1,182.0000	ABERTISINFRAESTRUCTURAS SA EUR3	18,623.59	23.0085	27,196.12	8,572.53 355.92 C 8,216.61 I
1,786.0000	BANKINTER S A EUR0.3 REGD	9,732.00	7.8246	13,974.90	4,242.90 157.19 C 4,085.71 I



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25,479.0000	BANCO BILBAO VIZCAYA ARGENTARIA SA EUR0.49	290,929.54	12.7454	324,740.49	33,810.95 7,198.60 C 26,612.35 I
133.0000	ACCIONA SA EUR1.00	15,088.42	89.4328	11,894.57	3,193.85- 133.79 C 3,327.64- I
2,176.0000	GAS NAT SDG SA EUR1	46,666.85	31.5794	68,716.87	22,050.02 23.66- C 22,073.68 I
4,138.0000	REPSOL SA	99,934.59	26.3698	109,118.35	9,183.76 694.55 C 8,489.21 I
50,749.0000	BANCO SANTANDER SA	578,737.03	10.4466	530,155.24	48,581.79- 9,213.51 C 57,795.30- I
919.0000	RED ELECTRICA CORPORATION SA EUR2	43,780.36	91.4592	84,051.02	40,270.66 2,105.49 C 38,165.17 I
18,268.0000	TELEFONICA SA EUR1	423,040.95	17.1417	313,145.64	109,895.31- 2,277.27 C 112,172.58- I
1,116.0000	INDUSTRIA DE DISENO TEXTIL SA EUR0.15	79,551.23	153.8924	171,743.99	92,192.76 1,105.56- C 93,298.32 I



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715.0000	ENAGAS SA EUR1.50	16,051.50	32.1750	23,005.14	6,953.64 258.75 C 6,694.89 I
671.0000	PEUGEOT SA WTS EXP 29-APR-2017	2,088.90	2.1920	1,470.84	618.06- 16.55 C 634.61- I
5,965.0000	GDF SUEZ EUR1	214,324.45	27.5267	164,197.13	50,127.32- 2,363.05 C 52,490.37- I
808.0000	ALSTOM EUR7 (POST CONSOLIDATION	51,227.78	36.4536	29,454.52	21,773.26- 331.30 C 22,104.56- I
430.0000	EUTELSAT COMMUNICATIONS PROMESSES EUR1	15,258.90	34.7421	14,939.14	319.76- 168.17 C 487.93- I
946.0000	EDF EUR0.5	52,270.14	31.4904	29,789.97	22,480.17- 335.08 C 22,815.25- I
185.0000	ARKEMA EUR10	20,006.99	97.3191	18,004.05	2,002.94- 1,203.86- C 799.08- I
2,331.0000	SES SA FIDUCIARY DR EACH REP 1 'A' SHS	63,828.60	37.9254	88,404.24	24,575.64 1,665.48 C 22,910.16 I



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252.0000	IMERYS EUR2	15,816.57	84.2574	21,232.89	5,416.32 238.82 C 5,177.50 I
371.0000	GEMALTO EUR 1	23,187.80	103.8911	38,543.60	15,355.80 3,455.60 C 11,900.20 I
1,183.0000	SAFRAN SA EUR0.20	49,962.11	65.4659	77,446.18	27,484.07 61.24 C 27,422.83 I
3,487.0000	NATIXIS EUR1.6 (POST SUBDU)	17,730.49	6.4103	22,352.92	4,622.43 227.75 C 4,394.68 I
662.0000	SCOR SE EUR7.876972 (POST CONSOLIDATION)	16,982.19	34.3930	22,768.20	5,786.01 256.09 C 5,529.92 I
1,174.0000	REXEL PROMESSES EUR5	28,928.53	23.3850	27,454.09	1,474.44- 188.49- C 1,285.95- I
2,223.0000	VINCI EUR2.50 (POST SUBDIVISIO	136,076.21	74.7555	166,181.68	30,105.47 1,220.00 C 28,885.47 I
1,529.0000	AIR LIQUIDE(L') EUR5.5 (POST-SUBDIVISION)	152,104.90	134.9981	206,412.23	54,307.33 1,588.19 C 52,719.14 I



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2,595.0000	DANONE EUR0.25 (POST SUBDIVISION)	165,807.94	74.2626	192,711.70	26,903.76
					1,535.55 C 25,368.21 I
1,130.0000	LEGRAND SA EUR4	52,463.74	61.1804	69,133.93	16,670.19
					99.09- C 16,769.28 I
295.0000	EIFFAGE EUR4(POST SUBDIVISION)	15,626.63	67.9851	20,055.62	4,428.99
					225.58 C 4,203.41 I
9,185.0000	TOTAL SA EUR2.5 POST SUBDIVISION	537,536.73	72.2637	663,742.42	126,205.69
					6,093.83 C 120,111.86 I
187.0000	ADP PROMESSES EUR3	15,622.18	131.7396	24,635.31	9,013.13
					277.10 C 8,736.03 I
456.0000	VALLOUREC (USIN A TUB DE LOR EUR2 (POST SUBDIVISION)	47,602.96	44.7780	20,418.79	27,184.17-
					229.66 C 27,413.83- I
1,628.0000	BUREAU VERITAS EUR0.12	29,434.12	27.7526	45,181.35	15,747.23
					1,019.68 C 14,727.55 I
1,905.0000	GET SA EUR0.40 (POST CONSOLIDATION)	19,712.61	13.5230	25,761.50	6,048.89
					289.75 C 5,759.14 I



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1,077.0000	SUEZ ENVIRONNEMENT CO EUR4	25,002.43	19.1407	20,614.55	4,387.88- 231.86 C 4,619.74- I
586.0000	EDENRED	11,708.47	30.3198	17,767.42	6,058.95 199.86 C 5,859.09 I
896.0000	BOUYGUES EUR1	45,751.45	41.6084	37,281.19	8,470.26- 419.34 C 8,889.60- I
2,420.0000	AIRBUS GROUP	77,719.69	67.0062	162,155.01	84,435.32 5,460.43 C 78,974.89 I
1,579.0000	VEOLIA ENVIRONMENT EUR5.0	55,540.48	19.0517	30,082.68	25,457.80- 338.37 C 25,796.17- I
957.0000	L'OREAL EUR0.2	102,359.86	172.3075	164,898.30	62,538.44 1,854.74 C 60,683.70 I
255.0000	CHRISTIAN DIOR EUR2	28,352.15	198.9374	50,729.06	22,376.91 570.60 C 21,806.31 I
1,239.0000	LVMH MOET HENNESSY EUR0.30	168,126.07	192.7763	238,849.86	70,723.79 1,798.16 C 68,925.63 I
377.0000	THALES EUR3	15,183.26	60.4822	22,801.80	7,618.54 256.49 C 7,362.05 I



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809.0000	CAP GEMINI EUR8	40,722.86	71.3327	57,708.17	16,985.31 649.09 C 16,336.22 I
221.0000	CASINO GUICH-PERR EUR1.53	18,968.44	132.5747	29,299.03	10,330.59 329.54 C 10,001.05 I
872.0000	CIE GENERALE DE GEOPHYSIQUE VERITAS	26,331.74	14.1570	12,344.91	13,986.83- 138.85 C 14,125.68- I
837.0000	PUBLICIS GROUPE SA EUR.4	50,899.30	84.8051	70,981.91	20,082.61 35.44 C 20,047.17 I
725.0000	LAFARGE SA EUR4.00	52,053.68	86.8041	62,932.98	10,879.30 707.86 C 10,171.44 I
724.0000	LAGARDERE S.C.A. EUR6.1(REG)	30,418.37	32.5652	23,577.23	6,841.14- 265.19 C 7,106.33- I
136.0000	ICADE NPV (POST MERGER)	14,999.58	107.2044	14,579.80	419.78- 163.98 C 583.76- I
857.0000	MICHELIN CIE GLE DES ETABL ORD EUR2 REGD	73,026.75	119.4720	102,387.53	29,360.78 412.40 C 28,948.38 I



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1,044.0000	PERNOD-RICARD EUR1.55	99,027.58	120.0744	125,357.73	26,330.15 720.29 C 25,609.86 I
968.0000	RENAULT REGIE NATIONALE DES USINES EUR3.81	59,265.85	90.4049	87,512.02	28,246.17 240.99 C 28,005.18 I
2,160.0000	SCHNEIDER ELECTRIC SE	132,801.63	94.1290	203,318.78	70,517.15 3,257.85 C 67,259.30 I
5,322.0000	VIVENDI SA EUR5.5	140,700.58	24.4667	130,211.83	10,488.75- 1,464.60 C 11,953.35- I
451.0000	TECHNIP SA EUR	38,165.69	109.3813	49,331.01	11,165.32 554.87 C 10,610.45 I
359.0000	VALEO EUR3	38,162.13	134.2999	48,213.67	10,051.54 281.71- C 10,333.25 I
8,896.0000	ORANGE SA	199,082.07	15.7794	140,374.02	58,708.05- 2,222.81 C 60,930.86- I
43.0000	HERMES INTL FRF10 POST SPLIT	5,911.40	368.9859	15,866.39	9,954.99 178.44 C 9,776.55 I



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247.0000	BIC EUR3.82	31,087.03	136.8054	33,790.95	2,703.92 231.99- C 2,935.91 I
320.0000	DASSAULT SYSTEMES SA EUR1	19,313.04	128.6453	41,166.51	21,853.47 463.05 C 21,390.42 I
304.0000	KERING EUR4.00	41,339.28	219.2693	66,657.89	25,318.61 749.75 C 24,568.86 I
644.0000	CNP ASSURANCES EUR1	15,262.20	20.7563	13,367.07	1,895.13- 150.36 C 2,045.49- I
183.0000	NEOPOST FRF4	14,804.70	74.8925	13,705.33	1,099.37- 154.15 C 1,253.52- I
3,166.0000	CARREFOUR EUR2.5	123,577.37	36.8849	116,777.60	6,799.77- 2,181.48 C 8,981.25- I
301.0000	ATOS EUR1	15,655.00	83.2990	25,073.02	9,418.02 282.03 C 9,135.99 I
5,301.0000	SANOFI	410,351.16	106.2186	563,065.10	152,713.94 7,164.92 C 145,549.02 I
586.0000	ACCOR SAR	21,975.91	52.0140	30,480.21	8,504.30 342.82 C 8,161.48 I



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2,730.0000	STMICROELECTRONICS EUR1.04 (SICOVAM)	27,731.89	8.9706	24,489.93	3,241.96- 275.46 C 3,517.42- I
3,486.0000	SOCIETE GENERALE EUR1.25	180,491.52	52.3768	182,585.64	2,094.12 3,256.84 C 1,162.72- I
16,760.0000	ALCATEL LUCENT EUR2 SER'A'	58,736.87	3.5707	59,845.66	1,108.79 279.24 C 829.55 I
824.0000	SOCIETE TELEVISION FRANCAISE 1	15,691.63	16.3818	13,498.67	2,192.96- 151.83 C 2,344.79- I
376.0000	SODEXO EUR4	22,942.37	107.5467	40,437.57	17,495.20 454.83 C 17,040.37 I
467.0000	UNIBAIL-RODAMCO SE EUR5	85,108.66	290.8759	135,839.05	50,730.39 2,998.18 C 47,732.21 I
7,978.0000	AXA EUR2.29	183,071.35	23.8985	190,662.34	7,590.99 1,596.69 C 5,994.30 I
3,005.0000	PEUGEOT SA EUR1	44,830.88	14.7799	44,413.83	417.05- 105.39 C 522.44- I



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803.0000	ESSILOR INTERNATIONAL EURO.18	51,905.94	106.0406	85,150.66	33,244.72 957.77 C 32,286.95 I
3,709.0000	CREDIT AGRICOLE SA EUR3	66,361.36	14.1022	52,305.23	14,056.13- 588.32 C 14,644.45- I
970.0000	ZODIAC AEROSPACE NPV	19,567.36	33.8453	32,830.03	13,262.67 3,319.82 C 9,942.85 I
5,013.0000	BNP PARIBAS EUR2	386,174.16	67.8345	340,054.54	46,119.62- 2,452.05 C 48,571.67- I
1,537.0000	COMPAGNIE DE SAINT-GOBAIN EUR4	75,213.78	56.4158	86,711.13	11,497.35 975.31 C 10,522.04 I
385.0000	KLEPIERRE EUR1.4	15,234.29	50.9529	19,616.88	4,382.59 220.65 C 4,161.94 I
133.0000	GECINA EUR7.50	15,050.60	145.8144	19,393.33	4,342.73 218.14 C 4,124.59 I
134.0000	FONCIERE DES REGIO EUR2	14,717.28	108.4092	14,526.85	190.43- 163.40 C 353.83- I



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190.0000	ILIAD NPV	34,313.61	302.2398	57,425.57	23,111.96 2,732.55 C 20,379.41 I
5,320.0000	BANK OF CYPRUS PUBLIC CO LTD EUR1	19,470.56	0.2834	1,507.76	17,962.80- 65.08 C 18,027.88- I
1,600.0000	OPAP SA EUR0.3 (CR)	27,150.31	17.7989	28,478.32	1,328.01 576.15- C 1,904.16 I
3,057.0000	CNH INDUSTRIAL NV	36,762.87	10.2686	31,391.19	5,371.68- 755.47 C 6,127.15- I
2,204.0000	BANCO POPOLARE SC	44,882.11	16.4708	36,301.81	8,580.30- 80.76 C 8,661.06- I
11,942.0000	BCA MPS NPV (POST REVERSE SPLIT)	32,034.75	1.9373	23,135.80	8,898.95- 160.53 C 9,059.48- I
1,617.0000	FINMECCANICA SPA EUR 4.40	21,901.09	9.5087	15,375.65	6,525.44- 172.94 C 6,698.38- I
11,260.0000	T. E. R. N. A. ORD EURO.22	52,666.46	5.2739	59,384.85	6,718.39 58.37 C 6,660.02 I



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727.0000	EXOR SPA EUR1	29,454.72	41.0608	29,851.21	396.49 204.94- C 601.43 I
1,306.0000	PRYSMIAN CAB & SYS NPV	20,667.44	22.5909	29,503.81	8,836.37 238.11- C 9,074.48 I
9,767.0000	ENEL GREEN POWER SPA EUR0.20	20,795.30	2.8314	27,654.31	6,859.01 1,025.05 C 5,833.96 I
18,653.0000	UNICREDIT SPA	119,897.03	8.3723	156,169.49	36,272.46 4,561.49 C 31,710.97 I
4,921.0000	ASSICURAZIONI GENERALI EUR1	120,172.37	21.9200	107,868.77	12,303.60- 1,213.30 C 13,516.90- I
2,392.0000	BANCA POPOLARE DI MILANO EUR	5,056.82	0.8967	2,145.13	2,911.69- 24.12 C 2,935.81- I
47,333.0000	INTESA SANPAOLO EUR0.52	158,140.65	3.0888	146,202.29	11,938.36- 636.09 C 12,574.45- I
5,057.0000	INTESA SANPAOLO EUR0.52 NON CNV	15,376.77	2.6588	13,446.00	1,930.77- 151.24 C 2,082.01- I



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1,894.0000	MEDIOBANCA SPA EUR0.5	20,650.54	9.9674	18,878.28	1,772.26- 212.34 C 1,984.60- I
2,049.0000	PIRELLI & C SPA	29,482.88	16.0464	32,879.15	3,396.27 225.73- C 3,622.00 I
1,029.0000	SAIPEM EUR1	41,170.05	26.9722	27,754.45	13,415.60- 312.18 C 13,727.78- I
946.0000	LUXOTTICA GROUP EURO.06	35,144.16	57.8739	54,748.78	19,604.62 1,690.24 C 17,914.38 I
2,940.0000	MEDIASET EUR0.52	25,544.63	4.8741	14,330.07	11,214.56- 161.18 C 11,375.74- I
3,057.0000	FIAT SPA EUR3.58	40,473.23	9.8715	30,177.39	10,295.84- 339.42 C 10,635.26- I
804.0000	BENI STABILI SPA EUR0.1	583.99	0.9173	737.53	153.54 85.41 C 68.13 I
33,067.0000	ENEL EUR1	178,966.60	5.8243	192,594.25	13,627.65 1,590.46 C 12,037.19 I
11,625.0000	ENI EUR	277,522.92	27.3556	318,009.05	40,486.13 2,964.15 C 37,521.98 I



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9,098.0000	SNAM SPA	49,464.21	6.0242	54,808.72	5,344.51 1,051.94- C 6,396.45 I
1,887.0000	TENARIS S AUUSD1	41,838.51	23.5493	44,437.68	2,599.17 499.83 C 2,099.34 I
5,102.0000	UBI BANCA SCPA EUR2.5	48,173.65	8.6530	44,147.75	4,025.90- 427.24- C 3,598.66- I
40,119.0000	TELECOM ITALIA EUR0.00	58,685.30	1.2664	50,809.27	7,876.03- 571.50 C 8,447.53- I
24,089.0000	TELECOM ITALIA DI RISP EUR0.00	27,455.45	0.9878	23,796.11	3,659.34- 267.65 C 3,926.99- I
1,190.0000	ATLANTIA SPA	24,445.58	28.5057	33,921.79	9,476.21 381.56 C 9,094.65 I
647.0000	OCI NV EUR1.00	30,254.23	39.0207	25,246.44	5,007.79- 333.75 C 5,341.54- I
278.0000	ALTICE SA	19,100.05	69.6623	19,366.13	266.08 134.37 C 131.71 I
4,398.0000	AHOLD(KON)NV EUR0.01	63,893.06	18.7710	82,555.06	18,662.00 928.57 C 17,733.43 I



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426.0000	HEINEKEN HOLDING EUR1.6	19,014.57	65.7397	28,005.13	8,990.56 315.00 C 8,675.56 I
616.0000	KONINKLIJKE DSM NV EUR1.5	28,200.25	72.8250	44,860.25	16,660.00 504.58 C 16,155.42 I
3,681.0000	ARCELORMITTAL NPV (POST-REORGANISATION)	110,387.67	14.8278	54,581.48	55,806.19- 642.34 C 56,448.53- I
267.0000	FUGRO NV CVZ EURO0.05 (POST-SUBDIVISION)	18,208.17	57.2510	15,286.03	2,922.14- 171.94 C 3,094.08- I
632.0000	BOSKALIS WESTMINSTER GROEP NV NV CVA EUR0.80(POST SUBDIVIS)	30,386.74	57.3468	36,243.21	5,856.47 248.82- C 6,105.29 I
7,040.0000	UNILEVER NV CVA EUR0.16	224,226.04	43.7511	308,008.37	83,782.33 4,603.75 C 79,178.58 I
754.0000	SBM OFFSHORE NV EUR0.25 (POST SUBDIVISION)	15,451.33	16.1354	12,166.12	3,285.21- 136.84 C 3,422.05- I
1,507.0000	TNT EXPRESS NV	18,910.67	9.0500	13,638.47	5,272.20- 406.42- C 4,865.78- I



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1,380.0000	DELTA LLOYD NV	29,292.56	25.3840	35,029.98	5,737.42 240.50- C 5,977.92 I
576.0000	ZIGGO BV	21,711.27	46.2361	26,632.05	4,920.78 1,339.25 C 3,581.53 I
1,670.0000	ASML HOLDING NV EUR0.09 (POST SPLIT)	73,546.78	93.1158	155,503.54	81,956.76 1,056.84- C 83,013.60 I
2,894.0000	REED ELSEVIER NV EUR0.07	35,469.47	22.9332	66,368.86	30,899.39 746.50 C 30,152.89 I
232.0000	CORIO NV EUR10	15,523.60	51.0692	11,848.08	3,675.52- C 136.62 I 3,812.14- I
407.0000	RANDSTAD HLDGS EUR0.1	19,993.90	54.2046	22,061.29	2,067.39 248.14 C 1,819.25 I
927.0000	AKZO NOBEL NV EUR2	53,926.03	74.9609	69,488.81	15,562.78 781.60 C 14,781.18 I
1,113.0000	WOLTERS KLUWERS COM EUR0.12	24,519.12	29.6010	32,945.94	8,426.82 370.57 C 8,056.25 I



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639.0000	KONINKLIJKE VOPAK NV EUR0.5	33,702.56	48.8786	31,233.46	2,469.10- 2,176.29 C 4,645.39- I
6,247.0000	AEGON NV EUR0.12	43,574.69	8.7269	54,517.33	10,942.64 613.20 C 10,329.44 I
16,287.0000	KONINKLIJKE KPN NV EUR0.04	96,283.37	3.6433	59,338.56	36,944.81- 696.55 C 37,641.36- I
3,888.0000	KONINKLIJKE PHILIPS NV	127,516.47	31.7300	123,366.44	4,150.03- 1,387.61 C 5,537.64- I
17,041.0000	ING GROEP N.V. CVA EUR0.24	184,107.15	14.0474	239,383.09	55,275.94 1,954.75 C 53,321.19 I
979.0000	HEINEKEN NV EUR1.60	50,354.25	71.7845	70,277.06	19,922.81 790.46 C 19,132.35 I
868.0000	GALP ENERGIA SGPS EUR1	15,436.19	18.3192	15,901.09	464.90 178.85 C 286.05 I
1,446.0000	JERONIMO MARTINS EUR1 (POST SUBDIVISION)	14,761.22	16.4503	23,787.19	9,025.97 267.56 C 8,758.41 I



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1,905.0000	EDP RENOVAVEIS SA	15,094.07	7.4454	14,183.56	910.51- 159.53 C 1,070.04- I
3,864.0000	BANCO ESPIRITO SANTO SA EUR(REGD)	10,159.42	0.8242	3,184.82	6,974.60- 35.67 C 7,010.27- I
11,598.0000	EDP ENERGIAS PORTUGAL EUR1(REGD)	43,835.44	5.0165	58,182.13	14,346.69 58.62- C 14,405.31 I
3,419.0000	PORTUGAL TELECOM SGPS SA EUR0.03 REG1	38,333.64	3.6638	12,526.68	25,806.96- 140.90 C 25,947.86- I
2,562.0000	CIE FINANCIERE RICHEMONT SA	126,761.21	104.9278	268,825.10	142,063.89 28,352.86 C 113,711.03 I
267.0000	SWISS PRIME SITE AG	20,353.83	82.8822	22,129.57	1,775.74 1,448.26 C 327.48 I
155.0000	GEBERIT CHF0.10 (REGD) (POST SUBDIVISION)	28,368.29	351.0374	54,410.80	26,042.51 8,318.71 C 17,723.80 I
1,235.0000	GAM HOLDING LTD	15,391.36	19.0572	23,535.75	8,144.39 3,598.32 C 4,546.07 I



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407.0000	ACTELION CHF0.5 (REGD)(POST SUBD)	18,768.28	126.5223	51,494.59	32,726.31
					7,872.86 C 24,853.45 I
194.0000	SCHINDLER HLDG AG PTG CERT CHF0.10 (POST-SUBD)	17,521.30	152.0072	29,489.40	11,968.10
					4,508.55 C 7,459.55 I
133.0000	SCHINDLER-HLDG AG CHF0.1 (REGD) (POST-SUBD)	20,001.51	150.7668	20,051.98	50.47
					190.37 C 139.90- I
359.0000	KUEHNE & NAGEL AG CHF1(REGD) (POST-SUBD)	42,285.38	133.0626	47,769.51	5,484.13
					4,703.25 C 780.88 I
16,215.0000	UBS AG CHF0.1 (POST SUBDIVISION)	284,100.74	18.3468	297,494.42	13,393.68
					39,887.82 C 26,494.14- I
927.0000	LOGITECH INTL SA CHF0.25(REGD) (POST SUBDIVISION)	15,451.08	13.0243	12,073.58	3,377.50-
					1,845.89 C 5,223.39- I
362.0000	ARYZTA AG CHF0.02 (REGD)	15,516.57	94.7225	34,289.58	18,773.01
					5,296.23 C 13,476.78 I



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827.0000	JULIUS BAER GRUPPE AG	30,690.61	41.2268	34,094.63	3,404.02 5,212.64 C 1,808.62- I
1,114.0000	TRANSOCEAN LTD	77,796.05	44.9481	50,072.21	27,723.84- 4,052.89 C 31,776.73- I
2,061.0000	SWISS RE LTD	108,183.17	88.9715	183,370.43	75,187.26 18,592.17 C 56,595.09 I
453.0000	SYNGENTA AG CHF0.1	136,894.06	372.4627	168,725.64	31,831.58 21,006.29 C 10,825.29 I
10.0000	SIKA FINANZ AG CHF0.6 (BR)	18,597.62	4,088.8588	40,888.59	22,290.97 3,930.06 C 18,360.91 I
22.0000	SGS SA CHF1(REGD)	31,118.38	2,396.2562	52,717.64	21,599.26 8,059.86 C 13,539.40 I
198.0000	SULZER AG CHF0.01(REGD)	29,954.32	140.2796	27,775.37	2,178.95- 268.31 C 2,447.26- I
94.0000	SWISSCOM AG CHF1.00	34,677.50	581.3035	54,642.53	19,965.03 8,354.14 C 11,610.89 I
31.0000	GIVAUDAN AG CHF10	27,523.91	1,667.7943	51,701.62	24,177.71 7,904.51 C 16,273.20 I



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699.0000	ZURICH INSURANCE GROUP AG CHF0.1	175,959.96	301.4208	210,693.17	34,733.21
					27,588.09 C 7,145.12 I
10,233.0000	NOVARTIS AG CHF0.50 (REGD)	581,221.48	90.5502	926,601.15	345,379.67
					116,616.21 C 228,763.46 I
9,982.0000	ABB LTD CHF1.03 (REGD)	222,272.33	23.0266	229,851.65	7,579.32
					31,283.98 C 23,704.66- I
3,051.0000	ROCHE HLDG AG GENUSSCHEINE NPV	523,361.30	298.2634	910,001.69	386,640.39
					126,714.82 C 259,925.57 I
491.0000	ADECCO SA CHF1 (REGD)	28,742.22	82.3184	40,418.36	11,676.14
					6,179.45 C 5,496.69 I
980.0000	HOLCIM CHF2 (REGD)	74,647.80	87.9003	86,142.31	11,494.51
					13,170.06 C 1,675.55- I
14,345.0000	NESTLE SA	758,537.12	77.4695	1,111,300.74	352,763.62
					156,425.38 C 196,338.24 I
199.0000	BALOISE HOLDING AG CHF0.1	18,010.91	117.8394	23,450.05	5,439.14
					3,585.22 C 1,853.92 I



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183.0000	SONOVA HLDG CHF0.05	22,911.58	152.5710	27,920.50	5,008.92 4,268.69 C 740.23 I
84.0000	STRAUMANN HOLDING AG	22,182.36	231.6193	19,456.02	2,726.34- 116.67 C 2,843.01- I
6,664.0000	CREDIT SUISSE GROUP AG CHF0.04 REGD	299,632.87	28.5972	190,571.76	109,061.11- 24,662.25 C 133,723.36- I
123.0000	SWATCH GROUP CHF2.25 (BR)	39,733.29	603.8565	74,274.36	34,541.07 11,355.60 C 23,185.47 I
261.0000	SWATCH GROUP CHF0.45 (REGD)	29,395.22	111.0735	28,990.19	405.03- 280.04 C 685.07- I
421.0000	LONZA GROUP AG CHF1(REGISTERED)	34,970.24	108.8182	45,812.47	10,842.23 2,082.15 C 8,760.08 I
116.0000	SWISS LIFE HOLDING AG CHF5.1	15,253.34	237.1447	27,508.80	12,255.46 4,208.32 C 8,047.14 I
2,917.0000	ROYAL MAIL PLC	24,592.10	8.5321	24,888.29	296.19 184.86 C 111.33 I



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1,050.0000	WOLSELEY ORD GBP0.108030303(POST CON	27,819.99	54.7664	57,504.82	29,684.83
					6,107.48 C 23,577.35 I
1,663.0000	IMI ORD GBP0.2857	25,931.87	25.4254	42,282.56	16,350.69
					4,053.06 C 12,297.63 I
4,962.0000	MELROSE INDUSTRIES PLC NEW ORD GBP0.0011818181	29,814.93	4.4490	22,076.08	7,738.85-
					1,249.15 C 8,988.00- I
118,104.0000	VODAFONE GROUP PLC	523,008.13	3.3342	393,783.24	129,224.89-
					39,866.32 C 169,091.21- I
2,728.0000	RSA INSURANCE GROUP PLC	27,001.95	8.1183	22,146.90	4,855.05-
					2,352.18 C 7,207.23- I
944.0000	AGGREKO ORD GBP0.048329113924	25,912.31	28.2125	26,632.62	720.31
					1,777.22 C 1,056.91- I
2,804.0000	REXAM NEW ORD GBP0.8035714	15,980.90	9.1476	25,650.14	9,669.24
					2,724.24 C 6,945.00 I
236.0000	KAZAKHMYS ORD GBP0.20	961.13	5.1996	1,227.13	266.00
					79.23 C 186.77 I



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1,201.0000	PETROFAC LTD ORD SHS 0.02 USD	26,492.11	20.5694	24,703.96	1,788.15- 2,113.75 C 3,901.90- I
920.0000	LONDON STOCK EXCHANGE GROUP ORD GBP0	30,261.69	34.3166	31,571.35	1,309.66 1,094.94 C 214.72 I
360.0000	RANDGOLD RESOURCES ORD USD0.05	28,734.77	83.3209	29,995.56	1,260.79 3,185.77 C 1,924.98- I
5,067.0000	G4S PLC ORD GBP0.25	20,697.34	4.3635	22,110.04	1,412.70 2,348.26 C 935.56- I
4,805.0000	SAINSBURY (J) ORD GBP0.2857142 (POST REC	24,323.20	5.3945	25,920.95	1,597.75 2,753.02 C 1,155.27- I
754.0000	ADMIRAL GROUP ORD GBP0.001	15,434.59	26.4855	19,970.12	4,535.53 2,120.99 C 2,414.54 I
16,894.0000	ROYAL DUTCH SHELL PLC A SHS	514,055.52	41.3527	698,612.89	184,557.37 70,004.60 C 114,552.77 I
11,613.0000	ROYAL DUTCH SHELL PLC B SHS	333,351.83	43.4729	504,851.22	171,499.39 51,446.14 C 120,053.25 I



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20,508.0000	CENTRICA ORD GBP0.061728395	93,754.89	5.3449	109,615.08	15,860.19 11,642.01 C 4,218.18 I
4,576.0000	COBHAM ORD GBP0.025	18,670.79	5.3398	24,435.21	5,764.42 2,595.21 C 3,169.21 I
1,362.0000	BUNZL ORD GBP0.3214857	15,489.17	27.7337	37,773.39	22,284.22 4,011.83 C 18,272.39 I
15,564.0000	NATIONAL GRID PLC NEW ORD GBP0.11395	149,133.37	14.3627	223,541.69	74,408.32 22,952.94 C 51,455.38 I
1,745.0000	INMARSAT ORD EUR0.000667	20,380.65	12.7811	22,303.08	1,922.43 2,368.77 C 446.34- I
945.0000	SEVERN TRENT ORD GBP0.9789	17,543.38	33.0343	31,217.42	13,674.04 3,315.54 C 10,358.50 I
700.0000	WHITBREAD ORD GBP0.76797385	16,104.15	75.3872	52,771.10	36,666.95 5,604.72 C 31,062.23 I
3,705.0000	THOMAS COOK GROUP PLC ORD EUR0.01	13,378.24	2.2826	8,457.23	4,921.01- 898.23 C 5,819.24- I



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1,393.0000	HARGREAVES LANSDOWN ORD GBP0.004 (WI)	20,629.75	21.1679	29,486.94	8,857.19
					3,112.78 C 5,744.41 I
1,558.0000	SMITHS GROUP PLC ORD GBP0.375	27,438.02	22.1767	34,551.38	7,113.36
					3,669.63 C 3,443.73 I
6,986.0000	ANGLO AMERICAN USD0.54(POST CONSOLIDATION)	280,671.68	24.4508	170,813.67	109,858.01-
					16,919.53 C 126,777.54- I
3,878.0000	3I GROUP PLC ORD GBP0.738636	17,485.67	6.8718	26,649.17	9,163.50
					2,830.36 C 6,333.14 I
3,263.0000	TUI TRAVEL PLC ORD GBP0	15,409.88	6.8052	22,205.38	6,795.50
					2,358.39 C 4,437.11 I
5,871.0000	UNILEVER PLC ORD GBP0.031111	185,970.11	45.3281	266,121.41	80,151.30
					26,211.70 C 53,939.60 I
73.0000	SCHNEIDER ELECTRIC SA	17,138.04	94.1290	6,871.42	10,266.62-
					535.81 C 10,802.43- I
8,939.0000	STANDARD LIFE ORD GBP0.10	27,885.93	6.3965	57,178.75	29,292.82
					6,072.85 C 23,219.97 I



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1,835.0000	INVESTEC ORD GBP0.0002	15,212.63	9.2160	16,911.53	1,698.90 1,796.14 C 97.24- I
3,651.0000	HOME RETAIL GROUP ORD GBP0	15,349.87	3.0230	11,037.03	4,312.84- 1,172.22 C 5,485.06- I
4,101.0000	EXPERIAN PLC ORD USD0.10	40,885.10	16.8933	69,279.50	28,394.40 7,358.06 C 21,036.34 I
4,848.0000	REED ELSEVIER ORD GBP0.14	39,186.98	16.0725	77,919.92	38,732.94 8,275.72 C 30,457.22 I
2,242.0000	SHIRE PLC ORD GBP0.05	49,639.68	78.1401	175,190.21	125,550.53 18,606.65 C 106,943.88 I
1,180.0000	FRESNILLO PLC	15,740.56	14.9098	17,593.67	1,853.11 1,868.59 C 15.48- I
2,490.0000	CAPITA PLC	29,655.14	19.5777	48,748.68	19,093.54 5,177.51 C 13,916.03 I
2,980.0000	RECKITT BENCKISER GROUP PLC ORD GBP0.10	166,182.68	87.2023	259,863.00	93,680.32 26,996.49 C 66,683.83 I



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2,725.0000	UNITED UTILITIES GROUP PLC ORD GBP0.05	23,744.01	15.0808	41,095.39	17,351.38
					4,364.66 C 12,986.72 I
48,040.0000	GLENCORE PLC	262,296.99	5.5664	267,410.66	5,113.67
					19,898.93 C 14,785.26- I
3,020.0000	SEGRO PLC	14,757.43	5.9024	17,825.25	3,067.82
					1,893.18 C 1,174.64 I
1,989.0000	CAPITAL & COUNTIES PROPERTIES PLC GBP0.25	3,070.55	5.5689	11,076.70	8,006.15
					1,367.21 C 6,638.94 I
4,504.0000	FRIENDS LIFE GROUP LIMITED	21,955.20	5.3911	24,281.77	2,326.57
					1,211.11 C 1,115.46 I
7,413.0000	ROLLS-ROYCE HLDGS PLC ORD GBP0.20	69,601.92	18.2782	135,497.01	65,895.09
					14,390.90 C 51,504.19 I
1,286.0000	EASYJET ORD GBP0.27285714(POSTCONS)	30,465.81	23.3394	30,014.54	451.27-
					1,177.86 C 1,629.13- I
10,679.0000	ROYAL BANK OF SCOT ORD GBP1 (POST CONS)	66,698.23	5.6151	59,964.17	6,734.06-
					6,356.98 C 13,091.04- I



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819.0000	JOHNSON MATTHEY ORD GBP1.04761 (POST CONSOLIDATION)	23,576.49	53.0053	43,411.38	19,834.89
					4,610.65 C 15,224.24 I
27,563.0000	OLD MUTUAL PLC ORD GBP0.114285714(POST CON	70,310.19	3.3803	93,173.23	22,863.04
					7,968.58 C 14,894.46 I
4,990.0000	SAGE GROUP GBP0.01051948	19,468.25	6.5675	32,771.99	13,303.74
					3,480.66 C 9,823.08 I
5,012.0000	WPP PLC ORD GBP0.10	52,955.76	21.7834	109,178.85	56,223.09
					11,595.68 C 44,627.41 I
6,841.0000	MAN GROUP PLC ORD USD0.03428571	25,693.49	1.7987	12,305.33	13,388.16-
					1,306.93 C 14,695.09- I
962.0000	INTERCONTINENTAL HOTELS GROUP PLC	16,557.39	41.3954	39,822.44	23,265.05
					4,229.45 C 19,035.60 I
7,467.0000	DIRECT LINE INSURANCE GROUP PL	30,167.33	4.6131	34,446.59	4,279.26
					1,194.66 C 3,084.60 I



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1,678.0000	COCA COLA HBC ORD CHF0.10	40,438.60	22.9461	38,503.70	1,934.90- 14,850.19 C 16,785.09- I
5,496.0000	ABERDEEN ASSET MANAGEMENT PLC	20,667.78	7.7610	42,654.50	21,986.72 4,088.70 C 17,898.02 I
1,326.0000	AMEC ORD 50P	16,567.26	20.7746	27,547.22	10,979.96 2,925.73 C 8,054.23 I
1,576.0000	ANTOFAGASTA ORD GBP0.05	26,035.54	13.0461	20,560.74	5,474.80- 2,183.72 C 7,658.52- I
9,775.0000	BHP BILLITON PLC USD0.50	341,996.04	32.3076	315,806.95	26,189.09- 32,231.64 C 58,420.73- I
6,048.0000	ARM HOLDINGS ORD GBP0.0005	40,201.87	15.0637	91,105.73	50,903.86 7,468.54 C 43,435.32 I
3,358.0000	BALFOUR BEATTY ORD GBP0.50	15,258.39	3.9925	13,406.81	1,851.58- 1,423.90 C 3,275.48- I
3,453.0000	BRITISH LAND ORD GBP0.25	25,852.71	12.0116	41,476.40	15,623.69 4,405.15 C 11,218.54 I



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4,555.0000	BRITISH SKY BRDCSTG ORD 50P	42,873.27	15.4570	70,406.84	27,533.57
					7,477.78 C 20,055.79 I
3,537.0000	TULLOW OIL PLC ORD GBP0.10	69,680.15	14.5935	51,617.46	18,062.69- 5,482.19 C 23,544.88- I
15,271.0000	AVIVA PLC GBP0.25	95,318.98	8.7287	133,297.27	37,978.29 12,167.96 C 25,810.33 I
599.0000	CRODA INTL ORD 10P	20,951.73	37.6337	22,542.65	1,590.92 2,160.87 C 569.95- I
11,167.0000	DIAGEO ORD 28 101/108P	210,906.45	31.9058	356,292.08	145,385.63 34,773.76 C 110,611.87 I
703.0000	SCHRODERS (NEW) ORD GBP1	15,460.18	42.8488	30,122.74	14,662.56 3,199.27 C 11,463.29 I
14,153.0000	BAE SYSTEMS ORD GBP0.025	81,296.60	7.4019	104,759.67	23,463.07 11,126.33 C 12,336.74 I
8,533.0000	BRITISH AMERICAN TOBACCO ORD GBP0.25	310,249.25	59.4685	507,445.42	197,196.17 51,515.83 C 145,680.34 I



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2,651.0000	FIRSTGROUP ORD5P	11,174.24	2.1646	5,738.55	5,435.69- 609.48 C 6,045.17- I
2,808.0000	HAMMERSON ORD 25P REITS	17,045.50	9.9171	27,847.30	10,801.80 2,957.62 C 7,844.18 I
10,959.0000	STANDARD CHARTERED ORD USD0.50	293,606.98	20.4156	223,734.66	69,872.32- 21,369.99 C 91,242.31- I
4,865.0000	IMPERIAL TOBACCO GROUP ORD 10P	155,605.53	44.9690	218,774.45	63,168.92 21,201.63 C 41,967.29 I
4,350.0000	SABMILLER PLC	144,467.09	57.9297	251,994.27	107,527.18 24,234.03 C 83,293.15 I
7,415.0000	COMPASS GROUP ORD GBP0.10	60,562.24	17.3891	128,940.73	68,378.49 13,694.56 C 54,683.93 I
85,798.0000	HSBC HOLDINGS PLC	891,840.82	10.1377	869,794.44	22,046.38- 82,805.59 C 104,851.97- I
23,434.0000	LEGAL & GENERAL GROUP ORD 2.5P	31,960.39	3.8540	90,314.69	58,354.30 9,592.18 C 48,762.12 I
3,215.0000	MEGGITT ORD5P	20,208.46	8.6518	27,815.67	7,607.21 1,629.24 C 5,977.97 I



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8,476.0000	MORRISON (W) SUPMKT ORD 10P	38,424.36	3.1358	26,579.58	11,844.78- 2,822.97 C 14,667.75- I
1,425.0000	ASSOCIATED BRITISH FOODS PLC	21,504.73	52.1333	74,289.99	52,785.26 7,890.18 C 44,895.08 I
3,241.0000	PEARSON ORD GBP0.25	51,995.87	19.7316	63,950.34	11,954.47 6,792.04 C 5,162.43 I
1,329.0000	PERSIMMON ORD 10P	29,999.89	21.7663	28,927.53	1,072.36- 457.63 C 1,529.99- I
5,722.0000	INTU PROPERTIES PLC GBP0.50	36,174.99	5.3278	30,486.20	5,688.79- 2,557.05 C 8,245.84- I
11,578.0000	PRUDENTIAL PLC GBP0.05	118,242.92	22.9290	265,472.99	147,230.07 25,006.80 C 122,223.27 I
5,483.0000	RIO TINTO PLC	337,568.45	53.1506	291,425.23	46,143.22- 30,951.74 C 77,094.96- I
1,091.0000	TRAVIS PERKINS ORD GBP0.10	31,676.93	28.0073	30,556.01	1,120.92- 1,728.98 C 2,849.90- I
4,995.0000	SSE PLC	93,026.19	26.7933	133,832.78	40,806.59 12,116.28 C 28,690.31 I



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1,962.0000	SERCO GROUP ORD 2P	18,196.55	6.2495	12,261.52	5,935.03- 1,302.27 C 7,237.30- I
84,462.0000	BP PLC ORD USD.25	787,473.90	8.8040	743,604.94	43,868.96- 76,173.92 C 120,042.88- I
251,596.0000	LLOYDS BANKING GROUP PLC GBP0.1	266,334.33	1.2695	319,417.13	53,082.80 26,518.25 C 26,564.55 I
2,992.0000	TATE & LYLE ORD 25P	30,952.59	11.7039	35,018.14	4,065.55 3,067.94 C 997.61 I
15,141.0000	BG GROUP PLC ORD GBP0.10	274,972.08	21.1166	319,727.16	44,755.08 32,117.38 C 12,637.70 I
36,745.0000	TESCO ORD 5P	244,027.69	4.8593	178,558.42	65,469.27- 17,921.17 C 83,390.44- I
3,541.0000	SMITH & NEPHEW ORD USD0.20	35,478.79	17.7653	62,907.07	27,428.28 6,681.23 C 20,747.05 I
22,040.0000	GLAXOSMITHKLINE ORD GBP0.25	436,999.80	26.7420	589,394.87	152,395.07 60,003.38 C 92,391.69 I



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1,089.0000	WEIR GROUP ORD 12.5P	30,616.68	44.7809	48,766.48	18,149.80 4,563.35 C 13,586.45 I
1,480.0000	BABCOCK INTL GROUP ORD GBP0.60	29,960.09	19.8684	29,405.32	554.77- 1,663.87 C 2,218.64- I
5,886.0000	ASTRAZENECA ORD USD0.25	271,225.81	74.2160	436,835.61	165,609.80 44,046.12 C 121,563.68 I
7,326.0000	GKN ORD GBP0.01	20,170.55	6.2084	45,483.22	25,312.67 3,620.35 C 21,692.32 I
36,108.0000	BT GROUP ORD GBP0.05	89,455.76	6.5812	237,634.42	148,178.66 21,421.97 C 126,756.69 I
337.0000	ASSEENONSCREEN HLDGS ORD GBP0.035	28,749.39	50.6115	17,056.10	11,693.29- 591.54 C 12,284.83- I
668.0000	CARNIVAL PLC ORD USD1.66	27,891.15	37.7534	25,219.33	2,671.82- 2,678.49 C 5,350.31- I
6,315.0000	MARKS & SPENCER GROUP ORD GBP0.25	36,090.63	7.2702	45,911.83	9,821.20 4,876.21 C 4,944.99 I



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70,289.0000	BARCLAYS ORD GBP0.25	350,088.77	3.6385	255,750.80	94,337.97- 24,341.93 C 118,679.90- I
680.0000	INTERTEK GROUP PLC ORD GBP0.01	19,764.86	47.0037	31,962.57	12,197.71 2,990.90 C 9,206.81 I
3,040.0000	WILLIAM HILL PLC	20,061.83	5.6083	17,049.26	3,012.57- 1,887.55 C 4,900.12- I
1,734.0000	BURBERRY GROUP ORD GBP0.0005	19,319.59	25.3570	43,969.17	24,649.58 4,669.91 C 19,979.67 I
3,023.0000	LAND SECS GP ORD GBP0.10 REITS	31,496.72	17.7140	53,549.56	22,052.84 5,687.41 C 16,365.43 I
788.0000	NEXT GROUP ORD GBP0.10	26,435.13	110.7127	87,241.68	60,806.55 9,265.79 C 51,540.76 I
9,439.0000	KINGFISHER ORD GBP0.157142857	31,461.78	6.1383	57,939.99	26,478.21 6,153.69 C 20,324.52 I
546.0000	VEDANTA RESOURCES PLC	24,022.50	18.9622	10,353.38	13,669.12- 1,099.61 C 14,768.73- I
2,632.0000	ICAP ORD GBP0.10	15,271.95	6.4974	17,101.24	1,829.29 1,816.28 C 13.01 I



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22,151.0000	ITV ORD GBP0.10	20,171.78	3.0469	67,493.05	47,321.27 5,774.92 C 41,546.35 I
1,329.0000	PERSIMMON C SHARE INCOME NPV	1,562.07	1.1968	1,590.67	28.60 C
57,111.0000	BK OF IRELAND ORD STK EUR0.1	19,735.97	0.3381	19,313.80	422.17- 134.01 C 556.18- I
3,594.0000	CRH ORD EUR0.32 DUBLIN LIST	91,733.03	25.6578	92,214.39	481.36 491.82 C 10.46- I
805.0000	KERRY GROUP 'A' ORD EUR0.125 DUBLIN LISTING	25,659.93	75.0978	60,453.79	34,793.86 679.96 C 34,113.90 I
13,000.0000	FIH MOBILE LIMITED	14,236.69	0.6348	8,252.53	5,984.16- 17.96 C 6,002.12- I
1,500.0000	KERRY LOGISTICS NETWORK LTD	1,567.21	1.5792	2,368.93	801.72 0.70 C 801.02 I
583.0000	SUN HUNG KA-CW16 WTS EXP 22-APR-2016	201.76	1.3057	761.25	559.49 1.33 C 558.16 I
13,360.0000	LINK REAL ESTATE INVT TRUST UNITS	57,751.01	5.3804	71,882.17	14,131.16 102.44 C 14,028.72 I



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12,000.0000	SJM HOLDINGS LIMITED HKD1.00	18,850.68	2.5056	30,068.32	11,217.64 109.20 C 11,108.44 I
10,800.0000	WYNN MACAU LTD	41,156.90	3.9224	42,361.96	1,205.06 16.39 C 1,188.67 I
53,600.0000	AIA GROUP LTD	179,687.72	5.0255	269,371.06	89,683.34 480.37 C 89,202.97 I
10,000.0000	SANDS CHINA LTD	16,457.09	7.5544	75,544.98	59,087.89 164.35 C 58,923.54 I
2,100.0000	SWIRE PROPERTIES LTD	3,862.12	2.9224	6,137.14	2,275.02 13.75 C 2,261.27 I
9,000.0000	HANG LUNG PROPERTIES LTD	36,833.58	3.0837	27,753.59	9,079.99- 60.39 C 9,140.38- I
6,000.0000	BANK OF EAST ASIA HK\$2.50	22,333.57	4.1482	24,889.20	2,555.63 54.15 C 2,501.48 I
8,500.0000	CLP HLDGS HKD5	61,660.43	8.2060	69,751.69	8,091.26 151.78 C 7,939.48 I
8,000.0000	CATHAY PACIFIC AIRWAYS HK\$0.20	16,985.59	1.8683	14,946.42	2,039.17- 32.52 C 2,071.69- I



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6,000.0000	CHEUNG KONG(HLDGS) HK\$0.50	79,312.73	17.7411	106,446.81	27,134.08 231.62 C 26,902.46 I
4,000.0000	CHEUNG KONG INFRASTRUCTURE HLDGS HKD1	18,780.87	6.8964	27,585.85	8,804.98 126.84 C 8,678.14 I
4,700.0000	HONG KONG EXCHANGES & CLEARING HKD1	80,061.03	18.6443	87,628.30	7,567.27 190.66 C 7,376.61 I
20,000.0000	LI & FUNG HKD0.025	49,323.59	1.4812	29,624.47	19,699.12- 64.46 C 19,763.58- I
6,000.0000	MTR CORP HKD1	22,820.12	3.8514	23,108.63	288.51 50.28 C 238.23 I
4,000.0000	HANG LUNG GROUP LTD	21,704.61	5.4126	21,650.64	53.97- 47.11 C 101.08- I
3,800.0000	HANG SENG BANK HK\$5	56,485.26	16.3347	62,072.04	5,586.78 234.69 C 5,352.09 I
6,139.0000	HENDERSON LAND DEVELOPMENT CO HK \$2	35,839.84	5.8513	35,921.43	81.59 77.83 C 3.76 I



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6,000.0000	POWER ASSETS HOLDINGS LIMITED	35,939.52	8.7415	52,449.24	16,509.72 114.12 C 16,395.60 I
6,000.0000	WHARF HOLDINGS HK\$1	34,720.99	7.1996	43,198.05	8,477.06 94.00 C 8,383.06 I
34,237.0000	HONG KONG & CHINA GAS CO LTD	59,826.59	2.1882	74,920.43	15,093.84 112.27 C 14,981.57 I
10,000.0000	HUTCHISON WHAMPOA LTD	74,082.07	13.6768	136,768.02	62,685.95 297.58 C 62,388.37 I
10,000.0000	GALAXY ENTERTAINMENT GROUP LTD HKD0.10	18,442.23	7.9996	79,996.39	61,554.16 275.15 C 61,279.01 I
3,000.0000	KERRY PROPERTIES LTD ORD HKD1	16,481.74	3.4966	10,489.85	5,991.89- 22.83 C 6,014.72- I
15,000.0000	BOC HONG KONG HLDG HKD5	36,200.02	2.8966	43,449.65	7,249.63 94.54 C 7,155.09 I
4,500.0000	YUE YUEN INDL HLDG HKD0.25	14,542.29	3.3482	15,067.06	524.77 32.78 C 491.99 I



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11,366.0000	NEW WORLD DEVELOPMENT CO HK\$1	22,273.44	1.1380	12,934.66	9,338.78- 27.57 C 9,366.35- I
6,000.0000	SHANGRI-LA ASIA ORD HK\$1	11,930.56	1.5663	9,398.29	2,532.27- 20.45 C 2,552.72- I
18,600.0000	SINO LAND CO ORD HK\$1.00	31,516.11	1.6463	30,622.62	893.49- 28.44 C 921.93- I
7,000.0000	SUN HUNG KAI PROPERTIES HK\$0.50	101,890.59	13.7155	96,008.57	5,882.02- 167.57 C 6,049.59- I
3,000.0000	SWIRE PACIFIC A HKD0.60	36,741.70	12.3091	36,927.36	185.66 80.35 C 105.31 I
1,500.0000	WING HANG BANK HK\$1	14,087.28	16.1283	24,192.46	10,105.18 52.65 C 10,052.53 I
4,000.0000	WHEELLOCK & CO LTD HKD0.50	12,241.68	4.1740	16,696.02	4,454.34 36.33 C 4,418.01 I
900.0000	SUNTORY BEVERAGE & FOOD LTD	30,641.65	39.2379	35,314.15	4,672.50 1,299.29- C 5,971.79 I



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1,000.0000	TOKYU FUDOSAN HOLDINGS CORP	10,927.62	7.8870	7,887.07	3,040.55- 257.68- C 2,782.87- I
3,000.0000	SEVEN & I HLDG CO LTD NPV	74,071.28	42.1302	126,390.60	52,319.32 9,865.65- C 62,184.97 I
1,500.0000	BANDAI NAMCO HOLDINGS INC NPV	28,614.24	23.4144	35,121.66	6,507.42 1,292.22- C 7,799.64 I
4,500.0000	mitsubishi chemical holdings corp npv	23,285.01	4.4321	19,944.72	3,340.29- 1,556.82- C 1,783.47- I
2,600.0000	DAIICHI SANKYO COMPANY LIMITED NPV	48,360.87	18.6565	48,506.98	146.11 3,786.30- C 3,932.41 I
700.0000	SUMCO CORPORATION NPV	14,794.02	9.1604	6,412.32	8,381.70- 500.53- C 7,881.17- I
500.0000	ELECTRIC POWER DEVELOPMENT CO LTD	15,518.02	32.4761	16,238.09	720.07 1,267.50- C 1,987.57 I
1,200.0000	SEGA SAMMY HLDGS INC NPV	14,488.46	19.6732	23,607.92	9,119.46 1,842.77- C 10,962.23 I



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300.0000	DENA CO LTD NPV	7,420.96	13.5235	4,057.06	3,363.90- 316.67- C 3,047.23- I
1,600.0000	GUNGHO ONLINE ENTERTAINMENT NPV	15,924.32	6.4557	10,329.20	5,595.12- 292.54- C 5,302.58- I
1,000.0000	YAMAGUCHI FIANCIAL GROUP INC NPV	10,806.72	10.5424	10,542.42	264.30- 822.91- C 558.61 I
10,000.0000	AOZORA BANK NPV	22,321.02	3.2871	32,871.03	10,550.01 8,174.19- C 18,724.20 I
3,000.0000	FUKUOKA FINANCIAL GROUP INC NPV	12,808.36	4.8270	14,481.02	1,672.66 1,130.35- C 2,803.01 I
2,800.0000	INPEX CORPORATION	45,235.33	15.2016	42,564.53	2,670.80- 5,992.70- C 3,321.90 I
1,400.0000	ISETAN MITSUKOSHI HOLDINGS LTD NPV	15,338.08	13.0299	18,241.94	2,903.86 1,423.90- C 4,327.76 I
2,100.0000	MS&AD INSURANCE GROUP HOLDINGS	57,126.55	24.1547	50,725.04	6,401.51- 3,959.43- C 2,442.08- I



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2,000.0000	J FRONT RETAILING CO LTD NPV	12,095.00	7.0184	14,036.82	1,941.82 1,095.66- C 3,037.48 I
800.0000	SONY FINANCIAL HOLDINGS INC NPV	12,968.06	17.0574	13,645.92	677.86 1,065.15- C 1,743.01 I
2,300.0000	OTSUKA HOLDINGS CO LTD	65,923.65	30.9955	71,289.67	5,366.02 11,443.17- C 16,809.19 I
300.0000	MEIJI HOLDINGS CO LTD	11,706.38	66.2356	19,870.69	8,164.31 1,551.03- C 9,715.34 I
4,100.0000	DAI-ICHI LIFE INSURANCE CO LTD	51,379.85	14.8956	61,072.01	9,692.16 14,300.00- C 23,992.16 I
1,000.0000	NKSJ HOLDINGS INC	28,568.36	26.9285	26,928.58	1,639.78- 6,190.27- C 4,550.49 I
11,523.0000	JX HOLDINGS INC	63,836.94	5.3501	61,650.13	2,186.81- 12,271.92- C 10,085.11 I
400.0000	JAPAN AIRLINES CO LTD	20,027.27	55.2786	22,111.45	2,084.18 626.21- C 2,710.39 I



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600.0000	NIPPON PAPER INDUSTRIES CO LTD	9,335.19	18.8144	11,288.68	1,953.49 973.81- C 2,927.30 I
800.0000	AISIN SEIKI CO Y50	23,721.54	39.7808	31,824.69	8,103.15 2,484.12- C 10,587.27 I
3,000.0000	AJINOMOTO CO INC Y50	29,769.06	15.6754	47,026.31	17,257.25 3,670.73- C 20,927.98 I
6,000.0000	ANA HOLDINGS INC	17,184.28	2.3592	14,155.27	3,029.01- 1,104.92- C 1,924.09- I
2,000.0000	AMADA Y50	17,141.70	10.1673	20,334.63	3,192.93 1,587.27- C 4,780.20 I
1,600.0000	ASAHI GROUP HOLDINGS LTD	29,760.53	31.3903	50,224.57	20,464.04 3,920.37- C 24,384.41 I
6,000.0000	ASAHI KASEI CORP JPY50	32,835.39	7.6501	45,900.99	13,065.60 3,582.88- C 16,648.48 I
5,000.0000	ASAHI GLASS CO Y50	58,185.93	5.8930	29,465.48	28,720.45- 2,299.98- C 26,420.47- I



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4,000.0000	HIROSHIMA BK Y50	16,950.05	4.7776	19,110.61	2,160.56 1,491.71- C 3,652.27 I
2,000.0000	BANK OF KYOTO Y50	18,227.69	9.0913	18,182.72	44.97- 1,419.28- C 1,374.31 I
5,900.0000	YAHOO JAPAN CORP NPV	22,017.48	4.6197	27,256.30	5,238.82 2,127.54- C 7,366.36 I
400.0000	BENESSE HOLDINGS INC JPY50	17,099.11	43.3838	17,353.54	254.43 1,354.56- C 1,608.99 I
500.0000	TREND MICRO INC JPY50	17,780.52	32.9203	16,460.19	1,320.33- 1,284.84- C 35.49- I
600.0000	NTT DATA CORP JPY5000	19,803.45	38.3988	23,039.34	3,235.89 1,798.38- C 5,034.27 I
8,100.0000	NTT DOCOMO INC	124,571.42	17.0968	138,484.77	13,913.35 7,751.58- C 21,664.93 I
2,500.0000	BRIDGESTONE CO Y50	41,736.30	34.9933	87,483.34	45,747.04 6,828.67- C 52,575.71 I
1,300.0000	BROTHER INDUSTRIES LTD	15,765.03	17.3239	22,521.10	6,756.07 1,757.92- C 8,513.99 I



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5,300.0000	CANON INC NPV	232,093.52	32.5354	172,437.69	59,655.83- 12,437.38- C 47,218.45- I
700.0000	CENTRAL JAPAN RY Y5000	53,139.24	142.6385	99,847.00	46,707.76 7,793.72- C 54,501.48 I
4,000.0000	CHIBA BANK Y50	23,891.90	7.0578	28,231.58	4,339.68 2,203.66- C 6,543.34 I
2,700.0000	CHUBU ELECTRIC PWR Y500	66,922.87	12.4278	33,555.11	33,367.76- 2,619.20- C 30,748.56- I
2,000.0000	CHUGOKU BANK Y50	27,000.83	15.3793	30,758.60	3,757.77 2,400.92- C 6,158.69 I
1,200.0000	CHUGOKU ELECTRIC POWER CO INC Y500	23,661.92	13.6419	16,370.37	7,291.55- 1,277.81- C 6,013.74- I
900.0000	CHUGAI PHARMACEUTL Y50	17,152.34	28.1822	25,364.00	8,211.66 1,979.84- C 10,191.50 I
2,900.0000	RAKUTEN INC NPV	20,995.91	12.9213	37,471.99	16,476.08 2,924.94- C 19,401.02 I



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<u>SHARES/ PAR VALUE</u>	<u>SECURITY DESCRIPTION</u>	<u>COST</u>	<u>PRICE</u>	<u>MARKET VALUE</u>	<u>UNREALIZED GAIN/LOSS</u>
2,400.0000	KDDI CORP Y5000	62,221.16	60.9940	146,385.67	84,164.51 11,426.41- C 95,590.92 I
1,000.0000	DAIHATSU MOTOR CO Y50	9,443.90	17.7779	17,778.00	8,334.10 1,387.70- C 9,721.80 I
400.0000	DAITO TRUST CONSTRUCTION Y50	19,398.86	117.5657	47,026.31	27,627.45 3,670.72- C 31,298.17 I
1,000.0000	DAIKIN INDUSTRIES Y50	42,055.71	63.0965	63,096.59	21,040.88 4,925.12- C 25,966.00 I
3,000.0000	DAI NIPPON PRINTING CO Y50	41,172.00	10.4437	31,331.13	9,840.87- 2,445.61- C 7,395.26- I
3,000.0000	DAIWA HOUSE INDUSTRY CO Y50	33,953.32	20.7294	62,188.44	28,235.12 4,854.22- C 33,089.34 I
7,000.0000	DAIWA SECS GROUP NPV	36,742.85	8.6570	60,599.18	23,856.33 4,730.19- C 28,586.52 I
400.0000	LAWSON INC NPV	17,099.11	75.0209	30,008.39	12,909.28 2,342.37- C 15,251.65 I
4,200.0000	mitsubishi UFJ LEASE & FINANCE CO LTD	15,159.21	5.7450	24,129.11	8,969.90 1,883.45- C 10,853.35 I



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1,700.0000	EAST JAPAN RAILWAY CO Y50000	125,846.42	78.7621	133,895.66	8,049.24 8,831.92- C 16,881.16 I
1,100.0000	EISAI CO Y50	39,468.48	41.8932	46,082.62	6,614.14 3,597.06- C 10,211.20 I
770.0000	SBI HOLDINGS INC NPV	15,166.67	12.2402	9,425.00	5,741.67- 735.69- C 5,005.98- I
4,000.0000	DENKI KAGAKU KOGYO Y50	17,035.22	3.8398	15,359.56	1,675.66- 1,198.91- C 476.75- I
300.0000	FAST RETAILING CO LTD Y50	62,195.46	329.0064	98,701.94	36,506.48 7,952.42- C 44,458.90 I
54,700.0000	MITSUBISHI UFJ FINANCIAL GROUP NPV	286,665.02	6.1300	335,311.19	48,646.17 23,854.21- C 72,500.38 I
3,000.0000	FUJI HEAVY LTD Y50	15,395.58	27.6886	83,065.99	67,670.41 6,483.85- C 74,154.26 I
1,900.0000	FUJIFILM HOLDINGS CORP NPV	66,453.33	27.8860	52,983.56	13,469.77- 4,135.73- C 9,334.04- I



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500.0000	MIRACA HOLDINGS INC	18,947.95	48.4674	24,233.75	5,285.80 5,380.24- C 10,666.04 I
900.0000	FANUC CORP	113,924.48	172.4495	155,204.58	41,280.10 12,870.85- C 54,150.95 I
8,000.0000	FUJITSU NPV	52,468.49	7.4922	59,937.81	7,469.32 4,678.56- C 12,147.88 I
3,000.0000	FURUKAWA ELECTRIC CO LTD	15,714.99	2.1223	6,366.91	9,348.08- 496.98- C 8,851.10- I
2,000.0000	TONEN GEN SEKIYU JPY50	16,886.17	9.4960	18,992.15	2,105.98 1,482.48- C 3,588.46 I
700.0000	NOMURA RESEARCH INSTITUTE NPV	15,949.23	31.4890	22,042.35	6,093.12 1,720.55- C 7,813.67 I
6.0000	NIPPON BUILDING FUND INC	25,552.84	5,843.7391	35,062.43	9,509.59 2,736.87- C 12,246.46 I
4.0000	JAPAN REAL ESTATE INVST CO JPY REAL ESTATE INV REIT	16,758.41	5,823.9967	23,295.99	6,537.58 1,818.42- C 8,356.00 I



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3,000.0000	GUNMA BANK Y50	16,769.05	5.9128	17,738.51	969.46 1,384.62- C 2,354.08 I
3,000.0000	HACHIJUNI BANK LTD/THE	16,960.69	6.1892	18,567.69	1,607.00 1,449.34- C 3,056.34 I
700.0000	HAMAMATSU PHOTONICS NPV	31,350.22	49.0597	34,341.84	2,991.62 114.87 C 2,876.75 I
5,000.0000	HANKYU HANSHIN HOLDINGS INC	23,104.03	5.7055	28,527.71	5,423.68 2,226.80- C 7,650.48 I
700.0000	DENTSU INC NPV	18,595.01	40.7186	28,503.04	9,908.03 2,224.85- C 12,132.88 I
11,900.0000	RESONA HOLDINGS INC	75,384.82	5.8239	69,305.56	6,079.26- 7,113.70- C 1,034.44 I
200.0000	HIROSE ELECTRONICS	23,444.73	148.5612	29,712.25	6,267.52 2,319.25- C 8,586.77 I
400.0000	HISAMITSU PHARM CO NPV	15,012.29	44.7164	17,886.58	2,874.29 1,396.17- C 4,270.46 I
23,000.0000	HITACHI NPV	104,981.69	7.3244	168,461.57	63,479.88 10,807.83- C 74,287.71 I



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700.0000	HITACHI CONSTRUCTION MACHINERY Y50	16,590.18	19.9200	13,944.03	2,646.15- 1,088.43- C 1,557.72- I
800.0000	HOKKAIDO ELE POWER CO INC Y500	15,169.87	7.7291	6,183.31	8,986.56- 482.65- C 8,503.91- I
17,450.0000	SUMITOMO MITSUI TRUST HOLDINGS INC	74,516.10	4.5703	79,752.73	5,236.63 4,856.49- C 10,093.12 I
800.0000	HOKURIKU ELEC PWR CO INC Y500	17,333.34	13.2569	10,605.60	6,727.74- 827.84- C 5,899.90- I
7,300.0000	HONDA MOTOR CO NPV	260,170.20	34.9143	254,874.88	5,295.32- 18,390.37- C 13,095.05 I
1,700.0000	HOYA PENTAX HD CORPORATION	46,372.00	33.2263	56,484.87	10,112.87 4,409.03- C 14,521.90 I
600.0000	IBIDEN CO Y50	20,633.91	20.1372	12,082.33	8,551.58- 943.10- C 7,608.48- I
9,000.0000	IHI CORP Y50	16,385.75	4.6591	41,932.78	25,547.03 3,273.14- C 28,820.17 I



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6,000.0000	ISUZU MOTORS LTD Y50	16,353.81	6.6136	39,682.15	23,328.34 3,097.45- C 26,425.79 I
7,000.0000	ITOCHU CORP Y50	62,082.74	12.8424	89,896.85	27,814.11 7,017.06- C 34,831.17 I
2,000.0000	IYO BANK LTD/THE	18,972.98	10.1080	20,216.18	1,243.20 1,578.01- C 2,821.21 I
2,000.0000	JAPAN STEEL WORKS Y50	23,125.32	4.3828	8,765.61	14,359.71- 684.22- C 13,675.49- I
800.0000	JSR CORP JPY50	16,677.48	17.1561	13,724.89	2,952.59- 1,071.32- C 1,881.27- I
1,000.0000	JGC CORP Y50	17,833.75	30.3834	30,383.50	12,549.75 2,371.64- C 14,921.39 I
5,200.0000	JAPAN TOBACCO INC Y50000	119,227.13	36.4542	189,562.21	70,335.08 12,879.88- C 83,214.96 I
4,000.0000	JOYO BANK Y50	17,674.04	5.3304	21,321.75	3,647.71 1,664.30- C 5,312.01 I
2,600.0000	AEON CO LTD NPV	30,173.64	12.2994	31,978.68	1,805.04 2,496.15- C 4,301.19 I



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7,000.0000	KAJIMA CORP Y50	17,290.75	4.4222	30,956.02	13,665.27 2,416.33- C 16,081.60 I
4,000.0000	KAMIGUMI CO Y50	35,019.04	9.1999	36,799.76	1,780.72 1,353.96- C 3,134.68 I
4,000.0000	KANEKA CORP NPV	23,423.87	6.2583	25,033.32	1,609.45 6,364.48- C 7,973.93 I
3,100.0000	KANSAI ELEC POWER NPV	70,236.23	9.4269	29,223.63	41,012.60- 2,281.11- C 38,731.49- I
3,000.0000	KAO CORP	83,734.73	39.3563	118,069.20	34,334.47 7,297.17- C 41,631.64 I
6,000.0000	KAWASAKI HEAVY INDUSTRIES Y50	16,481.58	3.8102	22,861.66	6,380.08 1,784.51- C 8,164.59 I
4,000.0000	KAWASAKI KISEN KAISHA Y50	16,268.64	2.0926	8,370.76	7,897.88- 653.40- C 7,244.48- I
2,000.0000	KEIKYU CORP	16,375.11	8.9827	17,965.55	1,590.44 1,402.33- C 2,992.77 I
3,000.0000	KEIO CORP Y50	19,995.09	7.8574	23,572.38	3,577.29 1,839.98- C 5,417.27 I



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2,000.0000	KIKKOMAN SHOYU CO Y50	23,529.90	20.8281	41,656.38	18,126.48 3,251.56- C 21,378.04 I
220.0000	KEYENCE CORP NPV	48,358.74	436.2568	95,976.51	47,617.77 7,491.62- C 55,109.39 I
7,000.0000	KINTETSU CORP Y50	21,687.96	3.6424	25,497.26	3,809.30 1,990.23- C 5,799.53 I
4,000.0000	KIRIN HOLDINGSCO LTD Y50	59,325.17	14.4415	57,766.15	1,559.02- 4,509.05- C 2,950.03 I
15,000.0000	KOBE STEEL	32,100.75	1.5004	22,506.29	9,594.46- 1,756.78- C 7,837.68- I
4,500.0000	KOMATSU Y50	97,768.67	23.2170	104,476.58	6,707.91 11,334.97- C 18,042.88 I
800.0000	KONAMI CO JPY50	15,527.61	22.1015	17,681.26	2,153.65 1,380.15- C 3,533.80 I
2,000.0000	KONICA MINOLTA INC	23,572.49	9.8810	19,762.10	3,810.39- 1,542.57- C 2,267.82- I
1,300.0000	JTEKT CORP NPV	15,875.76	16.8501	21,905.14	6,029.38 1,709.85- C 7,739.23 I



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5,000.0000	KUBOTA CORPORATION Y50	46,048.34	14.1750	70,875.08	24,826.74 5,532.29- C 30,359.03 I
1,500.0000	KURARAY CO Y50	20,170.77	12.6745	19,011.89	1,158.88- 1,484.02- C 325.14 I
600.0000	KURITA WATER INDUSTRIES NPV	16,896.81	23.1676	13,900.60	2,996.21- 1,085.04- C 1,911.17- I
1,400.0000	KYOCERA CORP Y50	69,982.82	47.4606	66,444.89	3,537.93- 5,186.48- C 1,648.55 I
2,000.0000	KYOWA HAKKO KIRIN CO LTD	21,017.20	13.5333	27,066.78	6,049.58 2,112.73- C 8,162.31 I
1,600.0000	KYUSHU ELECTRIC POWER CO INC Y500	34,411.16	11.2630	18,020.83	16,390.33- 1,406.65- C 14,983.68- I
2,900.0000	TOKIO MARINE HOLDINGS INC NPV	80,865.14	32.8907	95,383.25	14,518.11 7,445.31- C 21,963.42 I
15.0000	JAPAN RETAIL FUND JAPAN RETAIL FUND INV RETT	30,564.87	2,248.6550	33,729.83	3,164.96 1,241.01- C 4,405.97 I



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990.0000	AEON MALL CO NPV	20,089.28	26.3461	26,082.72	5,993.44 6,631.29- C 12,624.73 I
2,000.0000	JFE HOLDINGS INC NPV	80,704.37	20.6406	41,281.28	39,423.09- 3,222.28- C 36,200.81- I
500.0000	MAKITA CORP Y50	16,981.98	61.7935	30,896.80	13,914.82 2,411.70- C 16,326.52 I
5,900.0000	SUMITOMO MITSUI GR NPV	204,666.52	41.8932	247,170.42	42,503.90 17,549.93- C 60,053.83 I
7,000.0000	MARUBENI CORP Y50	43,972.18	7.3145	51,201.82	7,229.64 3,996.66- C 11,226.30 I
2,100.0000	MARUI GROUP CO LTD Y50	15,628.74	9.6046	20,169.78	4,541.04 1,574.39- C 6,115.43 I
11,100.0000	PANASONIC CORP	151,528.63	12.1810	135,209.51	16,319.12- 9,376.87- C 6,942.25- I
107,500.0000	MIZUHO FINL GP NPV	204,478.36	2.0532	220,719.61	16,241.25 23,482.47- C 39,723.72 I
1,000.0000	CREDIT SAISON CO NPV	15,129.41	20.8084	20,808.45	5,679.04 1,624.25- C 7,303.29 I



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7,900.0000	SOJITZ CORPORATION NPV	15,308.27	1.7669	13,958.84	1,349.43- 1,089.58- C 259.85- I
7,000.0000	MITSUBISHI ESTATE CO LTD	139,720.47	24.6878	172,814.77	33,094.30 10,458.38- C 43,552.68 I
6,600.0000	MITSUBISHI CORP NPV	165,593.03	20.7985	137,270.62	28,322.41- 9,636.23- C 18,686.18- I
3,000.0000	MITSUBISHI GAS & CHEML CO Y50	18,270.28	6.3965	19,189.58	919.30 1,497.88- C 2,417.18 I
8,000.0000	MITSUBISHI ELECTRIC CORP Y50	73,251.46	12.3389	98,711.81	25,460.35 7,705.13- C 33,165.48 I
13,000.0000	MITSUBISHI HEAVY IND NPV	54,672.42	6.2385	81,101.62	26,429.20 6,330.55- C 32,759.75 I
6,000.0000	MITSUBISHI MATERIAL CORP Y50	17,312.04	3.5042	21,025.62	3,713.58 1,641.18- C 5,354.76 I
9,100.0000	MITSUMI & CO Y50	149,663.17	16.0307	145,880.26	3,782.91- 10,122.01- C 6,339.10 I
5,000.0000	MITSUMI CHEMICALS JPY50	15,384.93	2.7343	13,671.59	1,713.34- 1,067.15- C 646.19- I



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5,000.0000	MITSUI O.S.K. LINES JPY50	36,093.38	3.7214	18,607.18	17,486.20- 1,452.41- C 16,033.79- I
4,000.0000	MITSUI FUDOSAN CO Y50	68,694.54	33.7199	134,879.82	66,185.28 10,528.29- C 76,713.57 I
1,500.0000	MITSUBISHI MOTOR CORP Y50	20,282.56	11.0359	16,553.97	3,728.59- 1,292.15- C 2,436.44- I
900.0000	MURATA MANUFACTURING CO NPV	50,690.44	93.5886	84,229.80	33,539.36 6,574.73- C 40,114.09 I
1,000.0000	SEIKO EPSON CORP NPV	15,832.11	42.5447	42,544.79	26,712.68 3,320.92- C 30,033.60 I
2,000.0000	NGK INSULATORS Y50	40,267.01	22.7037	45,407.43	5,140.42 3,544.36- C 8,684.78 I
1,000.0000	N.G.K. SPARK PLUG CO NPV	22,704.78	28.2118	28,211.84	5,507.06 25.04 C 5,482.02 I
400.0000	NINTENDO CO	51,586.08	119.6880	47,875.23	3,710.85- 3,914.66- C 203.81 I
5,000.0000	NISHI-NIPPON CITY BANK LTD NPV	14,479.94	2.4579	12,289.62	2,190.32- 959.29- C 1,231.03- I



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1,900.0000	DENSO CORPORATION NPV	56,338.67	47.7271	90,681.60	34,342.93 7,078.32- C 41,421.25 I
1,000.0000	TAIYO NIPPON SANSO CORP NPV	9,550.37	8.8544	8,854.45	695.92- 691.15- C 4.77- I
800.0000	NIDEC CORP NPV	42,375.12	61.3592	49,087.41	6,712.29 3,831.61- C 10,543.90 I
1,000.0000	NH FOODS LTD	12,882.89	19.5350	19,535.07	6,652.18 1,524.85- C 8,177.03 I
1,100.0000	NISSHIN SEIFUN GROUP INC	13,074.53	11.9342	13,127.68	53.15 1,024.70- C 1,077.85 I
2,000.0000	NIPPON TEL & TEL CORP Y50000	84,217.89	62.3661	124,732.24	40,514.35 9,736.21- C 50,250.56 I
5,000.0000	NIPPON SHEET GLASS CO Y50	14,746.11	1.4115	7,057.89	7,688.22- 550.92- C 7,137.30- I
1,000.0000	NSK LTD ORD	7,953.32	13.0003	13,000.35	5,047.03 1,014.77- C 6,061.80 I
1,000.0000	NISSAN CHEMICAL INDUSTRIES Y50	14,192.47	15.5471	15,547.11	1,354.64 1,213.56- C 2,568.20 I



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400.0000	NISSIN FOODS HOLDINGS CO LTD	13,330.06	51.4288	20,571.54	7,241.48 1,605.75- C 8,847.23 I
600.0000	NITTO DENKO CORP NPV	23,380.84	46.8584	28,115.10	4,734.26 2,194.57- C 6,928.83 I
3,000.0000	NIPPON EXPRESS CO Y50	13,127.77	4.8467	14,540.25	1,412.48 1,134.97- C 2,547.45 I
1,000.0000	NIKON CORP NPV	22,326.78	15.7445	15,744.53	6,582.25- 1,228.97- C 5,353.28- I
1,100.0000	YAMAHA CORP Y50	14,440.55	15.8037	17,384.14	2,943.59 1,356.95- C 4,300.54 I
2,000.0000	MINEBEA CO LTD Y50	12,329.24	11.2334	22,466.81	10,137.57 1,753.68- C 11,891.25 I
32,555.0000	NIPPON STEEL & SUMITOMO METAL NPV	110,382.76	3.1982	104,119.44	6,263.32- 11,611.15- C 5,347.83 I
1,000.0000	NIPPON ELECTRIC GLASS Y50	14,171.17	5.8239	5,824.00	8,347.17- 454.60- C 7,892.57- I



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12,900.0000	NISSAN MOTOR CO Y50	116,689.54	9.4862	122,372.04	5,682.50 8,171.90- C 13,854.40 I
18,000.0000	NOMURA HOLDING NPV	135,247.19	7.0776	127,397.46	7,849.73- 7,669.12- C 180.61- I
6,000.0000	NIPPON YUSEN KK Y50	23,891.90	2.8823	17,294.31	6,597.59- 1,349.94- C 5,247.65- I
300.0000	NITORI HOLDINGS CO LTD	11,339.06	54.6863	16,405.90	5,066.84 1,280.59- C 6,347.43 I
200.0000	ORIENTAL LAND CO JPY50	13,841.12	171.3143	34,262.87	20,421.75 2,674.45- C 23,096.20 I
3,000.0000	NTN CORP Y50	13,574.94	4.3630	13,089.19	485.75- 1,021.70- C 535.95 I
2,000.0000	ODAKYU ELECTRIC RAILWAY CO Y50	16,524.17	9.6244	19,248.80	2,724.63 1,502.51- C 4,227.14 I
3,000.0000	OBAYASHI CORP Y50	13,255.53	7.1368	21,410.59	8,155.06 1,671.25- C 9,826.31 I
4,000.0000	OJI HOLDINGS CORP JPY50	17,674.04	4.1162	16,465.13	1,208.91- 1,285.21- C 76.30 I



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1,000.0000	OLYMPUS CORP Y50	25,292.87	34.4504	34,450.42	9,157.55 6,301.55- C 15,459.10 I
800.0000	OMRON CORP Y50	18,457.66	42.1499	33,719.95	15,262.29 2,632.08- C 17,894.37 I
300.0000	ONO PHARMACEUTICAL CO Y50	13,127.77	88.0509	26,415.28	13,287.51 2,061.91- C 15,349.42 I
6,000.0000	TAIHEIYO CEMENT CORP Y50	25,926.38	4.0274	24,164.65	1,761.73- 889.09- C 872.64- I
5,800.0000	ORIX CORP Y50	65,353.89	16.5737	96,127.53	30,773.64 5,697.51- C 36,471.15 I
7,000.0000	OSAKA GAS CO Y50	24,818.19	4.2051	29,435.86	4,617.67 2,297.68- C 6,915.35 I
6,000.0000	HOKUHOKU FINANCIAL GROUP INC NPV	13,159.71	2.1321	12,793.05	366.66- 998.59- C 631.93 I
300.0000	ALFRESA HLDGS NPV	13,095.82	64.4588	19,337.64	6,241.82 1,509.42- C 7,751.24 I



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8,000.0000	SHINSEI BK NPV	19,198.48	2.2506	18,005.03	1,193.45- 1,183.85- C 9.60- I
2,000.0000	RICOH Y50	32,132.69	11.9145	23,829.03	8,303.66- 1,860.02- C 6,443.64- I
300.0000	RINNAI CORP	23,192.44	96.5401	28,962.05	5,769.61 1,065.59- C 6,835.20 I
1,000.0000	JAPAN EXCHANGE GROUP INC	23,115.52	24.6285	24,628.60	1,513.08 434.18- C 1,947.26 I
2,000.0000	GS YUASA CORP NPV	13,308.77	6.3669	12,733.82	574.95- 993.97- C 419.02 I
2,900.0000	T&D HOLDINGS INC NPV	34,272.73	13.5926	39,418.59	5,145.86 3,076.88- C 8,222.74 I
300.0000	ROHM CO Y50	22,326.78	57.3515	17,205.47	5,121.31- 1,343.00- C 3,778.31- I
200.0000	SMC CORP NPV	27,128.60	267.6077	53,521.54	26,392.94 4,177.74- C 30,570.68 I
4,100.0000	SOFTBANK CORPORATION NPV	131,974.35	74.4583	305,279.10	173,304.75 28,133.69- C 201,438.44 I



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300.0000	SANKYO CO(OTC) NPV	14,485.26	38.4482	11,534.47	2,950.79- 900.35- C 2,050.44- I
400.0000	SANTEN PHARMACEUTICAL CO	12,031.12	56.2657	22,506.29	10,475.17 1,756.76- C 12,231.93 I
800.0000	SECOM CO Y50	35,262.91	61.1026	48,882.09	13,619.18 3,815.57- C 17,434.75 I
2,000.0000	SEKISUI CHEMICAL Y50	13,670.77	11.5788	23,157.79	9,487.02 1,807.63- C 11,294.65 I
2,000.0000	SEKISUI HOUSE NPV	19,888.62	13.7110	27,422.14	7,533.52 2,140.48- C 9,674.00 I
9,000.0000	SHARP CORP Y50	56,890.58	3.2081	28,873.20	28,017.38- 4,133.71- C 23,883.67- I
200.0000	SHIMAMURA NPV	22,096.80	98.3169	19,663.39	2,433.41- 723.46- C 1,709.95- I
700.0000	SHIKOKU ELECTRIC POWER CO INC Y500	19,444.65	13.9578	9,770.49	9,674.16- 762.66- C 8,911.50- I



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1,000.0000	SHIMADZU Y50	8,070.43	9.1703	9,170.33	1,099.90 715.79- C 1,815.69 I
3,000.0000	SHIMIZU CORPORATION Y50	12,520.89	7.0776	21,232.91	8,712.02 1,657.37- C 10,369.39 I
2,100.0000	SHIN-ETSU CHEMICALS CO NPV	122,465.76	60.7867	127,652.14	5,186.38 8,711.69- C 13,898.07 I
1,000.0000	SHIONOGI & CO JPY50	19,058.15	20.8676	20,867.68	1,809.53 1,628.85- C 3,438.38 I
300.0000	SHIMANO INC NPV	13,351.35	110.9520	33,285.62	19,934.27 2,598.16- C 22,532.43 I
1,000.0000	SHISEIDO Y50	21,677.32	18.2320	18,232.07	3,445.25- 1,423.14- C 2,022.11- I
1,700.0000	HULIC CO LTD	28,565.09	13.1780	22,402.65	6,162.44- 824.25- C 5,338.19- I
2,000.0000	SHIZUOKA BANK Y50	17,375.92	10.8089	21,617.89	4,241.97 1,687.41- C 5,929.38 I
6,000.0000	SHOWA DENKO KK Y50	13,543.00	1.4214	8,528.70	5,014.30- 665.72- C 4,348.58- I



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2,900.0000	SHOWA SHELL SEKIYU ORD Y50	19,797.65	11.3617	32,949.02	13,151.37 10,516.07- C 23,667.44 I
4,000.0000	SONY CORP NPV	152,039.37	16.6033	66,413.31	85,626.06- 5,184.01- C 80,442.05- I
700.0000	STANLEY ELECTRIC CO NPV	13,467.41	26.0697	18,248.85	4,781.44 1,424.46- C 6,205.90 I
6,000.0000	SUMITOMO CHEMICAL Y50	29,385.77	3.7806	22,683.97	6,701.80- 1,770.65- C 4,931.15- I
3,000.0000	SUMITOMO ELECTRIC IND NPV	37,434.91	14.0664	42,199.30	4,764.39 3,293.95- C 8,058.34 I
2,000.0000	SUMITOMO HEAVY INDUSTRIES Y50	12,095.00	4.7579	9,515.82	2,579.18- 742.77- C 1,836.41- I
4,000.0000	SUMITOMO METAL MNG NPV	58,163.75	16.2380	64,952.37	6,788.62 2,441.25- C 9,229.87 I
1,820.0000	SUMITOMO REALTY & DEV CO NPV	41,408.61	42.9100	78,096.24	36,687.63 13,738.46- C 50,426.09 I
4,400.0000	SUMITOMO CORP NPV	51,437.85	13.5037	59,416.61	7,978.76 4,637.87- C 12,616.63 I



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2,100.0000	SUMITOMO RUBBER INDUSTRIES Y50	22,012.72	14.4316	30,306.50	8,293.78 7,536.47- C 15,830.25 I
1,000.0000	SURUGA BANK LTD Y50	8,975.43	19.4067	19,406.74	10,431.31 1,514.83- C 11,946.14 I
1,400.0000	SUZUKI MOTOR CO NPV	31,182.97	31.3212	43,849.76	12,666.79 3,422.77- C 16,089.56 I
400.0000	SUZUKEN CO LTD Y50	14,011.47	37.2143	14,885.74	874.27 1,161.93- C 2,036.20 I
600.0000	THK CO Y50	13,095.82	23.5723	14,143.43	1,047.61 1,103.98- C 2,151.59 I
400.0000	TDK CORP	26,830.48	46.8881	18,755.24	8,075.24- 1,463.98- C 6,611.26- I
6,000.0000	TAISEI CORP Y50	13,223.59	5.5377	33,226.40	20,002.81 2,593.54- C 22,596.35 I
1,000.0000	TAKASHIMAYA CO	8,421.78	9.7033	9,703.37	1,281.59 757.41- C 2,039.00 I
3,500.0000	TAKEDA PHARMACEUTICAL CO LTD NPV	152,763.33	46.3846	162,346.38	9,583.05 17,678.47- C 27,261.52 I



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1,000.0000	mitsubishi tanabe pharm corp NPV	14,181.83	14.9745	14,974.58	792.75 1,168.88- C 1,961.63 I
4,000.0000	TEIJIN Y50	13,500.42	2.5072	10,029.12	3,471.30- 782.85- C 2,688.45- I
800.0000	SYSMEX CORP JPY50	26,540.74	37.5598	30,047.87	3,507.13 1,105.54- C 4,612.67 I
1,200.0000	TERUMO CORP Y50	32,579.86	22.3582	26,829.87	5,749.99- 2,094.25- C 3,655.74- I
3,000.0000	TOBU RAILWAY CO Y50	16,545.46	5.2317	15,695.18	850.28- 1,225.11- C 374.83 I
900.0000	TOHO CO Y500	14,383.04	23.4539	21,108.53	6,725.49 1,647.66- C 8,373.15 I
1,700.0000	TOHOKU ELEC PWR Y500	35,403.45	11.7368	19,952.62	15,450.83- 1,557.44- C 13,893.39- I
3,000.0000	TOKYO TATEMONO CO Y50	28,721.76	9.2492	27,747.89	973.87- 1,020.92- C 47.05 I



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9,000.0000	TOKYO GAS CO NPV	39,670.78	5.8437	52,593.65	12,922.87 4,105.30- C 17,028.17 I
600.0000	TOKYO ELECTRON NPV	40,692.89	67.5978	40,558.71	134.18- 3,165.88- C 3,031.70 I
7,926.0000	TOKYU CORP NPV	36,585.38	7.0875	56,175.59	19,590.21 9,969.24- C 29,559.45 I
2,000.0000	TOPPAN PRINTING Y50	17,823.11	7.7390	15,478.01	2,345.10- 1,208.17- C 1,136.93- I
9,000.0000	TORAY INDUSTRIES INC Y50	54,538.06	6.5742	59,167.86	4,629.80 3,461.58- C 8,091.38 I
16,000.0000	TOSHIBA CORP NPV	82,961.54	4.6690	74,705.10	8,256.44- 5,831.24- C 2,425.20- I
2,000.0000	TOTO Y50	13,670.77	13.4741	26,948.32	13,277.55 2,103.51- C 15,381.06 I
1,000.0000	LIXIL GROUP CORPORATION	20,484.86	26.9878	26,987.81	6,502.95 2,106.59- C 8,609.54 I
800.0000	TOYO SEIKAN GROUP HOLDINGS LTD	14,343.65	15.3595	12,287.65	2,056.00- 959.13- C 1,096.87- I



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10,000.0000	MAZDA MOTOR CORP NPV	34,500.56	4.6888	46,888.11	12,387.55 2,123.19- C 14,510.74 I
700.0000	TOYOTA INDUSTRIES CORP Y50	19,884.36	51.6262	36,138.39	16,254.03 2,820.86- C 19,074.89 I
500.0000	TOYODA GOSEI Y50	13,846.44	20.7689	10,384.48	3,461.96- 810.58- C 2,651.38- I
900.0000	TOYOTA TSUSHU CORP Y50	14,287.22	28.7547	25,879.28	11,592.06 2,020.05- C 13,612.11 I
12,200.0000	TOYOTA MOTOR CORP NPV	501,624.24	60.0562	732,686.44	231,062.20 61,592.48- C 292,654.68 I
5,000.0000	UBE INDUSTRIES LTD/JAPAN Y50	13,042.59	1.7373	8,686.64	4,355.95- 678.05- C 3,677.90- I
700.0000	UNICHARM CORP	36,046.02	59.5923	41,714.62	5,668.60 1,985.37- C 7,653.97 I
600.0000	WEST JAPAN RAILWAY CO JPY50000	20,729.73	44.0254	26,415.28	5,685.55 2,061.89- C 7,747.44 I
500.0000	YAKULT HONSHA Y50	13,228.91	50.6391	25,319.58	12,090.67 1,976.36- C 14,067.03 I



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900.0000	YAMAHA MOTOR CO Y50	13,271.50	17.2054	15,484.92	2,213.42 1,208.70- C 3,422.12 I
9,000.0000	ASTELLAS PHARMA INC Y50	65,447.20	13.1385	118,246.88	52,799.68 9,229.98- C 62,029.66 I
1,000.0000	YAMATO HOLDINGS CO LTD NPV	14,096.64	20.7196	20,719.61	6,622.97 1,617.29- C 8,240.26 I
1,000.0000	YASKAWA ELECTRIC MFG Y50	9,294.84	12.1119	12,111.94	2,817.10 945.42- C 3,762.52 I
1,700.0000	YOKOGAWA ELECTRIC CORP Y50	15,004.83	12.6449	21,496.47	6,491.64 1,677.94- C 8,169.58 I
5,000.0000	BANK OF YOKOHAMA Y50	24,488.14	5.7548	28,774.49	4,286.35 2,246.06- C 6,532.41 I
10,000.0000	OVERSEA-CHINESE BKG CORP SGD0.5 (POST SUBDIVISION)	63,536.70	7.6605	76,605.30	13,068.60 8,259.20 C 4,809.40 I
10,818.0000	NOBLE GROUP HKD0.25	15,343.35	1.0989	11,888.39	3,454.96- 1,281.76 C 4,736.72- I



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6,000.0000	SINGAPORE PRESS HLDGS SGD0.20	16,417.82	3.3449	20,069.79	3,651.97 2,163.84 C 1,488.13 I
41,000.0000	SINGAPORE TELECOMMUNICATIONS SGD0.15 (POST RE-ORGANIZATION)	101,062.13	3.0882	126,619.34	25,557.21 9,675.25 C 15,881.96 I
5,000.0000	SEMBCORP INDUSTRIES SGD0.25 (POST REORGANIZATION)	15,329.04	4.3075	21,537.72	6,208.68 2,322.08 C 3,886.60 I
5,500.0000	KEPPEL CORP NPV	33,809.83	8.6551	47,603.58	13,793.75 5,132.39 C 8,661.36 I
1,540.0000	KEPPEL REIT	1,657.70	1.0267	1,581.20	76.50- 5.64 C 82.14- I
11,000.0000	WILMAR INTERNATIONAL LTD SGD0.5	30,217.05	2.5588	28,147.44	2,069.61- 151.60 C 2,221.21- I
11,000.0000	GLOBAL LOGISTIC PROPERTIES LTD	18,696.79	2.1658	23,823.85	5,127.06 473.87 C 4,653.19 I
51,000.0000	KEPPEL INFRASTRUCTURE TRUST	42,640.80	0.8382	42,750.57	109.77 187.52- C 297.29 I



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7,000.0000	SINGAPORE TECHNOLOGIES ENGINEERING SGD0.10	16,346.20	3.0481	21,337.18	4,990.98
					2,300.46 C 2,690.52 I
8,000.0000	DBS HLDGS SGD1	83,435.79	13.4360	107,488.07	24,052.28
					11,588.84 C 12,463.44 I
2,000.0000	CITY DEVELOPMENTS SGD0.50	15,558.25	8.2059	16,411.98	853.73
					1,769.46 C 915.73- I
5,000.0000	SEMBCORP MARINE SGD0.10	15,364.85	3.2888	16,444.07	1,079.22
					1,772.92 C 693.70- I
1,000.0000	JARDINE CYCLE & CARRIAGE LTD	22,406.17	35.5031	35,503.15	13,096.98
					3,827.78 C 9,269.20 I
6,000.0000	SINGAPORE EXCHANGE SGD0.01	33,222.47	5.5749	33,449.65	227.18
					3,606.37 C 3,379.19- I
11,000.0000	CAPITALAND SGD1	31,832.81	2.5668	28,235.67	3,597.14-
					3,044.24 C 6,641.38- I
23,000.0000	GENTING SINGAPORE PLC USD0.10 CLOB	14,662.87	1.0668	24,537.76	9,874.89
					2,645.54 C 7,229.35 I



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12,000.0000	CAPITAMALL TRUST SGD1 UNITS	15,455.50	1.5842	19,010.95	3,555.45 2,051.14 C 1,504.31 I
11,000.0000	ASCENDAS REAL ESTATE INV TRUST NPV(REAL ESTATE INV TRUSTS)	15,238.53	1.8449	20,294.39	5,055.86 2,194.00 C 2,861.86 I
20,000.0000	COMFORTDELGRO CORP SGD0.25	30,872.78	2.0053	40,107.49	9,234.71 265.56- C 9,500.27 I
2,000.0000	SINGAPORE AIRLINES SGD0.50 (1000 BOARD LOT)	22,234.27	8.3182	16,636.59	5,597.68- 1,793.68 C 7,391.36- I
5,000.0000	UNITED OVERSEAS BANK SG\$1	73,100.51	18.0644	90,322.06	17,221.55 7,580.18 C 9,641.37 I
4,983.0000	BANK HAPOALIM B.M. ILS1	20,845.61	5.7863	28,833.46	7,987.85 2,547.18 C 5,440.67 I
4,637.0000	BANK LEUMI LE ISRAEL B M ORD ILS1	20,151.38	3.9052	18,108.47	2,042.91- 1,599.72 C 3,642.63- I
8,424.0000	BEZEQ-ISRAELI TELECOMMUNICATNS CORP SHK1	18,369.36	1.8753	15,797.69	2,571.67- 1,419.24 C 3,990.91- I



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4,947.0000	ISRAEL CHEMICALS LTD	51,041.58	8.5745	42,418.32	8,623.26- 1,907.54 C 10,530.80- I
701.0000	NICE SYSTEMS SHK1	20,040.18	40.8895	28,663.57	8,623.39 2,455.52 C 6,167.87 I
18.0000	ISRAEL CORP ORD SHK1	22,533.75	570.1786	10,263.22	12,270.53- 50.38- C 12,220.15- I
64.0000	PROTHENA CORP PLC	374.69	22.5500	1,443.20	1,068.51 I
202.0000	PERRIGO CO PLC	31,421.10	145.7600	29,443.52	1,977.58-I
1,352.0000	TRANSOCEAN LTD	61,268.06	45.0300	60,880.56	387.50-I
8,500.0000	NOVO NORDISK A/S-B	135,253.36	46.0221	391,188.57	255,935.21 8,218.27 C 247,716.94 I
281.0000	TRYG A/S	27,504.11	101.0063	28,382.80	878.69 194.91 C 683.78 I
1,500.0000	DSV DKK1 (POST SUBDIVISION)	28,012.01	32.5975	48,896.28	20,884.27 1,566.31 C 19,317.96 I
416.0000	PANDORA A/S	30,445.75	76.6730	31,895.98	1,450.23 25.50- C 1,475.73 I



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1,000.0000	NOVOZYMES A/S	26,215.68	50.1542	50,154.26	23,938.58 1,606.61 C 22,331.97 I
500.0000	COLOPLAST-B	14,432.49	90.4282	45,214.13	30,781.64 426.21- C 31,207.85 I
400.0000	CARLSBERG A/S	35,641.94	107.7095	43,083.82	7,441.88 1,380.13 C 6,061.75 I
30.0000	A P MOLLER - MAERSK A/S DNKR1000	53,911.11	2,484.7572	74,542.72	20,631.61 2,387.85 C 18,243.76 I
10.0000	AP MOLLER MAERSK A/S	15,825.52	2,352.5306	23,525.31	7,699.79 1,111.20 C 6,588.59 I
3,100.0000	DANSKE BANK AS DKK10	66,362.93	28.2634	87,616.62	21,253.69 888.74 C 20,364.95 I
2,435.0000	TDC A/S DKK5	19,944.65	10.3485	25,198.75	5,254.10 1,298.34 C 3,955.76 I
800.0000	VESTAS WIND SYSTEM DKK1	48,315.46	50.4481	40,358.48	7,956.98- 1,456.36 C 9,413.34- I



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511.0000	VALMET CORP	3,882.86	11.9663	6,114.82	2,231.96 68.77 C 2,163.19 I
862.0000	NESTE OIL OYJ EUR3.4	15,247.76	19.5103	16,817.95	1,570.19 189.16 C 1,381.03 I
578.0000	NOKIAN RENKAAT OYJ (NOKIA TYRE NPV	15,030.89	39.0207	22,554.01	7,523.12 253.69 C 7,269.43 I
1,698.0000	KONE CORPORATION NPV ORD B	46,130.14	41.7316	70,860.41	24,730.27 1,027.45 C 23,702.82 I
1,119.0000	ORION OYJ NPV	30,466.09	37.2819	41,718.51	11,252.42 286.41- C 11,538.83 I
381.0000	KESKO OYJ EUR2 SER'B'	14,918.62	39.5273	15,059.92	141.30 169.39 C 28.09- I
672.0000	WARTSILA 'B'EUR3.5	17,489.02	49.5906	33,324.89	15,835.87 374.82 C 15,461.05 I
2,079.0000	UPM-KYMMENE OY NPV	28,102.21	17.0869	35,523.86	7,421.65 399.57 C 7,022.08 I



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2,326.0000	STORA ENSO OYJ SER 'R' NPV	17,232.67	9.7346	22,642.81	5,410.14 254.68 C 5,155.46 I
2,302.0000	SAMPO OYJ SER'A'NPV	75,256.54	50.5900	116,458.39	41,201.85 489.66 C 40,712.19 I
1,776.0000	FORTUM OYJ FIM20	44,019.96	26.8490	47,683.88	3,663.92 536.34 C 3,127.58 I
729.0000	ELISA CORPORATION EUR0.5	15,096.99	30.5868	22,297.79	7,200.80 250.81 C 6,949.99 I
511.0000	METSO OYJ EUR1.70	13,530.68	37.8843	19,358.92	5,828.24 217.76 C 5,610.48 I
14,425.0000	NOKIA (AB) OY EUR0.06	196,623.80	7.5714	109,217.44	87,406.36- 1,452.53 C 88,858.89- I
1,100.0000	SEADRILL LTD USD2	27,004.65	39.6493	43,614.23	16,609.58 1,303.33- C 17,912.91 I
1,350.0000	AKER SOLUTIONS NOK1.66 (POST SUBDIVISION)	17,288.57	17.3720	23,452.24	6,163.67 700.83- C 6,864.50 I



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5,783.0000	ORKLA ASA NOK1.25 (POST SUBDIVISION)	49,832.98	8.9060	51,503.50	1,670.52 2,454.34- C 4,124.86 I
3,550.0000	NORSK HYDRO ASA NOK3.6666	20,112.76	5.3501	18,992.96	1,119.80- 567.56- C 552.24- I
1,597.0000	GJENSIDIGE FORSIKRING ASA	29,962.70	17.9261	28,628.00	1,334.70- 1,184.22- C 150.48- I
1,350.0000	KVAERNER ASA	2,490.12	2.0533	2,772.03	281.91 82.83- C 364.74 I
3,900.0000	DNB ASA	50,032.97	18.2846	71,310.07	21,277.10 2,130.95- C 23,408.05 I
2,900.0000	TELENOR ASA	47,138.07	22.7661	66,021.87	18,883.80 1,972.94- C 20,856.74 I
800.0000	SUBSEA 7 SA	20,074.89	18.6431	14,914.53	5,160.36- 1,901.73- C 3,258.63- I
5,265.0000	STATOIL ASA NOK2.50	125,754.76	30.7025	161,648.88	35,894.12 4,925.50- C 40,819.62 I



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700.0000	YARA INTL NOK1.70	32,290.67	50.0790	35,055.33	2,764.66 924.02- C 3,688.68 I
1,899.0000	ELEKTA SER B NPV	29,475.87	12.7143	24,144.58	5,331.29- 1,330.46- C 4,000.83- I
1,480.0000	KINNEVIK INVESTMENT AB SEK0.1	37,383.49	42.6006	63,048.91	25,665.42 1,371.15 C 24,294.27 I
300.0000	MILLICOM INTL CELL SDR EACH REP 1 USD1.50	27,272.48	91.5434	27,463.03	190.55 1,876.50 C 1,685.95- I
900.0000	ELECTROLUX AB SER 'B' NPV	20,630.04	25.2791	22,751.24	2,121.20 1,554.56 C 566.64 I
2,600.0000	ATLAS COPCO AB SER A NPV (POST SPLIT)	40,128.43	28.8840	75,098.54	34,970.11 5,131.37 C 29,838.74 I
1,400.0000	ATLAS COPCO AB SER'B'NPV (POST SPLIT)	19,457.22	26.7001	37,380.24	17,923.02 2,554.12 C 15,368.90 I
6,732.0000	VOLVO (AB) SER B NPV (POST SPLIT)	76,649.39	13.7689	92,692.32	16,042.93 1,844.84 C 14,198.09 I



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1,400.0000	SKF AB SER B NPV (POST SPLIT)	25,278.63	25.5035	35,704.94	10,426.31 2,439.67 C 7,986.64 I
6,097.0000	SANDVIK AB NPV (POST SPLIT)	81,885.82	13.6567	83,265.06	1,379.24 2,297.72 C 918.48- I
2,200.0000	SVENSKA CELLULOSA AB-SCA SER B NPV (POST SPLIT)	31,042.66	26.0420	57,292.44	26,249.78 3,914.71 C 22,335.07 I
1,300.0000	BOLIDEN AB NPV (POST SPLIT)	20,046.99	14.5018	18,852.42	1,194.57- 55.72- C 1,138.85- I
1,159.0000	HEXAGON AB	19,908.24	32.2197	37,342.64	17,434.40 1,778.64 C 15,655.76 I
2,100.0000	HUSQVARNA AB SER B NPV	15,298.95	7.7707	16,318.52	1,019.57 1,115.01 C 95.44- I
800.0000	RATOS AB SER B NPV	13,496.82	9.2440	7,395.27	6,101.55- 505.30 C 6,606.85- I
800.0000	SSAB AB NPV	14,712.64	9.2964	7,437.16	7,275.48- 508.17 C 7,783.65- I



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365.0000	ETRION CORP	203.18	0.5205	190.00	13.18- 0.24 C 13.42- I
1,200.0000	TELE2 AB-B SHS	15,256.29	11.7720	14,126.41	1,129.88- 965.23 C 2,095.11- I
6,200.0000	SKANDINAVISKA ENSKILDA BANKEN SER A SWKR10	40,284.08	13.3575	82,816.91	42,532.83 5,658.74 C 36,874.09 I
3,854.0000	SWEDBANK AB SEK'A' NPV	62,240.38	26.5057	102,153.04	39,912.66 45.48 C 39,867.18 I
1,200.0000	SWEDISH MATCH AB NPV	28,861.98	34.7027	41,643.29	12,781.31 2,845.42 C 9,935.89 I
13,000.0000	NORDEA BANK AB EURO.39632	133,225.25	14.1054	183,371.10	50,145.85 12,529.43 C 37,616.42 I
1,600.0000	SECURITAS SER 'B' SEK1	17,211.22	11.8542	18,966.85	1,755.63 1,295.98 C 459.65 I
2,000.0000	INVESTOR AB SEK 6.25 'B'	39,124.02	37.4999	74,999.81	35,875.79 5,124.61 C 30,751.18 I



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4,793.0000	HENNES & MAURITZ AB	166,018.59	43.6775	209,346.71	43,328.12 11,419.66 C 31,908.46 I
1,400.0000	ASSA ABLOY SER B NPV	27,660.10	50.8574	71,200.46	43,540.36 4,865.00 C 38,675.36 I
2,611.0000	SVENSKA HANDELSBANKEN SER A NPV	86,207.89	48.9278	127,750.69	41,542.80 5,618.19 C 35,924.61 I
14,394.0000	ERICSSON (L.M.) TELEFONAKTIEBOLAGET SEK1 SER B	157,927.36	12.0786	173,860.08	15,932.72 6,618.71 C 9,314.01 I
9,000.0000	TELIASONERA AB NPV	65,566.90	7.3010	65,709.35	142.45 4,489.81 C 4,347.36 I
1,600.0000	SKANSKA AB B SER 'B' SEK3	29,626.06	22.8110	36,497.72	6,871.66 2,493.83 C 4,377.83 I
2,714.0000	LUNDIN PETROLEUM A ORD	27,580.20	20.2233	54,886.10	27,305.90 969.79 C 26,336.11 I
1,300.0000	ALFA LAVAL AB ORD NPV	19,539.70	25.7578	33,485.16	13,945.46 2,287.99 C 11,657.47 I



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800.0000	GETINGE AB SER'B'NPV	19,207.86	26.2663	21,013.11	1,805.25 1,435.79 C 369.46 I
3,891.0000	TEVA PHARMACEUTICAL INDUSTRIES ADR	196,643.83	52.4200	203,966.22	7,322.39 I
TOTAL INVESTMENTS EQUITY		50,349,025.47		61,173,186.55	10,824,161.08 1,447,098.10 C 9,377,062.98 I
TOTAL INVESTMENT		50,664,534.81		61,682,783.93	11,018,249.12 1,447,688.80 C 9,570,560.32 I



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<u>INVESTMENTS REAL ESTATE</u>					
607.7530	PRIME PROPERTY FUND LLC	6,227,586.17	15,091.4960	9,171,902.00	2,944,315.83
1,418,533.0000	FORTRESS JAPAN OPPORTUNITY DOMESTIC FUND © LP	628,678.00	0.5939	842,583.07	213,905.07
574,064.0000	BRAZIL REAL ESTATE OPPORTUNITIES FUND I I	558,653.96	0.8232	472,575.23	86,078.73-
1,463,026.5900	BROOKFIELD REAL ESTATE FUND	698,169.32	0.5922	866,509.68	168,340.36
1,689,549.2610	EXETER INDUSTRIAL VALUE FUND I I LPP	1,222,922.01	0.8853	1,495,806.96	272,884.95
1,471,453.6400	DIVCOWEST FUND I I I	1,280,067.64	1.2466	1,834,424.47	554,356.83
3,000,000.0000	JAMESTOWN PREMIER PROPERTY	3,000,000.00	1.4742	4,422,705.00	1,422,705.00
1,414,907.0000	BROOKFIELD FAIRFIELD MULTIFAMILY	1,246,990.00	1.1057	1,564,496.63	317,506.63
7,500,000.0000	HEITMAN AMERICA RE TRUST	7,054,615.00	1.1086	8,315,145.00	1,260,530.00
357,080.0000	CVI EUROPE REAL ESTATE PARTNER TG LLC	357,080.00	1.0635	379,779.58	22,699.58
600,000.0000	SAVANNA REAL ESTATE FUND I I A LP LLC	600,000.00	0.9594	575,673.60	24,326.40-
3,548,914.3400	USAA EAGLE REAL ESTATE LP	3,499,186.34	1.1237	3,987,950.53	488,764.19



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6,599,999.0000	PRISA REAL ESTATE LP	6,599,999.00	1.0315	6,808,539.17	208,540.17
83,231.7300	NORTHLIGHT REAL ESTATE OPPORTUNITY FUND	83,231.73	1.0000	83,231.73	0.00
6,000,000.0000	UBS TRUMBULL PROPERTY FUND	5,656,084.68	1.0878	6,527,370.00	871,285.32
1,384,590.2170	TTG BRPTP FUND LP	1,273,879.04	2.0075	2,779,591.17	1,505,712.13
716,400.2600	CITIC CAPITAL CHINA	391,509.59	0.5478	392,468.42	958.83
TOTAL INVESTMENTS REAL ESTATE		40,378,652.48		50,520,752.24	10,142,099.76
TOTAL INVESTMENT		40,378,652.48		50,520,752.24	10,142,099.76



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INVESTMENTS OTHER					
27,865,808.1000	GRESHAM A+ FUND LLC	29,208,972.17	0.8744	24,367,939.00	4,841,033.17-
TOTAL INVESTMENTS OTHER		29,208,972.17		24,367,939.00	4,841,033.17-
TOTAL INVESTMENT		29,208,972.17		24,367,939.00	4,841,033.17-



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INVESTMENT DETAIL
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INVESTMENTS FIXED INCOME SECURITIES					
2,409,850.5080	WTC-CTF JPM PAG EMERGING MARKETS DEBT	23,718,863.64	10.6100	25,568,513.56	1,849,649.92
TOTAL INVESTMENTS FIXED INCOME SECURITIES		23,718,863.64		25,568,513.56	1,849,649.92
TOTAL INVESTMENT		23,718,863.64		25,568,513.56	1,849,649.92



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INVESTMENTS PRIVATE EQUITY					
19,760,300.0700	STEPSTONE XL OPP FUND LP	18,956,191.94	1.2333	24,372,037.94	5,415,846.00
TOTAL INVESTMENTS PRIVATE EQUITY		18,956,191.94		24,372,037.94	5,415,846.00
TOTAL INVESTMENT		18,956,191.94		24,372,037.94	5,415,846.00



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INVESTMENTS OTHER					
14,591,565.1400	GRESHAM COMMODITY FUND CL A1	14,591,565.14	1.0224	14,918,656.32	327,091.18
TOTAL INVESTMENTS OTHER		14,591,565.14		14,918,656.32	327,091.18
TOTAL INVESTMENT		14,591,565.14		14,918,656.32	327,091.18



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<u>INVESTMENTS CASH EQUIVALENTS</u>					
2,753,400.3900	FIDELITY INSTL MM PRIME 690	2,753,400.39	100.0000	2,753,400.39	0.00
TOTAL INVESTMENTS CASH EQUIVALENTS		2,753,400.39		2,753,400.39	0.00
<u>INVESTMENTS FIXED INCOME SECURITIES</u>					
195,000.0000	ALASKA ST HSG FIN CORP 5.000% 12/01/2027 DD 05/30/13	211,116.55	114.0400	222,378.00	11,261.45
650,000.0000	ARIZONA BRD OF RGTS UNIV ARIZO 5.000% 08/01/2030 DD 05/30/13	707,824.67	113.0820	735,033.00	27,208.33
625,000.0000	ARIZONA ST LOTTERY REVENUE 5.000% 07/01/2028 DD 06/15/10	664,913.92	109.3330	683,331.25	18,417.33
615,000.0000	ARIZONA ST TRANSPRTN BRD HIGHW 5.000% 07/01/2035 DD 01/29/13	664,559.95	111.9460	688,467.90	23,907.95
95,000.0000	CALIFORNIA ST 5.050% 12/01/2036 DD 04/01/05	95,463.27	100.7640	95,725.80	262.53
365,000.0000	CHICAGO IL TRANSIT AUTH SALES 5.250% 12/01/2029 DD 11/04/11	421,679.15	111.0690	405,401.85	16,277.30-
75,000.0000	DETROIT MI CITY SCH DIST 5.250% 05/01/2032 DD 08/17/05	79,007.15	113.6240	85,218.00	6,210.85
45,000.0000	DETROIT MI CITY SCH DIST 5.636% 05/01/2016 DD 12/30/09	47,887.82	104.5120	47,030.40	857.42-



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60,000.0000	DETROIT MI CITY SCH DIST 6.252% 05/01/2018 DD 12/30/09	66,175.93	106.9640	64,178.40	1,997.53-
1,315,816.4300	FNMA POOL #0AO4103 3.500% 06/01/2042 DD 06/01/12	1,338,817.51	102.2160	1,344,974.92	6,157.41
1,435,723.5000	FNMA POOL #0AO7284 3.500% 07/01/2042 DD 06/01/12	1,460,820.74	102.2270	1,467,697.06	6,876.32
1,025,983.5800	FNMA POOL #0AQ4086 4.000% 06/01/2043 DD 06/01/13	1,079,155.85	105.6120	1,083,561.78	4,405.93
1,014,357.0500	FNMA POOL #0AO9179 3.500% 07/01/2042 DD 06/01/12	1,028,605.64	102.2260	1,036,936.64	8,331.00
1,326,358.6800	FNMA POOL #0AO9180 3.500% 07/01/2042 DD 06/01/12	1,349,544.16	102.2220	1,355,830.37	6,286.21
1,021,797.5000	FNMA POOL #0AR4445 3.000% 03/01/2043 DD 03/01/13	990,858.79	98.3450	1,004,886.75	14,027.96
465,000.0000	FLORIDA ST HSG FIN CORP REVENUE 4.000% 07/01/2027 DD 12/23/13	465,000.00	105.2950	489,621.75	24,621.75
5,000.0000	GEORGIA-PACIFIC LLC 8.000% 01/15/2024 DD 12/11/03	6,758.31	134.8440	6,742.20	16.11-
137,798.3900	ILLINOIS ST HSG DEV AUTH 3.875% 12/01/2043 DD 10/01/13	137,798.39	104.2110	143,601.08	5,802.69
360,000.0000	LOS ANGELES CNTY CA MET TRANSP 5.000% 07/01/2024 DD 12/18/13	418,916.87	122.1630	439,786.80	20,869.93



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<u>SHARES/ PAR VALUE</u>	<u>SECURITY DESCRIPTION</u>	<u>COST</u>	<u>PRICE</u>	<u>MARKET VALUE</u>	<u>UNREALIZED GAIN/LOSS</u>
320,000.0000	MAINE ST HSG AUTH MTGE REVENUE 2.700% 11/15/2023 DD 02/21/13	320,000.00	96.5690	309,020.80	10,979.20-
150,000.0000	MAINE ST HSG AUTH MTGE REVENUE 3.450% 11/15/2032 DD 02/21/13	148,742.95	97.7300	146,595.00	2,147.95-
155,000.0000	MAINE ST HSG AUTH MTGE REVENUE 4.000% 11/15/2028 DD 07/17/13	155,000.00	104.2730	161,623.15	6,623.15
385,000.0000	MAINE ST HSG AUTH MTGE REVENUE 4.950% 11/15/2028 DD 09/26/13	385,000.00	107.7420	414,806.70	29,806.70
450,000.0000	MASSACHUSETTS ST HSG FIN AGY 3.750% 12/01/2028 DD 03/21/13	450,000.00	97.8240	440,208.00	9,792.00-
160,000.0000	MET GOVT NASHVILLE & DAVIDSONC 5.000% 05/15/2027 DD 06/27/13	182,832.87	117.7090	188,334.40	5,501.53
115,000.0000	MICHIGAN ST 5.000% 12/01/2028 DD 07/01/14	134,880.05	117.9850	135,682.75	802.70
305,000.0000	MINNESOTA ST 5.000% 08/01/2025 DD 08/15/13	343,960.83	121.0500	369,202.50	25,241.67
700,000.0000	MINNESOTA ST HSG FIN AGY 4.875% 07/01/2037 DD 10/26/06	697,580.10	100.7990	705,593.00	8,012.90
70,000.0000	MINNESOTA ST RETMNT SYS BLDG R 4.000% 06/01/2023 DD 08/09/12	74,445.08	112.0900	78,463.00	4,017.92
291,906.9300	MINNESOTA ST HSG FIN AGY HOME0 2.350% 03/01/2043 DD 02/28/13	291,906.93	94.8560	276,891.24	15,015.69-



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<u>SHARES/ PAR VALUE</u>	<u>SECURITY DESCRIPTION</u>	<u>COST</u>	<u>PRICE</u>	<u>MARKET VALUE</u>	<u>UNREALIZED GAIN/LOSS</u>
290,505.7000	MINNESOTA ST HSG FIN AGY HOME0 3.000% 09/01/2043 DD 07/25/13	290,505.70	101.1770	293,924.95	3,419.25
1,280,000.0000	MINNESOTA ST HSG FIN AGY HOME0 3.000% 07/01/2044 DD 06/19/14	1,280,000.00	101.0040	1,292,851.20	12,851.20
5,000.0000	MINNESOTA ST HSG FIN AGY 2.750% 07/01/2023 DD 06/20/13	5,000.00	99.5280	4,976.40	23.60-
120,000.0000	MINNESOTA ST HSG FIN AGY 3.200% 01/01/2025 DD 04/30/14	120,000.00	100.5710	120,685.20	685.20
480,000.0000	MISSOURI ST ENVRNMNTL IMPT & E 5.000% 07/01/2025 DD 11/26/13	553,579.74	121.2110	581,812.80	28,233.06
125,000.0000	MONTANA ST BRD OF HSG 3.350% 12/01/2025 DD 05/30/13	125,000.00	96.6410	120,801.25	4,198.75-
560,000.0000	MONTANA ST BRD OF HSG 3.550% 12/01/2033 DD 05/30/13	560,000.00	100.2150	561,204.00	1,204.00
100,000.0000	MONTANA ST BRD OF HSG 4.650% 12/01/2028 DD 09/26/13	100,000.00	108.2710	108,271.00	8,271.00
615,000.0000	NEBRASKA ST INVESTMENT FIN AUT 3.600% 03/01/2031 DD 05/30/13	615,000.00	98.0280	602,872.20	12,127.80-
100,000.0000	NEBRASKA ST INVESTMENT FIN AUT 3.650% 09/01/2024 DD 11/26/13	100,000.00	104.5190	104,519.00	4,519.00
330,000.0000	NEW JERSEY ST HGR EDU ASSISTAN 3.625% 12/01/2025 DD 06/20/13	310,067.72	97.1950	320,743.50	10,675.78



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<u>SHARES/ PAR VALUE</u>	<u>SECURITY DESCRIPTION</u>	<u>COST</u>	<u>PRICE</u>	<u>MARKET VALUE</u>	<u>UNREALIZED GAIN/LOSS</u>
460,000.0000	NEW JERSEY ST HGR EDU ASSISTAN 3.750% 12/01/2026 DD 06/20/13	451,921.82	97.6900	449,374.00	2,547.82-
690,000.0000	NEW MEXICO ST EDUCTNL ASSISTAN 3.875% 04/01/2034 DD 05/08/13	660,041.98	96.8370	668,175.30	8,133.32
460,000.0000	NEW YORK CITY NY MUNI WTR FINA 5.000% 06/15/2035 DD 06/27/13	500,648.17	112.0200	515,292.00	14,643.83
215,000.0000	NEW YORK ST ENVRNMNTL FACS COR 5.000% 06/15/2024 DD 05/31/12	245,696.94	119.7070	257,370.05	11,673.11
310,000.0000	NEW YORK ST HSG FIN AGY ST PER 5.000% 03/15/2034 DD 06/19/08	314,383.11	110.3420	342,060.20	27,677.09
260,000.0000	NEW YORK ST MTGE AGY REVENUE 3.150% 10/01/2027 DD 04/25/13	260,000.00	96.8530	251,817.80	8,182.20-
130,000.0000	NEW YORK ST THRUWAY AUTH PERSO 5.000% 03/15/2027 DD 09/06/12	145,538.20	115.7790	150,512.70	4,974.50
273,783.0000	OKLAHOMA ST HSG FIN AGY SF MTG 3.350% 09/01/2035 DD 10/30/13	273,783.00	97.1710	266,037.68	7,745.32-
520,000.0000	OMAHA NE 6.500% 12/01/2030 DD 12/01/00	700,945.70	140.7770	732,040.40	31,094.70
125,000.0000	OREGON ST DEPT OF ADMIN SVCS L 5.000% 04/01/2026 DD 04/16/13	136,875.67	118.8290	148,536.25	11,660.58
595,000.0000	OREGON ST HSG & CMNTY SVCS DEP 3.500% 07/01/2028 DD 06/12/13	595,000.00	100.4020	597,391.90	2,391.90



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155,000.0000	PACIFIC BELL TELEPHONE CO 7.125% 03/15/2026 DD 03/15/93	205,331.71	128.3570	198,953.35	6,378.36-
450,000.0000	PENNSYLVANIA ST HSG FIN AGY SF 3.350% 10/01/2023 DD 05/01/13	450,000.00	99.9180	449,631.00	369.00-
95,000.0000	PENNSYLVANIA ST HGR EDUCTNL FA 5.000% 05/15/2031 DD 03/24/10	104,988.08	107.4600	102,087.00	2,901.08-
85,000.0000	PORT OF SEATTLE WA 5.750% 12/01/2025 DD 02/23/11	101,776.73	123.7930	105,224.05	3,447.32
415,000.0000	PUERTO RICO PUBLIC FIN CORP 5.500% 08/01/2027 DD 01/16/02	479,731.35	125.4180	520,484.70	40,753.35
485,000.0000	PUERTO RICO PUBLIC FIN CORP 6.000% 08/01/2026 DD 01/16/02	599,712.48	129.9070	630,048.95	30,336.47
455,000.0000	REGL TRANSPRTN DIST CO SALES T 5.000% 11/01/2029 DD 05/16/13	515,161.73	121.9500	554,872.50	39,710.77
230,000.0000	REGL TRANSPRTN AUTH IL 5.750% 06/01/2034 DD 09/15/04	246,142.82	129.0410	296,794.30	50,651.48
1,085,000.0000	SLM STUDENT LOAN TRUST 200 4 B VAR RT 12/15/2023 DD 07/09/02	1,055,604.37	98.3220	1,066,793.70	11,189.33
905,000.0000	SLM STUDENT LOAN TRUST 200 3 B VAR RT 12/15/2024 DD 03/26/03	873,728.37	97.9120	886,103.60	12,375.23
890,000.0000	SLM STUDENT LOAN TRUST 200 4 B VAR RT 01/27/2025 DD 05/05/04	850,416.95	96.8430	861,902.70	11,485.75



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685,000.0000	SOUTH DAKOTA HSG DEV AUTH 3.550% 11/01/2033 DD 05/30/13	685,000.00	99.1120	678,917.20	6,082.80-
290,000.0000	SOUTH DAKOTA HSG DEV AUTH 4.100% 11/01/2028 DD 11/25/13	290,000.00	105.0790	304,729.10	14,729.10
100,000.0000	SOUTH DAKOTA HSG DEV AUTH 3.250% 05/01/2024 DD 04/30/14	100,000.00	102.0210	102,021.00	2,021.00
425,000.0000	TENNESSEE HSG DEV AGY RSDL FIN 3.000% 07/01/2025 DD 05/30/13	425,000.00	98.3420	417,953.50	7,046.50-
430,000.0000	TENNESSEE HSG DEV AGY RSDL FIN 4.000% 07/01/2043 DD 05/30/13	433,751.49	100.5020	432,158.60	1,592.89-
2,985,800.0000	US TREAS-CPI INFLAT 2.000%001/15/2026 DD 01/15/06	3,852,641.87	117.8200	3,517,869.56	334,772.31-
2,649,792.0000	US TREAS-CPI INFLAT 2.500% 01/15/2029 DD 01/15/09	3,728,288.47	126.1720	3,343,295.56	384,992.91-
987,057.0000	US TREAS-CPI INFLAT 2.125% 02/15/2040 DD 02/15/10	1,462,721.19	127.2270	1,255,803.01	206,918.18-
1,363,778.0000	US TREAS-CPI INFLAT 0.750% 02/15/2042 DD 02/15/12	1,552,366.06	94.1330	1,283,765.14	268,600.92-
185,000.0000	UNIV OF WASHINGTON WA UNIV REV 5.000% 07/01/2030 DD 09/05/13	194,489.84	116.1910	214,953.35	20,463.51
330,000.0000	VERMONT ST STUDENT ASSISTANCEC 3.900% 06/15/2022 DD 07/02/13	330,000.00	100.6060	331,999.80	1,999.80



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680,000.0000	VIRGINIA ST HSG DEV AUTH CMWLT 3.875% 01/01/2038 DD 04/11/13	680,235.55	99.6170	677,395.60	2,839.95-
185,000.0000	WASHINGTON ST HSG FIN COMMISSI 3.150% 06/01/2023 DD 03/27/13	185,000.00	100.2210	185,408.85	408.85
200,000.0000	WASHINGTON ST HSG FIN COMMISSI 3.300% 06/01/2024 DD 03/27/13	200,000.00	99.9350	199,870.00	130.00-
240,000.0000	WASHINGTON ST HSG FIN COMMISSI 4.500% 06/01/2028 DD 01/28/14	240,000.00	105.2960	252,710.40	12,710.40
75,000.0000	WHITE SETTLEMENT TX INDEP SCHD 0.000% 08/15/2036 DD 05/16/13	30,251.92	39.7460	29,809.50	442.42-
225,000.0000	WYOMING ST CMNTY DEV AUTH HSGR 3.150% 12/01/2022 DD 04/11/13	225,000.00	98.7700	222,232.50	2,767.50-
1,535,000.0000	IFL L UL CPURNSA P 2.865% 2033 MAY 02	0.00	0.0000	0.00	0.00
2,950,000.0000	3ML CAP Q/Q 3.50% CALL JAN 26 000.035 ED 010126	0.00	6.9846	206,047.00	206,047.00
4,750,000.0000	3ML CAP Q/Q 3.75% CALL JUL 29 000.0375 ED 070129	0.00	9.0462	429,699.00	429,699.00
1,535,000.0000	IFL L UL CPURNSA INDEX P 2.775% 2033 JUN 07	0.00	0.0000	0.00	0.00
1,535,000.0000	IFL L UL CPURNSA INDEX P 2.7125% 2033 JUN 10	0.00	0.0000	0.00	0.00



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1,535,000.0000	IFL L UL CPURNSA P 2.63% 2028 JUN 14	0.00	0.0000	0.00	0.00
1,535,000.0000	IRS_R US0003M P 6.75% 2038 JUN 19	49,580.50	27.4493	421,348.00	371,767.50
3,000,000.0000	IRS_R US0003M P 6.75% VAR RT 01/27/2034 DD 01/23/14	79,500.00	19.5206	585,619.00	506,119.00
TOTAL INVESTMENTS FIXED INCOME SECURITIES		42,989,662.71		43,884,595.79	894,933.08
TOTAL INVESTMENT		45,743,063.10		46,637,996.18	894,933.08
<u>SHORT FIXED INCOME SECURITIES</u>					
1,535,000.0000-	IFL S UL CPURNSA P 2.865% 2033 MAY 02	0.00	3.8570	59,206.00-	59,206.00-
1,535,000.0000-	IFL S UL CPURNSA INDEX P 2.775% 2033 JUN 07	0.00	1.7225	26,441.00-	26,441.00-
1,535,000.0000-	IFL S UL CPURNSA INDEX P 2.7125% 2033 JUN 10	0.00	0.5008	7,688.00-	7,688.00-
1,535,000.0000-	IFL S UL CPURNSA P 2.63% 2028 JUN 14	0.00	0.1573	2,416.00-	2,416.00-
1,535,000.0000-	IRS_R US0003M P 6.75% 2038 JUN 19	0.00	25.5797	392,649.00-	392,649.00-
3,000,000.0000-	IRS_R US0003M P 6.75% 6.750% 01/27/2034 DD 01/23/14	0.00	17.7924	533,772.00-	533,772.00-



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TOTAL SHORT FIXED INCOME SECURITIES		0.00		1,022,172.00-	1,022,172.00-
<u>WRITTEN OPTIONS FIXED INCOME SECURITIES</u>					
2,950,000.0000-	CPI CAP YOY 3.255% PUT JAN 26 000.03255 ED 010126	0.00	4.4726	131,944.00-	131,944.00-
4,750,000.0000-	CPI CAP YOY 3.41% PUT JUL 29 000.0341 ED 070129	0.00	5.9994	284,976.00-	284,976.00-
1,535,000.0000-	INF CAP UL CPI 3.75% 12/01/26 PUT DEC 26 003.750 ED 12/01/26	84,885.50-	3.9468	60,584.00-	24,301.50
TOTAL WRITTEN OPTIONS FIXED INCOME SECURITIES		84,885.50-		477,504.00-	392,618.50-
TOTAL SHORT INVESTMENT		84,885.50-		1,499,676.00-	1,414,790.50-
TOTAL NET INVESTMENT		45,658,177.60		45,138,320.18	519,857.42-



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INVESTMENTS ALTERNATIVE INVESTMENTS					
24,137,229.0000	TITAN FUND LP	24,137,229.00	1.0231	24,695,759.00	558,530.00
TOTAL INVESTMENTS ALTERNATIVE INVESTMENTS		24,137,229.00		24,695,759.00	558,530.00
TOTAL INVESTMENT		24,137,229.00		24,695,759.00	558,530.00



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INVESTMENTS ALTERNATIVE INVESTMENTS					
8,828.1200	MAGNITUDE US PARTNERS	8,828,124.05	1,052.5745	9,292,254.00	464,129.95
7,489.1500	MAGNITUDE US PARTNERS (SERIES Y)	7,744,789.85	1,052.9494	7,885,696.00	140,906.15
7,557.8600	MAGNITUDE US PARTNERS (SERIES X)	7,769,197.56	1,056.0556	7,981,521.00	212,323.44
91.3900	MAGNITUDE US PARTNERS 041414 SERIES Y	91,387.58	1,009.8479	92,290.00	902.42
TOTAL INVESTMENTS ALTERNATIVE INVESTMENTS		24,433,499.04		25,251,761.00	818,261.96
TOTAL INVESTMENT		24,433,499.04		25,251,761.00	818,261.96



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INVESTMENTS UNIT OF PARTICIPATION					
32,015,736.4560	PRAIRIE #2 QUALIFIED MTU	309,805,857.28	11.5858	370,929,520.22	61,123,662.94
TOTAL INVESTMENTS UNIT OF PARTICIPATION		309,805,857.28		370,929,520.22	61,123,662.94
TOTAL INVESTMENT		309,805,857.28		370,929,520.22	61,123,662.94



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<u>INVESTMENTS CASH EQUIVALENTS</u>					
1,870,667.3700	FIDELITY INSTL MM PRIME 690	1,870,667.37	100.0000	1,870,667.37	0.00
TOTAL INVESTMENTS CASH EQUIVALENTS		1,870,667.37		1,870,667.37	0.00
TOTAL INVESTMENT		1,870,667.37		1,870,667.37	0.00



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<u>INVESTMENTS CASH EQUIVALENTS</u>					
65.4000	BNY MELLON CASH RESERVE 0.010% 12/31/2049 DD 06/26/97	65.40	100.0000	65.40	0.00
285,136.1900	FIDELITY INSTL MM PRIME 690	285,136.19	100.0000	285,136.19	0.00
TOTAL INVESTMENTS CASH EQUIVALENTS		285,201.59		285,201.59	0.00
<u>INVESTMENTS EQUITY</u>					
177.0000	ACTAVIS PLC	14,996.89	223.0500	39,479.85	24,482.96
817.0000	AIRCASTLE LTD SHS	9,958.93	17.7700	14,518.09	4,559.16
817.0000	ALLEGION PLC	17,401.98	56.6800	46,307.56	28,905.58
1,534.0000	ALKERMES PLC	27,727.47	50.3300	77,206.22	49,478.75
1,134.0000	AMDOCS LTD COM	34,523.32	46.3300	52,538.22	18,014.90
2,137.0000	AON CORP	104,734.37	90.0900	192,522.33	87,787.96
1,611.0000	ARCH CAPITAL GROUP LTD SHS	40,345.59	57.4400	92,535.84	52,190.25
189.0000	ARGO GROUP INTERNATIONAL HOLDINGS LTD COM	4,881.35	51.1100	9,659.79	4,778.44
445.0000	ASPEN INSURANCE HOLDINGS LIMITED SHS	11,058.25	45.4200	20,211.90	9,153.65



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1,804.0000	ASSURED GUARANTY LTD SHS	24,191.64	24.5000	44,198.00	20,006.36
814.0000	AXIS CAPITAL HLDGS LTD SHS	25,022.36	44.2800	36,043.92	11,021.56
190.0000	ENERGY XXI BERMUDA LTD	4,007.10	23.6300	4,489.70	482.60
3,820.0000	ACCENTURE PLC	164,380.99	80.8400	308,808.80	144,427.81
1,090.0000	BUNGE LIMITED COM	65,437.24	75.6400	82,447.60	17,010.36
3,116.0000	COVIDIEN PLC	122,434.02	90.1800	281,000.88	158,566.86
1,572.0000	DELPHI AUTOMOTIVE PLC	54,873.45	68.7400	108,059.28	53,185.83
2,819.0000	EATON CORP PLC	147,546.20	77.1800	217,570.42	70,024.22
700.0000	ENDURANCE SPECIALTY HLDGS LTD SHS	25,746.00	51.5900	36,113.00	10,367.00
737.0000	ENDO INTERNATIONAL PLC	26,176.99	70.0200	51,604.74	25,427.75
50.0000	ENSTAR GROUP LIMITED SHS	5,024.00	150.7300	7,536.50	2,512.50
243.0000	EVEREST RE GROUP INC COM	30,805.35	160.4900	38,999.07	8,193.72
2,529.0000	FRUIT OF THE LOOM INC CL A	21,459.36	8.4853	21,459.36	0.00
194.0000	GREENLIGHT CAPITAL RE LTD CL A	4,974.16	32.9400	6,390.36	1,416.20
25.0000	HELEN OF TROY LTD NEW	809.75	60.6300	1,515.75	706.00
866.0000	HERBALIFE LTD	20,641.11	64.5400	55,891.64	35,250.53



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2,452.0000	INGERSOLL-RAND PUBLIC LIMITED COMPANY	68,877.08	62.5100	153,274.52	84,397.44
2,817.0000	INVESCO LTD	69,802.59	37.7500	106,341.75	36,539.16
391.0000	JAZZ PHARMACEUTICALS PLC	20,660.44	147.0100	57,480.91	36,820.47
1,334.0000	LIBERTY GLOBAL PLC	39,291.42	44.2200	58,989.48	19,698.06
913.0000	LIBERTY GLOBAL PLC SHS CL C	22,962.23	42.3100	38,629.03	15,666.80
389.0000	MALLINCKRODT PLC	12,013.83	80.0200	31,127.78	19,113.95
2,454.0000	MARVELL TECHNOLOGY GROUP LTD SHS	24,455.34	14.3300	35,165.82	10,710.48
1,132.0000	MICHAEL KORS HOLDINGS LTD	60,155.49	88.6500	100,351.80	40,196.31
392.0000	MONTPELIER RE HOLDINGS LTD CDT SHS	6,758.08	31.9500	12,524.40	5,766.32
1,635.0000	NABORS INDUSTRIES LTD SHS	26,160.66	29.3700	48,019.95	21,859.29
1,246.0000	NORDIC AMER TANKER SHIPPING	9,830.94	9.5300	11,874.38	2,043.44
388.0000	ONEBEACON INSURANCE GROUP LTD CL A	4,904.32	15.5400	6,029.52	1,125.20
189.0000	PARTNERRE HLDGS LTD BERMUDA COM	12,082.77	109.2100	20,640.69	8,557.92
1,475.0000	PENTAIR PLC	55,187.69	72.1200	106,377.00	51,189.31



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234.0000	PLATINUM UNDERWRITERS HLDGS LTD SHS	7,532.46	64.8500	15,174.90	7,642.44
353.0000	RENAISSANCE RE HOLDINGS LTD	20,092.76	107.0000	37,771.00	17,678.24
1,049.0000	SHIP FINANCE INTL LTD SHS	11,413.12	18.5900	19,500.91	8,087.79
619.0000	SIGNET JEWELERS LTD	19,869.90	110.5900	68,455.21	48,585.31
194.0000	TEXTAINER GROUP HLDGS LTD SHS	5,131.30	38.6200	7,492.28	2,360.98
189.0000	THERAVANCE BIOPHARMA INC	3,706.29	31.8800	6,025.32	2,319.03
843.0000	VALIDUS HOLDINGS LTD COM SHS	23,994.65	38.2400	32,236.32	8,241.67
43.0000	WHITE MOUNTAINS INS GRP INC	17,329.43	608.4400	26,162.92	8,833.49
1,948.0000	XL GROUP PLC	41,278.12	32.7300	63,758.04	22,479.92
2,250.0000	ACE LIMITED SHS	128,618.53	103.7000	233,325.00	104,706.47
189.0000	ALLIED WORLD ASSURANCE COMPANY HOLDINGS AG	5,240.61	38.0200	7,185.78	1,945.17
772.0000	GARMIN LTD	24,240.80	60.9000	47,014.80	22,774.00
1,300.0000	TYCO INTERNATIONAL LTD SHS	24,271.50	45.6000	59,280.00	35,008.50
3,926.0000	MAJICJACK VOCALTEC LTD	60,107.06	15.1200	59,361.12	745.94-
221.0000	ASML HLDG N V N Y REGISTRY SHS NEW 2012	9,161.24	93.2700	20,612.67	11,451.43



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120.0000	CORE LABORATORIES N V	9,681.60	167.0600	20,047.20	10,365.60
549.0000	LYONDELLBASELL INDUSTRIES NV	20,695.93	97.6500	53,609.85	32,913.92
1,207.0000	NIELSEN N V	36,458.86	48.4100	58,430.87	21,972.01
820.0000	QIAGEN N V	15,022.83	24.4500	20,049.00	5,026.17
253.0000	VISTAPRINT NV	8,574.17	40.4600	10,236.38	1,662.21
908.0000	BANCO LATINOAMERICANO DE COMERCIO EXTERIOR	15,408.76	29.6700	26,940.36	11,531.60
204.0000	COPA HOLDINGS S A CL A	12,508.13	142.5700	29,084.28	16,576.15
853.0000	ROYAL CARIBBEAN CRUISES LTD	26,220.69	55.6000	47,426.80	21,206.11
410.0000	AVAGO TECHNOLOGIES LTD	14,185.18	72.0700	29,548.70	15,363.52
1,000.0000	SCORPIO TANKERS INC	4,960.00	10.1700	10,170.00	5,210.00
347.0000	TEEKAY CORPORATION COM	9,879.38	62.2500	21,600.75	11,721.37
220.0000	ABM INDUSTRIES INC	5,005.00	26.9800	5,935.60	930.60
1,296.0000	ADT CORP/THE	31,879.64	34.9400	45,282.24	13,402.60
3,145.0000	AFLAC INC	144,528.80	62.2500	195,776.25	51,247.45
558.0000	AGCO CORP	20,210.76	56.2200	31,370.76	11,160.00
489.0000	AGL RESOURCES INC	20,026.62	55.0300	26,909.67	6,883.05



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1,053.0000	AH BELO CORP	5,201.61	11.8500	12,478.05	7,276.44
2,864.0000	AES CORP/THE	35,050.76	15.5500	44,535.20	9,484.44
4,412.0000	AK STEEL HOLDING CORP	13,236.00	7.9600	35,119.52	21,883.52
299.0000	AMAG PHARMACEUTICALS INC	5,142.80	20.7200	6,195.28	1,052.48
644.0000	AMC NETWORKS INC	28,192.51	61.4900	39,599.56	11,407.05
26,662.0000	AT&T INC	858,155.37	35.3600	942,768.32	84,612.95
477.0000	AV HOMES INC	3,429.63	16.3500	7,798.95	4,369.32
7,956.0000	ABBOTT LABORATORIES	186,195.71	40.9000	325,400.40	139,204.69
10,190.0000	ABBVIE INC	288,024.34	56.4400	575,123.60	287,099.26
810.0000	ACADIA HEALTHCARE CO INC	18,160.20	45.5000	36,855.00	18,694.80
244.0000	ACADIA REALTY TRUST	4,926.36	28.0900	6,853.96	1,927.60
1,737.0000	ACCURIDE CORP	5,488.92	4.8900	8,493.93	3,005.01
164.0000	ACI WORLDWIDE INC	5,180.76	55.8300	9,156.12	3,975.36
389.0000	ACORDA THERAPEUTICS INC	9,180.40	33.7100	13,113.19	3,932.79
2,432.0000	ACTIVISION BLIZZARD INC	28,235.52	22.3000	54,233.60	25,998.08
432.0000	ACTUANT CORP	11,141.28	34.5700	14,934.24	3,792.96
273.0000	ACUITY BRANDS INC	14,927.64	138.2500	37,742.25	22,814.61



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924.0000	ACXIOM CORP	11,400.69	21.6900	20,041.56	8,640.87
3,110.0000	ADOBE SYSTEMS INC	109,409.67	72.3600	225,039.60	115,629.93
199.0000	ADVANCE AUTO PARTS INC	14,959.05	134.9200	26,849.08	11,890.03
190.0000	ADVISORY BOARD CO/THE	5,176.55	51.8500	9,851.50	4,674.95
754.0000	AECOM TECHNOLOGY CORP	15,713.36	32.2000	24,278.80	8,565.44
380.0000	AEGERION PHARMACEUTICALS INC	9,785.00	32.0900	12,194.20	2,409.20
12,695.0000	AEROPOSTALE INC	45,194.20	3.4900	44,305.55	888.65-
2,511.0000	AETNA INC	98,546.20	81.0800	203,591.88	105,045.68
386.0000	AFFILIATED MANAGERS GROUP INC	33,296.10	205.4000	79,284.40	45,988.30
2,530.0000	AGILENT TECHNOLOGIES INC	78,552.06	57.4400	145,323.20	66,771.14
436.0000	AIR LEASE CORP	10,221.40	38.5800	16,820.88	6,599.48
1,484.0000	AIR PRODUCTS & CHEMICALS INC	100,194.60	128.6200	190,872.08	90,677.48
569.0000	AIRGAS INC	29,577.75	108.9100	61,969.79	32,392.04
674.0000	AKAMAI TECHNOLOGIES INC	21,037.25	61.0600	41,154.44	20,117.19
482.0000	AKORN INC	5,258.62	33.2500	16,026.50	10,767.88
582.0000	ALASKA AIR GROUP INC	19,497.00	95.0500	55,319.10	35,822.10
197.0000	ALBANY INTERNATIONAL CORP	4,873.78	37.9600	7,478.12	2,604.34



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6,558.0000	ALCOA INC	58,868.03	14.8900	97,648.62	38,780.59
218.0000	ALERE INC	5,057.60	37.4200	8,157.56	3,099.96
500.0000	ALEXANDER & BALDWIN INC	7,437.14	41.4500	20,725.00	13,287.86
16.0000	ALEXANDER'S INC	5,184.16	369.4700	5,911.52	727.36
431.0000	ALEXION PHARMACEUTICALS INC	23,489.09	156.2500	67,343.75	43,854.66
387.0000	ALIGN TECHNOLOGY INC	8,552.70	56.0400	21,687.48	13,134.78
41.0000	ALLEGHANY CORP	11,979.12	438.1200	17,962.92	5,983.80
166.0000	ALLEGHENY TECHNOLOGIES INC	4,955.10	45.1000	7,486.60	2,531.50
233.0000	ALLEGIANTRAVEL CO	10,876.44	117.7700	27,440.41	16,563.97
1,920.0000	ALLERGAN INC/UNITED STATES	109,077.70	169.2200	324,902.40	215,824.70
267.0000	ALLIANCE DATA SYSTEMS CORP	42,974.26	281.2500	75,093.75	32,119.49
638.0000	ALLIANT ENERGY CORP	28,484.41	60.8600	38,828.68	10,344.27
180.0000	ALLIANT TECHSYSTEMS INC	11,692.80	133.9200	24,105.60	12,412.80
16,166.0000	ALLIED NEVADA GOLD CORP	59,341.83	3.7600	60,784.16	1,442.33
1,129.0000	ALLSCRIPTS HEALTHCARE SOLUTION	14,865.22	16.0500	18,120.45	3,255.23
2,619.0000	ALLSTATE CORP/THE	69,075.82	58.7200	153,787.68	84,711.86
354.0000	ALMOST FAMILY INC	5,200.26	22.0800	7,816.32	2,616.06



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587.0000	ALON USA ENERGY INC	5,165.60	12.4400	7,302.28	2,136.68
13,202.0000	ALPHA NATURAL RESOURCES INC	49,243.46	3.7100	48,979.42	264.04-
2,140.0000	ALTERA CORP	40,354.89	34.7600	74,386.40	34,031.51
11,541.0000	ALTRIA GROUP INC	196,942.13	41.9400	484,029.54	287,087.41
1,679.0000	AMAZON.COM INC	64,342.07	324.7800	545,305.62	480,963.55
142.0000	AMERCO	12,483.47	290.7600	41,287.92	28,804.45
1,403.0000	AMEREN CORP	45,305.43	40.8800	57,354.64	12,049.21
227.0000	AMERICAN ASSETS TRUST INC	5,077.99	34.5500	7,842.85	2,764.86
1,028.0000	AMERICAN AXLE & MANUFACTURING	10,248.04	18.8900	19,418.92	9,170.88
663.0000	AMERICAN CAPITAL LTD	6,066.45	15.2900	10,137.27	4,070.82
2,889.0000	AMERICAN ELECTRIC POWER CO INC	106,435.83	55.7700	161,119.53	54,683.70
1,311.0000	AMERICAN EQUITY INVESTMENT LIF	15,006.03	24.6000	32,250.60	17,244.57
6,060.0000	AMERICAN EXPRESS CO	336,599.50	94.8700	574,912.20	238,312.70
507.0000	AMERICAN FINANCIAL GROUP INC/O	17,542.20	59.5600	30,196.92	12,654.72
4,495.0000	AMERICAN INTERNATIONAL GROUP I	130,742.61	54.5800	245,337.10	114,594.49
604.0000	AMERICAN SOFTWARE INC/GEORGIA	5,031.32	9.8800	5,967.52	936.20
286.0000	AMERICAN STATES WATER CO	5,052.19	33.2300	9,503.78	4,451.59



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2,235.0000	AMERICAN TOWER CORP	99,249.42	89.9800	201,105.30	101,855.88
1,201.0000	AMERICAN WATER WORKS CO INC	30,661.53	49.4500	59,389.45	28,727.92
1,580.0000	AMERISOURCEBERGEN CORP	34,727.76	72.6600	114,802.80	80,075.04
1,712.0000	AMERIPRISE FINANCIAL INC	79,988.74	120.0000	205,440.00	125,451.26
572.0000	AMERIS BANCORP	5,119.40	21.5600	12,332.32	7,212.92
1,519.0000	AMETEK INC	43,068.71	52.2800	79,413.32	36,344.61
4,460.0000	AMGEN INC	247,136.22	118.3700	527,930.20	280,793.98
6,595.0000	AMPIO PHARMACEUTICALS INC	48,898.90	8.3500	55,068.25	6,169.35
1,001.0000	AMPHENOL CORP	38,195.60	96.3400	96,436.34	58,240.74
194.0000	AMSURG CORP	4,974.16	45.5700	8,840.58	3,866.42
272.0000	AMTRUST FINANCIAL SERVICES INC	4,958.94	41.8100	11,372.32	6,413.38
3,241.0000	ANADARKO PETROLEUM CORP	144,222.05	109.4700	354,792.27	210,570.22
1,636.0000	ANALOG DEVICES INC	56,329.18	54.0700	88,458.52	32,129.34
187.0000	ANDERSONS INC/THE	4,965.47	51.5800	9,645.46	4,679.99
183.0000	ANIXTER INTERNATIONAL INC	11,190.45	100.0700	18,312.81	7,122.36
322.0000	ANN INC	8,384.88	41.1400	13,247.08	4,862.20
11,715.0000	ANNALY CAPITAL MANAGEMENT INC	118,550.52	11.4300	133,902.45	15,351.93



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464.0000	ANSYS INC	19,965.92	75.8200	35,180.48	15,214.56
2,320.0000	APACHE CORP	155,919.14	100.6200	233,438.40	77,519.26
756.0000	APARTMENT INVESTMENT & MANAGEM	18,907.56	32.2700	24,396.12	5,488.56
34,445.0000	APPLE INC	404,097.28	92.9300	3,200,973.85	2,796,876.57
146.0000	APPLIED INDUSTRIAL TECHNOLOGIE	4,991.74	50.7300	7,406.58	2,414.84
7,326.0000	APPLIED MATERIALS INC	92,164.92	22.5500	165,201.30	73,036.38
408.0000	APTARGROUP INC	21,403.62	67.0100	27,340.08	5,936.46
1,088.0000	AQUA AMERICA INC	18,661.38	26.2200	28,527.36	9,865.98
4,314.0000	ARCHER-DANIELS-MIDLAND CO	134,913.26	44.1100	190,290.54	55,377.28
1,163.0000	ARES CAPITAL CORP	18,119.54	17.8600	20,771.18	2,651.64
10,053.0000	ARIAD PHARMACEUTICALS INC	64,138.14	6.3700	64,037.61	100.53-
15,136.0000	ARMOUR RESIDENTIAL REIT INC	59,938.56	4.3300	65,538.88	5,600.32
439.0000	ARMSTRONG WORLD INDUSTRIES INC	16,712.73	57.4300	25,211.77	8,499.04
780.0000	ARRIS GROUP INC	8,548.80	32.5300	25,373.40	16,824.60
835.0000	ARROW ELECTRONICS INC	27,989.20	60.4100	50,442.35	22,453.15
223.0000	ARROW FINANCIAL CORP	5,038.04	25.9400	5,784.62	746.58
294.0000	ASBURY AUTOMOTIVE GROUP INC	5,092.08	68.7400	20,209.56	15,117.48



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633.0000	ASHLAND INC	37,034.67	108.7400	68,832.42	31,797.75
533.0000	ASPEN TECHNOLOGY INC	8,240.18	46.4000	24,731.20	16,491.02
1,932.0000	ASSOCIATED BANC-CORP	25,239.94	18.0800	34,930.56	9,690.62
364.0000	ASSURANT INC	10,782.18	65.5500	23,860.20	13,078.02
141.0000	ASTEC INDUSTRIES INC	4,974.48	43.8800	6,187.08	1,212.60
220.0000	ATHENAHEALTH INC	9,033.20	125.1300	27,528.60	18,495.40
2,207.0000	ATMEL CORP	14,690.90	9.3700	20,679.59	5,988.69
310.0000	ATMOS ENERGY CORP	10,104.45	53.4000	16,554.00	6,449.55
406.0000	ATWOOD OCEANICS INC	15,017.94	52.4800	21,306.88	6,288.94
1,401.0000	AUTODESK INC	48,390.54	56.3800	78,988.38	30,597.84
388.0000	AUTOLIV INC	20,859.12	106.5800	41,353.04	20,493.92
2,932.0000	AUTOMATIC DATA PROCESSING INC	126,018.35	79.2800	232,448.96	106,430.61
258.0000	AUTONATION INC	5,462.81	59.6800	15,397.44	9,934.63
99.0000	AUTOZONE INC	32,646.23	536.2400	53,087.76	20,441.53
254.0000	AUXILIUM PHARMACEUTICALS INC	4,859.02	20.0600	5,095.24	236.22
356.0000	AVERY DENNISON CORP	14,939.42	51.2500	18,245.00	3,305.58
397.0000	AVIS BUDGET GROUP INC	10,180.04	59.6900	23,696.93	13,516.89



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365.0000	AVISTA CORP	9,993.70	33.5200	12,234.80	2,241.10
762.0000	AVNET INC	26,822.11	44.3100	33,764.22	6,942.11
181.0000	AXIALL CORP	4,309.61	47.2700	8,555.87	4,246.26
3,591.0000	BB&T CORP	106,769.54	39.4300	141,593.13	34,823.59
317.0000	BOK FINANCIAL CORP	16,582.27	66.6000	21,112.20	4,529.93
25,969.0000	BPZ RESOURCES INC	53,015.71	3.0800	79,984.52	26,968.81
1,026.0000	BABCOCK & WILCOX CO/THE	25,746.40	32.4600	33,303.96	7,557.56
2,020.0000	BAKER HUGHES INC	89,143.26	74.4500	150,389.00	61,245.74
959.0000	BALL CORP	42,591.52	62.6800	60,110.12	17,518.60
273.0000	BALLY TECHNOLOGIES INC	10,240.23	65.7200	17,941.56	7,701.33
132.0000	BANCFIRST CORP	5,043.72	61.9000	8,170.80	3,127.08
1,692.0000	BANCORPSOUTH INC	17,715.24	24.5700	41,572.44	23,857.20
39,653.0000	BANK OF AMERICA CORP	427,030.02	15.3700	609,466.61	182,436.59
453.0000	BANK OF HAWAII CORP	20,583.71	58.6900	26,586.57	6,002.86
1,382.0000	BANK MUTUAL CORP	4,906.10	5.8000	8,015.60	3,109.50
106.0000	BANK OF THE OZARKS INC	1,330.30	33.4500	3,545.70	2,215.40
3,349.0000	BANK OF NEW YORK MELLON CORP/T	90,692.61	37.4800	125,520.52	34,827.91



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788.0000	CR BARD INC	59,162.72	143.0100	112,691.88	53,529.16
343.0000	BARNES GROUP INC	8,046.78	38.5400	13,219.22	5,172.44
279.0000	BILL BARRETT CORP	4,851.81	26.7800	7,471.62	2,619.81
3,510.0000	BAXTER INTERNATIONAL INC	158,827.50	72.3000	253,773.00	94,945.50
1,335.0000	BBCN BANCORP INC	10,325.32	15.9500	21,293.25	10,967.93
657.0000	B/E AEROSPACE INC	19,939.95	92.4900	60,765.93	40,825.98
2,835.0000	BEAZER HOMES USA INC	57,035.25	20.9800	59,478.30	2,443.05
1,540.0000	BECTON DICKINSON AND CO	107,757.80	118.3000	182,182.00	74,424.20
1,569.0000	BED BATH & BEYOND INC	60,608.12	57.3800	90,029.22	29,421.10
450.0000	BELDEN INC	14,878.89	78.1600	35,172.00	20,293.11
1,237.0000	BEMIS CO INC	40,941.61	40.6600	50,296.42	9,354.81
703.0000	BENCHMARK ELECTRONICS INC	10,258.48	25.4800	17,912.44	7,653.96
614.0000	BENEFICIAL MUTUAL BANCORP INC	5,004.10	13.5600	8,325.84	3,321.74
720.0000	WR BERKLEY CORP	20,381.00	46.3100	33,343.20	12,962.20
10,591.0000	BERKSHIRE HATHAWAY INC	877,421.65	126.5600	1,340,396.96	462,975.31
1,441.0000	BEST BUY CO INC	17,464.92	31.0100	44,685.41	27,220.49
555.0000	BIG 5 SPORTING GOODS CORP	5,427.90	12.2700	6,809.85	1,381.95



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500.0000	BIG LOTS INC	10,062.45	45.7000	22,850.00	12,787.55
1,075.0000	BIOGEN IDEC INC	81,363.29	315.3100	338,958.25	257,594.96
166.0000	BLACK HILLS CORP	4,968.38	61.3900	10,190.74	5,222.36
188.0000	BLACKBAUD INC	4,998.92	35.7400	6,719.12	1,720.20
175.0000	BLACKHAWK NETWORK HOLDINGS INC	4,138.74	26.8500	4,698.75	560.01
767.0000	BLACKROCK INC	149,001.38	319.6000	245,133.20	96,131.82
1,867.0000	H&R BLOCK INC	26,637.61	33.5200	62,581.84	35,944.23
4,582.0000	BOEING CO/THE	363,065.84	127.2300	582,967.86	219,902.02
2,798.0000	BON-TON STORES INC/THE	28,791.42	10.3100	28,847.38	55.96
986.0000	BORGWARNER INC	35,820.97	65.1900	64,277.34	28,456.37
58.0000	BOSTON BEER CO INC	5,150.40	223.5200	12,964.16	7,813.76
772.0000	BOSTON PRIVATE FINANCIAL HOLDI	4,701.48	13.4400	10,375.68	5,674.20
212.0000	BOSTON PROPERTIES INC	21,183.82	118.1800	25,054.16	3,870.34
10,921.0000	BOSTON SCIENTIFIC CORP	58,427.35	12.7700	139,461.17	81,033.82
216.0000	BOTTOMLINE TECHNOLOGIES INC	5,080.32	29.9200	6,462.72	1,382.40
1,049.0000	BRANDYWINE REALTY TRUST	12,923.68	15.6000	16,364.40	3,440.72
1,187.0000	BRIGHTCOVE INC	10,113.24	10.5400	12,510.98	2,397.74



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390.0000	BRINKER INTERNATIONAL INC	9,582.30	48.6500	18,973.50	9,391.20
209.0000	BRINK'S CO/THE	5,277.25	28.2200	5,897.98	620.73
10,703.0000	BRISTOL-MYERS SQUIBB CO	278,388.92	48.5100	519,202.53	240,813.61
218.0000	BRISTOW GROUP INC	10,105.34	80.6200	17,575.16	7,469.82
685.0000	BROADRIDGE FINANCIAL SOLUTIONS	14,727.50	41.6400	28,523.40	13,795.90
4,306.0000	BROCADE COMMUNICATIONS SYSTEMS	23,166.28	9.2000	39,615.20	16,448.92
141.0000	BROWN & BROWN INC	3,551.79	30.7100	4,330.11	778.32
756.0000	BROWN-FORMAN CORP	31,184.88	94.1700	71,192.52	40,007.64
488.0000	BROWN SHOE CO INC	5,016.64	28.6100	13,961.68	8,945.04
49.0000	BRUNOS INC NEW	490.00	10.0000	490.00	0.00
1,091.0000	BRUNSWICK CORP/DE	28,145.61	42.1300	45,963.83	17,818.22
334.0000	BUFFALO WILD WINGS INC	23,267.18	165.7100	55,347.14	32,079.96
337.0000	CAI INTERNATIONAL INC	5,203.28	22.0100	7,417.37	2,214.09
336.0000	CBL & ASSOCIATES PROPERTIES IN	5,140.80	19.0000	6,384.00	1,243.20
3,926.0000	CBS CORP	112,606.24	62.1400	243,961.64	131,355.40
332.0000	CBOE HOLDINGS INC	8,004.52	49.2100	16,337.72	8,333.20
1,484.0000	CBRE GROUP INC	34,639.38	32.0400	47,547.36	12,907.98



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411.0000	CF INDUSTRIES HOLDINGS INC	57,479.31	240.5300	98,857.83	41,378.52
1,790.0000	CIGNA CORPORATION COM	70,576.88	91.9700	164,626.30	94,049.42
1,575.0000	CIT GROUP INC	53,802.00	45.7600	72,072.00	18,270.00
114.0000	CLECO CORP	5,062.74	58.9500	6,720.30	1,657.56
2,153.0000	CME GROUP INC	126,827.08	70.9500	152,755.35	25,928.27
3,119.0000	CMS ENERGY CORP	45,324.68	31.1500	97,156.85	51,832.17
216.0000	CSS INDUSTRIES INC	4,965.84	26.3700	5,695.92	730.08
556.0000	CNA FINANCIAL CORP	15,050.92	40.4200	22,473.52	7,422.60
3,355.0000	CNO FINANCIAL GROUP INC	22,180.10	17.8000	59,719.00	37,538.90
86.0000	CSR PLC ADR	1,262.45	40.4700	3,480.42	2,217.97
6,944.0000	CSX CORP	74,903.54	30.8100	213,944.64	139,041.10
368.0000	CST BRANDS INC	7,512.60	34.5000	12,696.00	5,183.40
563.0000	CVB FINANCIAL CORP	4,954.40	16.0300	9,024.89	4,070.49
7,681.0000	CVS CAREMARK CORP	255,508.23	75.3700	578,916.97	323,408.74
7,531.0000	CYS INVTS INC	61,415.23	9.0200	67,929.62	6,514.39
2,339.0000	CA INC	55,360.39	28.7400	67,222.86	11,862.47



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661.0000	CABELA'S INC	21,000.51	62.4000	41,246.40	20,245.89
688.0000	CABLEVISION SYSTEMS CORP	9,595.60	17.6500	12,143.20	2,547.60
567.0000	CABOT CORP	21,028.56	57.9900	32,880.33	11,851.77
148.0000	CABOT MICROELECTRONICS CORP	4,992.04	44.6500	6,608.20	1,616.16
2,632.0000	CABOT OIL & GAS CORP	40,440.68	34.1400	89,856.48	49,415.80
1,694.0000	CADENCE DESIGN SYSTEMS INC	17,295.74	17.4900	29,628.06	12,332.32
472.0000	CALIFORNIA WATER SERVICE GROUP	9,888.40	24.2000	11,422.40	1,534.00
781.0000	CALLAWAY GOLF CO	4,810.96	8.3200	6,497.92	1,686.96
3,645.0000	CALPINE CORP	48,988.80	23.8100	86,787.45	37,798.65
349.0000	CAMDEN PROPERTY TRUST	18,050.28	71.1500	24,831.35	6,781.07
1,782.0000	CAMERON INTERNATIONAL CORP	73,623.33	67.7100	120,659.22	47,035.89
464.0000	CAMPBELL SOUP CO	16,571.64	45.8100	21,255.84	4,684.20
158.0000	CAPELLA EDUCATION CO	4,962.78	54.3900	8,593.62	3,630.84
2,489.0000	CAPITAL ONE FINANCIAL CORP	136,475.25	82.6000	205,591.40	69,116.15
461.0000	CARDINAL FINANCIAL CORP	4,868.16	18.4600	8,510.06	3,641.90
2,130.0000	CARDINAL HEALTH INC	100,998.74	68.5600	146,032.80	45,034.06
272.0000	CARDTRONICS INC	5,937.76	34.0800	9,269.76	3,332.00



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944.0000	CAREFUSION CORP	29,777.06	44.3500	41,866.40	12,089.34
386.0000	CARLISLE COS INC	18,311.84	86.6200	33,435.32	15,123.48
1,674.0000	CARMAX INC	53,654.92	52.0100	87,064.74	33,409.82
636.0000	CARNIVAL CORP	19,998.12	37.6500	23,945.40	3,947.28
547.0000	CARPENTER TECHNOLOGY CORP	20,397.63	63.2500	34,597.75	14,200.12
235.0000	CARRIZO OIL & GAS INC	4,763.45	69.2600	16,276.10	11,512.65
570.0000	CARTER'S INC	23,356.90	68.9300	39,290.10	15,933.20
173.0000	CASEY'S GENERAL STORES INC	9,824.67	70.2900	12,160.17	2,335.50
3,928.0000	CATERPILLAR INC	245,238.78	108.6700	426,855.76	181,616.98
498.0000	CATHAY GENERAL BANCORP	6,957.06	25.5600	12,728.88	5,771.82
484.0000	CAVIUM INC	14,476.84	49.6600	24,035.44	9,558.60
3,780.0000	CBeyond INC	25,515.00	9.9500	37,611.00	12,096.00
1,924.0000	CEDAR REALTY TRUST INC	9,985.56	6.2500	12,025.00	2,039.44
1,095.0000	CELANESE CORP	35,554.65	64.2800	70,386.60	34,831.95
5,680.0000	CELGENE CORP	154,367.88	85.8800	487,798.40	333,430.52
315.0000	CENTENE CORP	10,665.90	75.6100	23,817.15	13,151.25
4,068.0000	CENTERPOINT ENERGY INC	57,228.91	25.5400	103,896.72	46,667.81



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371.0000	CENTRAL PACIFIC FINANCIAL CO	4,889.59	19.8500	7,364.35	2,474.76
1,087.0000	CENTURY ALUMINUM CO	10,065.62	15.6800	17,044.16	6,978.54
389.0000	CEPHEID INC	12,556.92	47.9400	18,648.66	6,091.74
1,984.0000	CERNER CORP	56,304.70	51.5800	102,334.72	46,030.02
2,352.0000	CHANNELADVISOR CORP	62,563.20	26.3600	61,998.72	564.48-
185.0000	CHART INDUSTRIES INC	9,233.35	82.7300	15,305.05	6,071.70
463.0000	CHARTER COMMUNICATIONS INC	25,082.26	158.3800	73,329.94	48,247.68
345.0000	CHEESECAKE FACTORY INC/THE	10,196.63	46.4200	16,014.90	5,818.27
101.0000	CHEMED CORP	5,071.21	93.7200	9,465.72	4,394.51
272.0000	CHEMICAL FINANCIAL CORP	4,972.16	28.0800	7,637.76	2,665.60
244.0000	CHEMTURA CORP	5,043.48	26.1300	6,375.72	1,332.24
647.0000	CHENIERE ENERGY INC	13,872.89	71.7000	46,389.90	32,517.01
873.0000	CHESAPEAKE ENERGY CORP	17,032.02	31.0800	27,132.84	10,100.82
232.0000	CHESAPEAKE LODGING TRUST	5,052.96	30.2300	7,013.36	1,960.40
130.0000	CHESAPEAKE UTILITIES CORP	5,166.20	71.3300	9,272.90	4,106.70
10,942.0000	CHEVRON CORP	708,153.11	130.5500	1,428,478.10	720,324.99
693.0000	CHICAGO BRIDGE & IRON CO NV	24,638.23	68.2000	47,262.60	22,624.37



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1,607.0000	CHICO'S FAS INC	19,348.28	16.9600	27,254.72	7,906.44
113.0000	THE CHILDRENS PLACE INC	4,993.47	49.6300	5,608.19	614.72
12,871.0000	CHIMERA INVESTMENT CORP	34,751.70	3.1900	41,058.49	6,306.79
584.0000	CHINDEX INTERNATIONAL INC	5,156.72	23.6900	13,834.96	8,678.24
228.0000	CHIPOTLE MEXICAN GRILL INC	56,209.41	592.5100	135,092.28	78,882.87
1,412.0000	CHUBB CORP	73,507.03	92.1700	130,144.04	56,637.01
517.0000	CHURCH & DWIGHT CO INC	22,418.42	69.9500	36,164.15	13,745.73
115.0000	CHURCHILL DOWNS INC	4,940.40	90.1100	10,362.65	5,422.25
1,253.0000	CIENA CORP	15,324.19	21.6600	27,139.98	11,815.79
547.0000	CIMAREX ENERGY CO	35,029.49	143.4600	78,472.62	43,443.13
1,640.0000	CINCINNATI BELL INC	5,100.40	3.9300	6,445.20	1,344.80
791.0000	CINCINNATI FINANCIAL CORP	22,258.74	48.0400	37,999.64	15,740.90
586.0000	CINEMARK HOLDINGS INC	11,743.44	35.3600	20,720.96	8,977.52
163.0000	CIRCOR INTERNATIONAL INC	5,251.86	77.1300	12,572.19	7,320.33
19,111.0000	CISCO SYSTEMS INC	407,993.59	24.8500	474,908.35	66,914.76
796.0000	CINTAS CORP	25,280.96	63.5400	50,577.84	25,296.88
12,911.0000	CITIGROUP INC	506,273.14	47.1000	608,108.10	101,834.96



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1,417.0000	CITRIX SYSTEMS INC	52,256.55	62.5500	88,633.35	36,376.80
156.0000	CITY HOLDING CO	4,907.76	45.1200	7,038.72	2,130.96
295.0000	CITY NATIONAL CORP/CA	12,623.05	75.7600	22,349.20	9,726.15
1,072.0000	CIVEO CORP	16,321.87	25.0300	26,832.16	10,510.29
210.0000	CLARCOR INC	10,058.58	61.8500	12,988.50	2,929.92
146.0000	CLEARWATER PAPER CORP	5,212.20	61.7200	9,011.12	3,798.92
893.0000	CLOROX CO	56,914.83	91.4000	81,620.20	24,705.37
166.0000	COCA-COLA BOTTLING CO CONSOLIDATED	10,121.02	73.6700	12,229.22	2,108.20
21,977.0000	COCA-COLA CO/THE	536,421.46	42.3600	930,945.72	394,524.26
2,159.0000	COCA-COLA ENTERPRISES INC	45,726.92	47.7800	103,157.02	57,430.10
320.0000	COGENT COMMUNICATIONS HOLDINGS INC	5,049.60	34.5500	11,056.00	6,006.40
300.0000	COGNEX CORP	5,055.00	38.4000	11,520.00	6,465.00
3,832.0000	COGNIZANT TECHNOLOGY SOLUTIONS	78,146.45	48.9100	187,423.12	109,276.67
157.0000	COHEN & STEERS INC	4,953.35	43.3800	6,810.66	1,857.31
97.0000	COHERENT INC	5,028.48	66.1700	6,418.49	1,390.01
663.0000	COLFAX CORP	25,943.19	74.5400	49,420.02	23,476.83



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5,922.0000	COLGATE-PALMOLIVE CO	185,496.58	68.1800	403,761.96	218,265.38
529.0000	COLUMBIA BANKING SYSTEM INC	9,517.21	26.3100	13,917.99	4,400.78
483.0000	COMFORT SYSTEMS USA INC	5,028.03	15.8000	7,631.40	2,603.37
14,127.0000	COMCAST CORP	346,023.92	53.6800	758,337.36	412,313.44
432.0000	COMERICA INC	15,030.65	50.1600	21,669.12	6,638.47
1,006.0000	COMMERCE BANCSHARES INC/MO	34,146.63	46.5000	46,779.00	12,632.37
550.0000	COMMERCIAL METALS CO	7,887.00	17.3100	9,520.50	1,633.50
442.0000	COMMONWEALTH REIT	9,834.50	26.3200	11,633.44	1,798.94
232.0000	COMMUNITY BANK SYSTEM INC	5,630.64	36.2000	8,398.40	2,767.76
1,023.0000	COMMUNITY HEALTH SYSTEMS INC	18,025.26	45.3700	46,413.51	28,388.25
205.0000	COMMUNITY TRUST BANCORP INC	5,029.95	34.2200	7,015.10	1,985.15
278.0000	COMMVault SYSTEMS INC	11,464.72	49.1700	13,669.26	2,204.54
131.0000	COMPASS MINERALS INTERNATIONAL	9,690.86	95.7400	12,541.94	2,851.08
869.0000	COMPUTER SCIENCES CORP	39,577.82	63.2000	54,920.80	15,342.98
2,985.0000	COMPUWARE CORP	23,442.40	9.9900	29,820.15	6,377.75
191.0000	COMTECH TELECOMMUNICATIONS COR	5,107.34	37.3300	7,130.03	2,022.69
2,460.0000	CONAGRA FOODS INC	60,262.62	29.6800	73,012.80	12,750.18



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145.0000	CON-WAY INC	5,034.40	50.4100	7,309.45	2,275.05
569.0000	CONCHO RESOURCES INC/MIDLAND T	29,690.42	144.5000	82,220.50	52,530.08
472.0000	CONCUR TECHNOLOGIES INC	32,445.28	93.3400	44,056.48	11,611.20
184.0000	CONMED CORP	4,999.28	44.1500	8,123.60	3,124.32
512.0000	CONNECTICUT WATER SERVICE INC	14,783.82	33.8700	17,341.44	2,557.62
7,419.0000	CONOCOPHILLIPS	335,870.01	85.7300	636,030.87	300,160.86
1,378.0000	CONSOLIDATED EDISON INC	64,322.15	57.7400	79,565.72	15,243.57
1,149.0000	CONSTELLATION BRANDS INC	24,794.71	88.1300	101,261.37	76,466.66
257.0000	CONTINENTAL RESOURCES INC/OK	20,103.78	158.0400	40,616.28	20,512.50
1,136.0000	CONVERGYS CORP	14,972.48	21.4400	24,355.84	9,383.36
295.0000	CONVERSANT INC	4,808.50	25.4000	7,493.00	2,684.50
344.0000	COOPER COS INC/THE	20,708.80	135.5300	46,622.32	25,913.52
775.0000	COOPER TIRE & RUBBER CO	13,477.25	30.0000	23,250.00	9,772.75
220.0000	COPART INC	4,946.70	35.9600	7,911.20	2,964.50
3,185.0000	CORCEPT THERAPEUTICS INC	5,096.00	2.8000	8,918.00	3,822.00
387.0000	CORELOGIC INC	9,845.28	30.3600	11,749.32	1,904.04
774.0000	CORNERSTONE ONDEMAND INC	21,880.98	46.0200	35,619.48	13,738.50



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1,913.0000	CORNING INC	23,454.27	21.9500	41,990.35	18,536.08
218.0000	CORPORATE EXECUTIVE BOARD CO/T	8,942.36	68.2200	14,871.96	5,929.60
1,086.0000	CORPORATE OFFICE PROPERTIES TR	23,598.78	27.8100	30,201.66	6,602.88
1,008.0000	CORRECTIONS CORP OF AMERICA	19,968.48	32.8500	33,112.80	13,144.32
208.0000	CORVEL CORP	5,049.20	45.1800	9,397.44	4,348.24
2,491.0000	COSTCO WHOLESALE CORP	124,731.35	115.1600	286,863.56	162,132.21
160.0000	COSTAR GROUP INC	8,939.20	158.1700	25,307.20	16,368.00
465.0000	COURIER CORP	4,915.05	14.9200	6,937.80	2,022.75
221.0000	COVANCE INC	11,392.55	85.5800	18,913.18	7,520.63
763.0000	COVANTA HOLDING CORP	12,276.67	20.6100	15,725.43	3,448.76
564.0000	CRANE CO	20,332.20	74.3600	41,939.04	21,606.84
1,066.0000	CREE INC	28,008.93	49.9500	53,246.70	25,237.77
47.0000	CRIMSON WINE GROUP LTD	333.40	9.0500	425.35	91.95
1,481.0000	CROWN CASTLE INTERNATIONAL COR	57,415.44	74.2600	109,979.06	52,563.62
783.0000	CROWN HOLDINGS INC	28,362.84	49.7600	38,962.08	10,599.24
626.0000	CUBESMART	6,441.54	18.3200	11,468.32	5,026.78
684.0000	CUBIST PHARMACEUTICALS INC	26,357.22	69.8200	47,756.88	21,399.66



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397.0000	CUBIST PHARMACEUTIC CVR W I	853.55	0.1160	46.05	807.50-
719.0000	CUMMINS INC	49,648.74	154.2900	110,934.51	61,285.77
303.0000	CURTISS-WRIGHT CORP	9,886.74	65.5600	19,864.68	9,977.94
179.0000	CYBERONICS INC	5,804.97	62.4600	11,180.34	5,375.37
394.0000	CYTEC INDUSTRIES INC	20,276.08	105.4200	41,535.48	21,259.40
4,120.0000	DCT INDUSTRIAL TRUST INC	29,147.89	8.2100	33,825.20	4,677.31
1,366.0000	DDR CORP	18,468.32	17.6300	24,082.58	5,614.26
2,016.0000	DR HORTON INC	32,323.83	24.5800	49,553.28	17,229.45
222.0000	DST SYSTEMS INC	11,350.86	92.1700	20,461.74	9,110.88
1,553.0000	DTE ENERGY CO	64,899.41	77.8700	120,932.11	56,032.70
272.0000	DSW INC	6,732.00	27.9400	7,599.68	867.68
376.0000	DANA HOLDING CORP	4,872.96	24.4200	9,181.92	4,308.96
3,760.0000	DANAHER CORP	134,174.32	78.7300	296,024.80	161,850.48
192.0000	DARDEN RESTAURANTS INC	8,277.46	46.2700	8,883.84	606.38
298.0000	DARLING INGREDIENTS INC	4,928.92	20.9000	6,228.20	1,299.28
700.0000	DAVITA HEALTHCARE PARTNERS INC	39,449.17	72.3200	50,624.00	11,174.83
231.0000	DEALERTRACK TECHNOLOGY INC	4,931.85	45.3400	10,473.54	5,541.69



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577.0000	DEAN FOODS CO	6,567.12	17.5900	10,149.43	3,582.31
108.0000	DECKERS OUTDOOR CORP	5,114.88	86.3300	9,323.64	4,208.76
1,349.0000	DEERE & CO	57,179.26	90.5500	122,151.95	64,972.69
5,859.0000	DELTA AIR LINES INC	48,198.43	38.7200	226,860.48	178,662.05
324.0000	DELUXE CORP	7,626.96	58.5800	18,979.92	11,352.96
18,323.0000	DENDREON CORP	43,452.99	2.3000	42,142.90	1,310.09-
825.0000	DENTSPLY INTERNATIONAL INC	24,417.46	47.3500	39,063.75	14,646.29
393.0000	DEVON ENERGY CORP	22,573.64	79.4000	31,204.20	8,630.56
1,609.0000	DIAMONDROCK HOSPITALITY CO	15,734.80	12.8200	20,627.38	4,892.58
453.0000	DICK'S SPORTING GOODS INC	17,929.74	46.5600	21,091.68	3,161.94
599.0000	DIGITAL REALTY TRUST INC	29,069.47	58.3200	34,933.68	5,864.21
894.0000	DIGITALGLOBE INC	14,289.73	27.8000	24,853.20	10,563.47
353.0000	DIME COMMUNITY BANCSHARES INC	4,994.95	15.7900	5,573.87	578.92
146.0000	DILLARD'S INC	7,402.20	116.6100	17,025.06	9,622.86
289.0000	DINEEQUITY INC	15,272.21	79.4900	22,972.61	7,700.40
9,587.0000	WALT DISNEY CO/THE	294,568.71	85.7400	821,989.38	527,420.67
595.0000	DISCOVERY COMMUNICATIONS INC	22,373.90	74.2800	44,196.60	21,822.70



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1,576.0000	DISH NETWORK CORP	40,203.95	65.0800	102,566.08	62,362.13
3,333.0000	DISCOVER FINANCIAL SERVICES	80,232.42	61.9800	206,579.34	126,346.92
3,746.0000	DIRECTV	117,664.40	85.0100	318,447.46	200,783.06
185.0000	DOLBY LABORATORIES INC	6,114.25	43.2000	7,992.00	1,877.75
1,379.0000	DOLLAR GENERAL CORP	53,307.60	57.3600	79,099.44	25,791.84
1,666.0000	DOLLAR TREE INC	53,713.75	54.4600	90,730.36	37,016.61
3,781.0000	DOMINION RESOURCES INC/VA	146,080.26	71.5200	270,417.12	124,336.86
706.0000	DOMINO'S PIZZA INC	25,725.92	73.0900	51,601.54	25,875.62
620.0000	DOMTAR CORP	19,486.60	42.8500	26,567.00	7,080.40
174.0000	DONALDSON CO INC	5,054.70	42.3200	7,363.68	2,308.98
1,302.0000	DOUGLAS EMMETT INC	20,154.96	28.2200	36,742.44	16,587.48
1,560.0000	DOVER CORP	62,055.00	90.9500	141,882.00	79,827.00
3,601.0000	DOW CHEMICAL CO/THE	122,995.73	51.4600	185,307.46	62,311.73
1,709.0000	DR PEPPER SNAPPLE GROUP INC	41,930.83	58.5800	100,113.22	58,182.39
297.0000	DREAMWORKS ANIMATION SKG INC	5,075.73	23.2600	6,908.22	1,832.49
120.0000	DRESSER-RAND GROUP INC	6,026.40	63.7300	7,647.60	1,621.20
139.0000	DRIL-QUIP INC	10,027.39	109.2400	15,184.36	5,156.97



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6,069.0000	EI DU PONT DE NEMOURS & CO	265,221.94	65.4400	397,155.36	131,933.42
4,427.0000	DUKE ENERGY CORP NEW COM	236,470.50	74.1900	328,439.13	91,968.63
3,570.0000	DUKE REALTY CORP	41,840.40	18.1600	64,831.20	22,990.80
302.0000	DUN & BRADSTREET CORP	23,194.72	110.2000	33,280.40	10,085.68
849.0000	DUNKIN' BRANDS GROUP INC	27,473.64	45.8100	38,892.69	11,419.05
321.0000	DYCOM INDUSTRIES INC	4,798.95	31.3100	10,050.51	5,251.56
575.0000	DYNAMIC MATERIALS CORP	9,780.75	22.1300	12,724.75	2,944.00
6,961.0000	DYNEX CAPITAL INC	55,818.17	8.8500	61,604.85	5,786.68
9,406.0000	EMC CORP/MA	120,778.45	26.3400	247,754.04	126,975.59
3,492.0000	EOG RESOURCES INC	152,807.97	116.8600	408,075.12	255,267.15
1,022.0000	EQT CORP	41,356.70	106.9000	109,251.80	67,895.10
294.0000	EPR PPTYS COM SH BEN INT	13,518.12	55.8700	16,425.78	2,907.66
247.0000	ERA GROUP INC	4,607.57	28.6800	7,083.96	2,476.39
435.0000	EAGLE BANCORP INC	5,065.77	33.7500	14,681.25	9,615.48
3,452.0000	E*TRADE FINANCIAL CORP	30,791.84	21.2600	73,389.52	42,597.68
76.0000	EAGLE MATERIALS INC	5,126.20	94.2800	7,165.28	2,039.08
1,560.0000	EAST WEST BANCORP INC	28,969.20	34.9900	54,584.40	25,615.20



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264.0000	EASTMAN CHEMICAL CO	18,332.40	87.3500	23,060.40	4,728.00
6,508.0000	EBAY INC	192,863.68	50.0600	325,790.48	132,926.80
573.0000	ECHOSTAR CORP	11,542.68	52.9400	30,334.62	18,791.94
1,980.0000	ECOLAB INC	89,493.64	111.3400	220,453.20	130,959.56
3,262.0000	EDISON INTERNATIONAL	142,167.79	58.1100	189,554.82	47,387.03
597.0000	EDUCATION REALTY TRUST INC	4,955.10	10.7400	6,411.78	1,456.68
2,031.0000	ELECTRONIC ARTS INC	35,830.24	35.8700	72,851.97	37,021.73
421.0000	EMCOR GROUP INC	11,964.82	44.5300	18,747.13	6,782.31
4,716.0000	EMERSON ELECTRIC CO	198,564.12	66.3600	312,953.76	114,389.64
262.0000	EMPIRE DISTRICT ELECTRIC CO/TH	4,878.44	25.6800	6,728.16	1,849.72
315.0000	EMPLOYERS HOLDINGS INC	5,021.10	21.1800	6,671.70	1,650.60
220.0000	ENCORE WIRE CORP	5,108.40	49.0400	10,788.80	5,680.40
456.0000	ENERGEN CORP	23,562.06	88.8800	40,529.28	16,967.22
224.0000	ENERGIZER HOLDINGS INC	16,569.28	122.0300	27,334.72	10,765.44
569.0000	ENERSYS	15,124.02	68.7900	39,141.51	24,017.49
460.0000	ENLINK MIDSTREAM LLC	5,064.60	41.6600	19,163.60	14,099.00
390.0000	ENTERPRISE FINANCIAL SERVICES	5,190.90	18.0600	7,043.40	1,852.50



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775.0000	EQUIFAX INC	26,793.85	72.5400	56,218.50	29,424.65
156.0000	EQUITY LIFESTYLE PROPERTIES IN	4,885.92	44.1600	6,888.96	2,003.04
1,945.0000	EQUITY RESIDENTIAL	98,237.86	63.0000	122,535.00	24,297.14
464.0000	ERIE INDEMNITY CO	19,759.86	75.2600	34,920.64	15,160.78
345.0000	ESSEX PROPERTY TRUST INC	50,115.73	184.9100	63,793.95	13,678.22
73.0000	ESTERLINE TECHNOLOGIES CORP	5,042.11	115.1200	8,403.76	3,361.65
242.0000	ETHAN ALLEN INTERIORS INC	5,055.38	24.7400	5,987.08	931.70
323.0000	EURONET WORLDWIDE INC	4,857.92	48.2400	15,581.52	10,723.60
740.0000	EVERCORE PARTNERS INC	18,206.96	57.6400	42,653.60	24,446.64
1,502.0000	EXACT SCIENCES CORP	15,891.16	17.0300	25,579.06	9,687.90
834.0000	EXAR CORP	4,978.98	11.3000	9,424.20	4,445.22
823.0000	EXELON CORP	23,208.60	36.4800	30,023.04	6,814.44
1,344.0000	EXONE CO/THE	50,534.40	39.6200	53,249.28	2,714.88
229.0000	EXPEDIA INC	7,780.54	78.7600	18,036.04	10,255.50
5,217.0000	EXPRESS SCRIPTS HOLDING CO	199,532.85	69.3300	361,694.61	162,161.76
442.0000	EXTRA SPACE STORAGE INC	9,056.58	53.2500	23,536.50	14,479.92
24,899.0000	EXXON MOBIL CORP	1,635,570.91	100.6800	2,506,831.32	871,260.41



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244.0000	FEI CO	8,874.28	90.7300	22,138.12	13,263.84
978.0000	FLIR SYSTEMS INC	24,868.47	34.7300	33,965.94	9,097.47
1,689.0000	FMC TECHNOLOGIES INC	39,681.94	61.0700	103,147.23	63,465.29
478.0000	FMC CORP	27,184.10	71.1900	34,028.82	6,844.72
800.0000	FNB CORP/PA	8,088.00	12.8200	10,256.00	2,168.00
528.0000	FXCM INC	5,169.12	14.9600	7,898.88	2,729.76
9,937.0000	FACEBOOK INC	230,660.98	67.2900	668,660.73	437,999.75
251.0000	FAIR ISAAC CORP	7,276.49	63.7600	16,003.76	8,727.27
1,519.0000	FAIRCHILD SEMICONDUCTOR INTERN	16,359.63	15.6000	23,696.40	7,336.77
356.0000	FAMILY DOLLAR STORES INC	20,222.36	66.1400	23,545.84	3,323.48
123.0000	FARO TECHNOLOGIES INC	5,098.35	49.1200	6,041.76	943.41
674.0000	FASTENAL CO	18,731.60	49.4900	33,356.26	14,624.66
199.0000	FEDERAL REALTY INVESTMENT TRUS	15,211.56	120.9200	24,063.08	8,851.52
1,241.0000	FEDERAL SIGNAL CORP	5,174.97	14.6500	18,180.65	13,005.68
1,997.0000	FEDEX CORP	213,562.73	151.3800	302,305.86	88,743.13
4,736.0000	FELCOR LODGING TRUST INC	21,927.68	10.5100	49,775.36	27,847.68
514.0000	FEMALE HEALTH CO/THE	2,631.17	5.5100	2,832.14	200.97



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326.0000	F5 NETWORKS INC	20,260.90	111.4400	36,329.44	16,068.54
2,102.0000	FIDELITY NATIONAL INFORMATION	50,080.54	54.7400	115,063.48	64,982.94
1,579.0000	FIDELITY NATIONAL FINANCIAL IN	21,790.20	32.7600	51,728.04	29,937.84
411.0000	FIDUS INVESTMENT CORP	5,313.12	20.5400	8,441.94	3,128.82
4,749.0000	FIFTH THIRD BANCORP	67,886.43	21.3500	101,391.15	33,504.72
934.0000	FINANCIAL ENGINES INC	19,668.68	45.2800	42,291.52	22,622.84
311.0000	FINANCIAL INSTITUTIONS INC	5,010.21	23.4200	7,283.62	2,273.41
543.0000	FINISAR CORP	8,726.01	19.7500	10,724.25	1,998.24
2,510.0000	FIRST BANCORP/PUERTO RICO	9,638.40	5.4400	13,654.40	4,016.00
129.0000	FIRST CASH FINANCIAL SERVICES	5,020.68	57.5900	7,429.11	2,408.43
24.0000	FIRST CITIZENS BANCSHARES INC/	4,320.24	245.0000	5,880.00	1,559.76
1,067.0000	FIRST COMMONWEALTH FINANCIAL C	5,217.63	9.2200	9,837.74	4,620.11
366.0000	FIRST DEFIANCE FINANCIAL CORP	5,223.11	28.7000	10,504.20	5,281.09
396.0000	FIRST FINANCIAL BANKSHARES INC	6,617.16	31.3700	12,422.52	5,805.36
2,776.0000	FIRST HORIZON NATIONAL CORP	22,715.04	11.8600	32,923.36	10,208.32
887.0000	FIRST INDUSTRIAL REALTY TRUST	10,226.50	18.8400	16,711.08	6,484.58
465.0000	FIRST REPUBLIC BANK/CA	13,610.55	54.9900	25,570.35	11,959.80



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714.0000	FIRST SOLAR INC	11,345.46	71.0600	50,736.84	39,391.38
245.0000	1ST SOURCE CORP	4,922.05	30.6200	7,501.90	2,579.85
2,442.0000	FISERV INC	57,643.41	60.3200	147,301.44	89,658.03
691.0000	FIRSTMERIT CORP	10,019.50	19.7500	13,647.25	3,627.75
2,681.0000	FIVE STAR QUALITY CARE INC	7,404.12	5.0100	13,431.81	6,027.69
167.0000	FLEETCOR TECHNOLOGIES INC	5,018.35	131.8000	22,010.60	16,992.25
646.0000	FLOTEK INDUSTRIES INC	4,921.03	32.1600	20,775.36	15,854.33
1,267.0000	FLUOR CORP	50,272.93	76.9000	97,432.30	47,159.37
537.0000	FLOWERVE CORP	28,664.22	74.3500	39,925.95	11,261.73
832.0000	FOOT LOCKER INC	16,698.23	50.7200	42,199.04	25,500.81
24,016.0000	FORD MOTOR CO	227,282.27	17.2400	414,035.84	186,753.57
1,238.0000	FOREST CITY ENTERPRISES INC	18,322.40	19.8700	24,599.06	6,276.66
1,690.0000	FOREST LABORATORIES INC	63,372.07	99.0000	167,310.00	103,937.93
643.0000	FORESTAR GROUP INC	10,113.31	19.0900	12,274.87	2,161.56
564.0000	FORTINET INC	10,180.20	25.1300	14,173.32	3,993.12
1,423.0000	FORTUNE BRANDS HOME & SECURITY	28,053.03	39.9300	56,820.39	28,767.36
135.0000	FORWARD AIR CORP	5,111.10	47.8500	6,459.75	1,348.65



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353.0000	FOSSIL GROUP INC	30,856.08	104.5200	36,895.56	6,039.48
228.0000	FRANKLIN ELECTRIC CO INC	5,180.16	40.3300	9,195.24	4,015.08
2,748.0000	FRANKLIN RESOURCES INC	95,679.51	57.8400	158,944.32	63,264.81
2,432.0000	FREEPORT-MCMORAN COPPER & GOLD	75,720.32	36.5000	88,768.00	13,047.68
12,831.0000	FRONTIER COMMUNICATIONS CORP	59,494.54	5.8400	74,933.04	15,438.50
228.0000	HB FULLER CO	5,344.32	48.1000	10,966.80	5,622.48
2,352.0000	FULTON FINANCIAL CORP	24,225.60	12.3900	29,141.28	4,915.68
4,769.0000	FUSION-IO INC	41,967.20	11.3000	53,889.70	11,922.50
109.0000	GAMCO INVESTORS INCORPORATED CLASS A	4,884.29	83.0500	9,052.45	4,168.16
293.0000	GATX CORP	10,624.18	66.9400	19,613.42	8,989.24
240.0000	GNC HOLDINGS INC	4,636.70	34.1000	8,184.00	3,547.30
1,109.0000	GAIN CAPITAL HOLDINGS INC	4,935.05	7.8700	8,727.83	3,792.78
7,570.0000	GALENA BIOPHARMA COM	22,937.10	3.0600	23,164.20	227.10
696.0000	ARTHUR J GALLAGHER & CO	19,508.88	46.6000	32,433.60	12,924.72
379.0000	GAMING AND LEISURE PROPERTIES	11,689.01	33.9700	12,874.63	1,185.62
890.0000	GAMESTOP CORP	23,255.70	40.4700	36,018.30	12,762.60



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2,166.0000	GANNETT CO INC	28,916.10	31.3100	67,817.46	38,901.36
2,163.0000	GAP INC/THE	50,858.69	41.5700	89,915.91	39,057.22
867.0000	GARTNER INC	35,589.97	70.5200	61,140.84	25,550.87
1,910.0000	GENERAL DYNAMICS CORP	136,978.44	116.5500	222,610.50	85,632.06
44,963.0000	GENERAL ELECTRIC CO	1,072,555.71	26.2800	1,181,627.64	109,071.93
2,354.0000	GENERAL GROWTH PROPERTIES INC	29,580.32	23.5600	55,460.24	25,879.92
4,469.0000	GENERAL MILLS INC	127,235.56	52.5400	234,801.26	107,565.70
4,715.0000	GENERAL MOTORS CO	118,976.73	36.3000	171,154.50	52,177.77
150.0000	GENESCO INC	7,653.00	82.1300	12,319.50	4,666.50
89.0000	GENESEE & WYOMING INC	4,938.61	105.0000	9,345.00	4,406.39
1,473.0000	GENUINE PARTS CO	64,646.82	87.8000	129,329.40	64,682.58
2,713.0000	GENWORTH FINANCIAL INC	25,674.76	17.4000	47,206.20	21,531.44
457.0000	GIBRALTAR INDUSTRIES INC	4,958.45	15.5100	7,088.07	2,129.62
3,178.0000	GIGAMON INC	61,367.18	19.1400	60,826.92	540.26-
9,068.0000	GILEAD SCIENCES INC	227,687.52	82.9100	751,827.88	524,140.36
882.0000	GLACIER BANCORP INC	11,015.07	28.3800	25,031.16	14,016.09
42.0000	GLADSTONE INVESTMENT CORP	304.92	7.4000	310.80	5.88



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561.0000	GLOBAL PAYMENTS INC	25,144.02	72.8500	40,868.85	15,724.83
11,675.0000	GOLD RESOURCE CORP	54,838.64	5.0600	59,075.50	4,236.86
1,007.0000	GOLDMAN SACHS GROUP INC/THE	114,817.33	167.4400	168,612.08	53,794.75
346.0000	GOLUB CAPITAL BDC INC	5,241.90	17.7000	6,124.20	882.30
1,489.0000	GOODYEAR TIRE & RUBBER CO/THE	21,789.87	27.7800	41,364.42	19,574.55
1,448.0000	GOOGLE INC	311,652.78	584.6700	846,602.16	534,949.38
1,448.0000	GOOGLE INC	310,957.73	575.2800	833,005.44	522,047.71
416.0000	GORMAN-RUPP CO/THE	9,771.01	35.3700	14,713.92	4,942.91
648.0000	WR GRACE & CO	32,262.13	94.5300	61,255.44	28,993.31
625.0000	GRACO INC	20,168.75	78.0800	48,800.00	28,631.25
1,313.0000	GRAFTECH INTERNATIONAL LTD	9,703.07	10.4600	13,733.98	4,030.91
19.0000	GRAHAM HOLDINGS CO	7,277.38	718.1100	13,644.09	6,366.71
377.0000	GRAND CANYON EDUCATION INC	5,108.35	45.9700	17,330.69	12,222.34
244.0000	GRANITE CONSTRUCTION INC	5,963.36	35.9800	8,779.12	2,815.76
884.0000	GREAT LAKES DREDGE & DOCK CORP	5,091.84	7.9900	7,063.16	1,971.32
549.0000	GREAT SOUTHERN BANCORP INC	9,997.29	32.0500	17,595.45	7,598.16
932.0000	GREAT PLAINS ENERGY INC	18,136.72	26.8700	25,042.84	6,906.12



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649.0000	GREEN DOT CORP	8,229.32	18.9800	12,318.02	4,088.70
485.0000	GREEN PLAINS INC	4,951.85	32.8700	15,941.95	10,990.10
249.0000	GREENBRIER COS INC	4,932.69	57.6000	14,342.40	9,409.71
569.0000	GREENHILL & CO INC	21,929.04	49.2500	28,023.25	6,094.21
1,066.0000	GRIFFON CORP	10,247.88	12.4000	13,218.40	2,970.52
152.0000	GROUP 1 AUTOMOTIVE INC	5,973.60	84.3100	12,815.12	6,841.52
1,177.0000	GROUPON INC	5,202.34	6.6200	7,791.74	2,589.40
355.0000	GULF COAST ULTRA DEEP ROYALTY	621.25	2.9000	1,029.50	408.25
123.0000	GULFMARK OFFSHORE INC	5,034.39	45.1800	5,557.14	522.75
320.0000	GULFPORT ENERGY CORP	10,065.22	62.8000	20,096.00	10,030.78
379.0000	H&E EQUIPMENT SERVICES INC	4,839.83	36.3400	13,772.86	8,933.03
439.0000	HCA HOLDINGS INC	16,182.06	56.3800	24,750.82	8,568.76
528.0000	HCC INSURANCE HOLDINGS INC	15,137.76	48.9400	25,840.32	10,702.56
4,399.0000	HCP INC	150,952.27	41.3800	182,030.62	31,078.35
349.0000	HFF INC	4,788.28	37.1900	12,979.31	8,191.03
488.0000	HNI CORP	12,111.22	39.1100	19,085.68	6,974.46
163.0000	HSN INC	4,995.95	59.2400	9,656.12	4,660.17



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604.0000	HAEMONETICS CORP	18,038.46	35.2800	21,309.12	3,270.66
92.0000	HAIN CELESTIAL GROUP INC/THE	5,118.88	88.7400	8,164.08	3,045.20
5,945.0000	HALLIBURTON CO	179,932.29	71.0100	422,154.45	242,222.16
720.0000	HALLMARK FINANCIAL SERVICES	4,989.60	10.7500	7,740.00	2,750.40
161.0000	HANCOCK HOLDING CO	4,965.24	35.3200	5,686.52	721.28
994.0000	HANESBRANDS INC	31,517.60	98.4400	97,849.36	66,331.76
142.0000	HANOVER INSURANCE GROUP INC/TH	6,178.42	63.1500	8,967.30	2,788.88
1,241.0000	HARLEY-DAVIDSON INC	62,343.69	69.8500	86,683.85	24,340.16
343.0000	HARMAN INTERNATIONAL INDUSTRIE	15,012.35	107.4300	36,848.49	21,836.14
1,141.0000	HARRIS CORP	44,322.60	75.7500	86,430.75	42,108.15
2,263.0000	HARTFORD FINANCIAL SERVICES GR	55,768.39	35.8100	81,038.03	25,269.64
637.0000	HASBRO INC	16,282.40	53.0500	33,792.85	17,510.45
4,221.0000	HATTERAS FINANCIAL CORP	71,292.69	19.8100	83,618.01	12,325.32
879.0000	HAWAIIAN HOLDINGS INC	5,054.25	13.7100	12,051.09	6,996.84
205.0000	HEALTHSOUTH CORP	4,987.65	35.8700	7,353.35	2,365.70
174.0000	HEALTHCARE REALTY TRUST INC	3,563.52	25.4200	4,423.08	859.56
2,852.0000	HEALTH CARE REIT INC	121,776.29	62.6700	178,734.84	56,958.55



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565.0000	HEALTH NET INC	15,040.30	41.5400	23,470.10	8,429.80
255.0000	HEARTLAND PAYMENT SYSTEMS INC	5,212.20	41.2100	10,508.55	5,296.35
8,374.0000	HECLA MINING CO	24,200.86	3.4500	28,890.30	4,689.44
410.0000	HEICO CORP	13,972.80	51.9400	21,295.40	7,322.60
978.0000	HELIX ENERGY SOLUTIONS GROUP I	15,919.84	26.3100	25,731.18	9,811.34
601.0000	HELMERICH & PAYNE INC	24,354.02	116.1100	69,782.11	45,428.09
544.0000	JACK HENRY & ASSOCIATES INC	15,939.20	59.4300	32,329.92	16,390.72
985.0000	HERITAGE COMMERCE CORP	4,869.25	8.1700	8,047.45	3,178.20
492.0000	HERCULES TECHNOLOGY GROWTH CAP	5,072.52	16.1600	7,950.72	2,878.20
385.0000	HERITAGE FINANCIAL CORP/WA	4,966.50	16.0900	6,194.65	1,228.15
932.0000	HERSHEY CO/THE	49,928.96	97.3700	90,748.84	40,819.88
2,148.0000	HERTZ GLOBAL HOLDINGS INC	32,754.98	28.0300	60,208.44	27,453.46
1,710.0000	HESS CORP	77,780.48	98.8900	169,101.90	91,321.42
5,139.0000	HEWLETT-PACKARD CO	108,999.40	33.6800	173,081.52	64,082.12
425.0000	HEXCEL CORP	10,060.43	40.9000	17,382.50	7,322.07
130.0000	HIBBETT SPORTS INC	5,092.10	54.1700	7,042.10	1,950.00
151.0000	HIGHWOODS PROPERTIES INC	4,898.44	41.9500	6,334.45	1,436.01



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627.0000	HILL-ROM HOLDINGS INC	17,336.55	41.5100	26,026.77	8,690.22
215.0000	HILLENBRAND INC	4,882.65	32.6200	7,013.30	2,130.65
570.0000	HILLTOP HOLDINGS INC	4,930.50	21.2600	12,118.20	7,187.70
1,911.0000	HOLOGIC INC	35,479.86	25.3500	48,443.85	12,963.99
418.0000	HOME BANCSHARES INC/AR	4,932.40	32.8200	13,718.76	8,786.36
8,084.0000	HOME DEPOT INC/THE	295,717.57	80.9600	654,480.64	358,763.07
195.0000	HOMEAWAY INC	4,898.40	34.8200	6,789.90	1,891.50
4,841.0000	HONEYWELL INTERNATIONAL INC	200,555.37	92.9500	449,970.95	249,415.58
1,484.0000	HORMEL FOODS CORP	33,285.11	49.3500	73,235.40	39,950.29
2,192.0000	HORIZON PHARMA INC	5,282.72	15.8200	34,677.44	29,394.72
192.0000	HORNBECK OFFSHORE SERVICES INC	4,809.60	46.9200	9,008.64	4,199.04
830.0000	HORSEHEAD HOLDING CORP	9,951.70	18.2600	15,155.80	5,204.10
2,202.0000	HOSPITALITY PROPERTIES TRUST	48,928.44	30.4000	66,940.80	18,012.36
4,338.0000	HOST HOTELS & RESORTS INC	62,120.16	22.0100	95,479.38	33,359.22
185.0000	HOWARD HUGHES CORP/THE	15,117.50	157.8300	29,198.55	14,081.05
158.0000	HUBBELL INC	14,844.93	123.1500	19,457.70	4,612.77
6,129.0000	HUDSON CITY BANCORP INC	36,406.26	9.8300	60,248.07	23,841.81



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1,170.0000	HUMANA INC	74,670.22	127.7200	149,432.40	74,762.18
450.0000	JB HUNT TRANSPORT SERVICES INC	20,574.00	73.7800	33,201.00	12,627.00
7,642.0000	HUNTINGTON BANCSHARES INC/OH	40,273.34	9.5400	72,904.68	32,631.34
344.0000	HUNTINGTON INGALLS INDUSTRIES	12,961.36	94.5900	32,538.96	19,577.60
2,133.0000	HUNTSMAN CORP	26,136.75	28.1000	59,937.30	33,800.55
165.0000	HURON CONSULTING GROUP INC	4,851.00	70.8200	11,685.30	6,834.30
514.0000	HYATT HOTELS CORP	19,943.20	60.9800	31,343.72	11,400.52
303.0000	IAC/INTERACTIVECORP	11,608.50	69.2300	20,976.69	9,368.19
198.0000	ICF INTERNATIONAL INC	4,950.00	35.3600	7,001.28	2,051.28
2,031.0000	ISTAR FINANCIAL INC	12,348.48	14.9800	30,424.38	18,075.90
788.0000	ITT CORP	15,320.78	48.1000	37,902.80	22,582.02
315.0000	IDACORP INC	15,032.32	57.8300	18,216.45	3,184.13
287.0000	IDEX CORP	14,860.69	80.7400	23,172.38	8,311.69
362.0000	IDEXX LABORATORIES INC	27,066.74	133.5700	48,352.34	21,285.60
321.0000	IGATE CORP	5,001.18	36.3900	11,681.19	6,680.01
445.0000	IHS INC	41,102.72	135.6700	60,373.15	19,270.43
2,798.0000	ILLINOIS TOOL WORKS INC	126,121.80	87.5600	244,992.88	118,871.08



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412.0000	IMPAX LABORATORIES INC	8,330.64	29.9900	12,355.88	4,025.24
2,346.0000	INCONTACT INC	11,753.46	9.1900	21,559.74	9,806.28
1,211.0000	INCYTE CORP LTD	19,460.77	56.4400	68,348.84	48,888.07
190.0000	INDEPENDENT BANK CORP/ROCKLAND	4,932.40	38.3800	7,292.20	2,359.80
95.0000	INFINITY PROPERTY & CASUALTY C	5,136.65	67.2300	6,386.85	1,250.20
1,422.0000	INFOBLOX INC	18,741.96	13.1500	18,699.30	42.66-
337.0000	INGLES MARKETS INC	5,048.26	26.3500	8,879.95	3,831.69
1,393.0000	INGRAM MICRO INC	25,185.44	29.2100	40,689.53	15,504.09
412.0000	INGREDION INC	20,064.33	75.0400	30,916.48	10,852.15
305.0000	INSIGHT ENTERPRISES INC	5,072.15	30.7400	9,375.70	4,303.55
156.0000	INNOSPEC INC	4,873.11	43.1700	6,734.52	1,861.41
245.0000	INSULET CORP	5,049.45	39.6700	9,719.15	4,669.70
2,593.0000	INTEGRATED DEVICE TECHNOLOGY I	16,024.74	15.4600	40,087.78	24,063.04
28,133.0000	INTEL CORP	586,714.59	30.9000	869,309.70	282,595.11
304.0000	INTEGRYS ENERGY GROUP INC	14,874.72	71.1300	21,623.52	6,748.80
1,135.0000	INTERACTIVE BROKERS GROUP INC	18,637.04	23.2900	26,434.15	7,797.11
213.0000	INTERACTIVE INTELLIGENCE GROUP INC	5,188.68	56.1300	11,955.69	6,767.01



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355.0000	INTERCONTINENTAL EXCHANGE INC	54,793.96	188.9000	67,059.50	12,265.54
1,182.0000	INTERNATIONAL BANCSHARES CORP	19,053.84	27.0000	31,914.00	12,860.16
5,493.0000	INTERNATIONAL BUSINESS MACHINE	451,334.00	181.2700	995,716.11	544,382.11
910.0000	INTERNATIONAL FLAVORS & FRAGRA	36,099.79	104.2800	94,894.80	58,795.01
2,693.0000	INTERNATIONAL PAPER CO	94,491.99	50.4700	135,915.71	41,423.72
186.0000	INTERNATIONAL SPEEDWAY CORP	4,992.24	33.2800	6,190.08	1,197.84
1,148.0000	INTERSIL CORP	9,631.72	14.9500	17,162.60	7,530.88
3,696.0000	INTERPUBLIC GROUP OF COS INC/T	36,512.41	19.5100	72,108.96	35,596.55
377.0000	INTERVAL LEISURE GROUP INC	5,051.80	21.9400	8,271.38	3,219.58
256.0000	INTUITIVE SURGICAL INC	70,720.53	411.8000	105,420.80	34,700.27
2,235.0000	INTUIT INC	72,897.66	80.5300	179,984.55	107,086.89
927.0000	INVENSENSE INC	9,909.63	22.6900	21,033.63	11,124.00
4,358.0000	INVESCO MORTGAGE CAPITAL INC	64,149.76	17.3600	75,654.88	11,505.12
925.0000	INVESTORS BANCORP INC NEW COM	5,045.78	11.0500	10,221.25	5,175.47
6,678.0000	IRIDIUM COMMUNICATIONS INC	55,360.62	8.4600	56,495.88	1,135.26
1,446.0000	IRON MOUNTAIN INC	35,839.11	35.4500	51,260.70	15,421.59
729.0000	ITC HOLDINGS CORP	20,168.61	36.4800	26,593.92	6,425.31



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23,030.0000	JPMORGAN CHASE & CO	944,054.42	57.6200	1,326,988.60	382,934.18
225.0000	JACK IN THE BOX INC	5,033.25	59.8400	13,464.00	8,430.75
799.0000	JACOBS ENGINEERING GROUP INC	32,671.11	53.2800	42,570.72	9,899.61
2,438.0000	JANUS CAPITAL GROUP INC	18,187.48	12.4800	30,426.24	12,238.76
1,138.0000	JARDEN CORP	26,879.79	59.3500	67,540.30	40,660.51
1,467.0000	JAVELIN MORTGAGE INVESTMENT CO	19,584.45	14.1000	20,684.70	1,100.25
813.0000	JETBLUE AIRWAYS CORP	5,162.55	10.8500	8,821.05	3,658.50
15,367.0000	JOHNSON & JOHNSON	999,148.20	104.6200	1,607,695.54	608,547.34
4,333.0000	JOHNSON CONTROLS INC	104,970.66	49.9300	216,346.69	111,376.03
376.0000	JONES LANG LASALLE INC	26,928.52	126.3900	47,522.64	20,594.12
180.0000	J2 GLOBAL INC	4,905.00	50.8600	9,154.80	4,249.80
5,601.0000	JUNIPER NETWORKS INC	106,611.74	24.5400	137,448.54	30,836.80
379.0000	KAR AUCTION SERVICES INC	5,040.70	31.8700	12,078.73	7,038.03
903.0000	KBR INC	20,489.07	23.8500	21,536.55	1,047.48
1,168.0000	KLA-TENCOR CORP	54,278.65	72.6400	84,843.52	30,564.87
380.0000	KANSAS CITY SOUTHERN	20,218.40	107.5100	40,853.80	20,635.40
646.0000	KAPSTONE PAPER AND PACKAGING C	5,332.73	33.1300	21,401.98	16,069.25



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530.0000	KATE SPADE & CO	9,778.50	38.1400	20,214.20	10,435.70
1,596.0000	KB HOME	12,943.56	18.6800	29,813.28	16,869.72
1,673.0000	KELLOGG CO	83,414.11	65.7000	109,916.10	26,501.99
320.0000	KELLY SERVICES INC	5,027.20	17.1700	5,494.40	467.20
2,337.0000	KEMET CORP	9,651.81	5.7500	13,437.75	3,785.94
314.0000	KEMPER CORPORATION	9,143.68	36.8600	11,574.04	2,430.36
516.0000	KENNAMETAL INC	20,593.56	46.2800	23,880.48	3,286.92
650.0000	KEURIG GREEN MOUNTAIN INC	18,439.89	124.6100	80,996.50	62,556.61
1,603.0000	KEY ENERGY SERVICES INC	9,714.18	9.1400	14,651.42	4,937.24
6,436.0000	KEYCORP	51,101.84	14.3300	92,227.88	41,126.04
667.0000	KEYW HOLDING CORP/THE	4,970.82	12.5700	8,384.19	3,413.37
426.0000	KFORCE INC	5,197.20	21.6500	9,222.90	4,025.70
369.0000	KILROY REALTY CORP	14,040.45	62.2800	22,981.32	8,940.87
1,900.0000	KIMBERLY-CLARK CORP	124,200.91	111.2200	211,318.00	87,117.09
2,883.0000	KIMCO REALTY CORP	51,500.67	22.9800	66,251.34	14,750.67
1,647.0000	KINDER MORGAN INC/DELAWARE	48,925.80	36.2600	59,720.22	10,794.42
525.0000	KIRBY CORP	20,007.75	117.1400	61,498.50	41,490.75



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1,071.0000	KITE REALTY GROUP TRUST	4,905.18	6.1400	6,575.94	1,670.76
306.0000	KNIGHT TRANSPORTATION INC	4,938.84	23.7700	7,273.62	2,334.78
780.0000	KNOWLES CORP	12,222.83	30.7400	23,977.20	11,754.37
2,274.0000	KODIAK OIL & GAS CORP	15,944.24	14.5500	33,086.70	17,142.46
432.0000	KOHL'S CORP	19,829.32	52.6800	22,757.76	2,928.44
3,435.0000	KRAFT FOODS GROUP INC	103,389.63	59.9500	205,928.25	102,538.62
846.0000	KRATOS DEFENSE & SECURITY SOLU	5,076.00	7.8000	6,598.80	1,522.80
3,956.0000	KROGER CO/THE	90,643.20	49.4300	195,545.08	104,901.88
1,885.0000	L BRANDS INC	51,159.09	58.6600	110,574.10	59,415.01
390.0000	LHC GROUP INC	5,093.40	21.3700	8,334.30	3,240.90
1,271.0000	LKQ CORP	27,050.07	26.6900	33,922.99	6,872.92
622.0000	LPL FINANCIAL HOLDINGS INC	20,223.92	49.7400	30,938.28	10,714.36
514.0000	LA-Z-BOY INC	4,821.32	23.1700	11,909.38	7,088.06
831.0000	LABORATORY CORP OF AMERICA HOL	55,604.11	102.4000	85,094.40	29,490.29
125.0000	LACLEDE GROUP INC/THE	4,991.25	48.5500	6,068.75	1,077.50
231.0000	LAKELAND FINANCIAL CORP	5,109.72	38.1600	8,814.96	3,705.24
1,138.0000	LAM RESEARCH CORP	27,918.93	67.5800	76,906.04	48,987.11



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766.0000	LAMAR ADVERTISING CO	18,621.46	53.0000	40,598.00	21,976.54
68.0000	LANCASTER COLONY CORP	4,930.68	95.1600	6,470.88	1,540.20
110.0000	LANDSTAR SYSTEM INC	4,950.00	64.0000	7,040.00	2,090.00
1,062.0000	LAS VEGAS SANDS CORP	43,843.54	76.2200	80,945.64	37,102.10
752.0000	LASALLE HOTEL PROPERTIES	18,700.40	35.2900	26,538.08	7,837.68
88.0000	ESTEE LAUDER COS INC/THE	1,776.95	74.2600	6,534.88	4,757.93
1,384.0000	LEAP WIRELESS INTL CONTRA	0.00	0.0000	0.00	0.00
803.0000	LEAR CORP	38,882.32	89.3200	71,723.96	32,841.64
567.0000	LEGGETT & PLATT INC	12,978.63	34.2800	19,436.76	6,458.13
940.0000	LEGG MASON INC	29,384.40	51.3100	48,231.40	18,847.00
206.0000	LEIDOS HLDGS INC	6,752.59	38.3400	7,898.04	1,145.45
1,012.0000	LENNAR CORP	19,885.80	41.9800	42,483.76	22,597.96
38.0000	LENNOX INTERNATIONAL INC	2,405.40	89.5700	3,403.66	998.26
1,278.0000	LEUCADIA NATIONAL CORP	21,514.86	26.2200	33,509.16	11,994.30
810.0000	LEVEL 3 COMMUNICATIONS INC	17,607.66	43.9100	35,567.10	17,959.44
498.0000	LEXMARK INTERNATIONAL INC	13,680.06	48.1600	23,983.68	10,303.62
4,166.0000	LIBERTY INTERACTIVE CORP	57,324.44	29.3600	122,313.76	64,989.32



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416.0000	LIBERTY VENTURES	7,695.72	73.8000	30,700.80	23,005.08
778.0000	LIBERTY PROPERTY TRUST	24,118.00	37.9300	29,509.54	5,391.54
266.0000	LIFE TIME FITNESS INC	10,070.76	48.7400	12,964.84	2,894.08
326.0000	LIFEPOINT HOSPITALS INC	12,249.18	62.1000	20,244.60	7,995.42
1,557.0000	ELI LILLY & CO	78,317.14	62.1700	96,798.69	18,481.55
278.0000	LINCOLN ELECTRIC HOLDINGS INC	9,980.20	69.8800	19,426.64	9,446.44
1,312.0000	LINCOLN NATIONAL CORP	39,367.52	51.4400	67,489.28	28,121.76
1,568.0000	LINEAR TECHNOLOGY CORP	50,489.91	47.0700	73,805.76	23,315.85
477.0000	LINKEDIN CORP	51,486.85	171.4700	81,791.19	30,304.34
279.0000	LITHIA MOTORS INC	5,354.01	94.0700	26,245.53	20,891.52
75.0000	LITTELFUSE INC	4,898.25	92.9500	6,971.25	2,073.00
1,382.0000	LOCKHEED MARTIN CORP	119,245.24	160.7300	222,128.86	102,883.62
2,134.0000	LOEWS CORP	80,953.07	44.0100	93,917.34	12,964.27
2,712.0000	LORILLARD INC	64,096.76	60.9700	165,350.64	101,253.88
7,144.0000	LOWE'S COS INC	204,697.75	47.9900	342,840.56	138,142.81
626.0000	M&T BANK CORP	45,710.52	124.0500	77,655.30	31,944.78
344.0000	MB FINANCIAL INC	6,536.00	27.0500	9,305.20	2,769.20



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968.0000	MDU RESOURCES GROUP INC	20,031.06	35.1000	33,976.80	13,945.74
172.0000	MGE ENERGY INC	5,077.44	39.5100	6,795.72	1,718.28
3,013.0000	MGM RESORTS INTERNATIONAL	30,503.52	26.4000	79,543.20	49,039.68
203.0000	MKS INSTRUMENTS INC	5,093.27	31.2400	6,341.72	1,248.45
138.0000	MSA SAFETY INC	4,854.84	57.4800	7,932.24	3,077.40
76.0000	MSC INDUSTRIAL DIRECT CO	4,953.68	95.6400	7,268.64	2,314.96
840.0000	MSCI INC	30,204.52	45.8500	38,514.00	8,309.48
171.0000	MTS SYSTEMS CORP	9,876.96	67.7600	11,586.96	1,710.00
1,188.0000	MACERICH CO/THE	50,432.16	66.7500	79,299.00	28,866.84
2,238.0000	MACY'S INC	79,326.29	58.0200	129,848.76	50,522.47
714.0000	STEVEN MADDEN LTD	18,714.14	34.3000	24,490.20	5,776.06
93.0000	MAGELLAN HEALTH INC	4,841.58	62.2400	5,788.32	946.74
2,587.0000	MAGNUM HUNTER RESOURCES CORP	10,244.52	8.2000	21,213.40	10,968.88
259.0000	MAGNUM HUNTER RES CORP DEL WT EXP 04/15/2016	0.00	0.0000	0.00	0.00
104.0000	MAIN STREET CAPITAL CORP	1,919.84	32.9300	3,424.72	1,504.88
649.0000	MAINSOURCE FINANCIAL GROUP INC	5,750.14	17.2500	11,195.25	5,445.11



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1,451.0000	MANITOWOC CO INC/THE	15,582.43	32.8600	47,679.86	32,097.43
412.0000	MANPOWERGROUP INC	15,714.52	84.8500	34,958.20	19,243.68
4,483.0000	MARATHON OIL CORP	104,095.62	39.9200	178,961.36	74,865.74
743.0000	MARATHON PETROLEUM CORP	22,216.77	78.0700	58,006.01	35,789.24
513.0000	MARCUS CORP	4,945.32	18.2500	9,362.25	4,416.93
53.0000	MARKEL CORP	19,967.59	655.6400	34,748.92	14,781.33
208.0000	MARKETAXESS HOLDINGS INC	5,002.40	54.0600	11,244.48	6,242.08
3,608.0000	MARSH & MCLENNAN COS INC	107,513.60	51.8200	186,966.56	79,452.96
1,817.0000	MARRIOTT INTERNATIONAL INC/DE	64,337.83	64.1000	116,469.70	52,131.87
744.0000	MARTEN TRANSPORT LTD	9,869.66	22.3500	16,628.40	6,758.74
69.0000	MARTIN MARIETTA MATERIALS INC	5,063.22	132.0500	9,111.45	4,048.23
2,938.0000	MASCO CORP	47,648.92	22.2000	65,223.60	17,574.68
356.0000	MASTEC INC	6,497.00	30.8200	10,971.92	4,474.92
5,883.0000	MASTERCARD INC	170,523.05	73.4700	432,224.01	261,700.96
500.0000	MATSON INC	8,942.86	26.8400	13,420.00	4,477.14
2,505.0000	MATTEL INC	46,739.54	38.9700	97,619.85	50,880.31
153.0000	MATTHEWS INTERNATIONAL CORP	4,915.89	41.5700	6,360.21	1,444.32



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2,078.0000	MAXIM INTEGRATED PRODUCTS INC	49,373.28	33.8100	70,257.18	20,883.90
556.0000	MCCORMICK & CO INC/MD	25,938.36	71.5900	39,804.04	13,865.68
4,692.0000	MCDONALD'S CORP	186,509.82	100.7400	472,672.08	286,162.26
168.0000	MCGRATH RENTCORP	4,999.68	36.7500	6,174.00	1,174.32
794.0000	MCGRAW HILL FINANCIAL INC	38,793.54	83.0300	65,925.82	27,132.28
1,684.0000	MCKESSON CORP	90,057.62	186.2100	313,577.64	223,520.02
1,286.0000	MEAD JOHNSON NUTRITION CO	54,407.24	93.1700	119,816.62	65,409.38
1,508.0000	MEADWESTVACO CORP	35,213.87	44.2600	66,744.08	31,530.21
526.0000	MEDALLION FINANCIAL CORP	5,207.40	12.4600	6,553.96	1,346.56
295.0000	MEDICINES CO/THE	4,838.00	29.0600	8,572.70	3,734.70
514.0000	MEDNAX INC	19,905.31	58.1500	29,889.10	9,983.79
4,558.0000	MEDTRONIC INC	213,349.25	63.7600	290,618.08	77,268.83
324.0000	MEN'S WEARHOUSE INC/THE	10,533.24	55.8000	18,079.20	7,545.96
1,011.0000	MENTOR GRAPHICS CORP	12,656.01	21.5700	21,807.27	9,151.26
19,612.0000	MERCK & CO INC	820,515.47	57.8500	1,134,554.20	314,038.73
128.0000	MERCURY GENERAL CORP	4,974.08	47.0400	6,021.12	1,047.04
160.0000	MEREDITH CORP	4,865.60	48.3600	7,737.60	2,872.00



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402.0000	MERIDIAN INTERSTATE BANCORP IN	5,121.48	25.6800	10,323.36	5,201.88
221.0000	MERITAGE HOMES CORP	5,049.85	42.2100	9,328.41	4,278.56
1,315.0000	MERITOR INC	6,588.15	13.0400	17,147.60	10,559.45
94.0000	MESA LABORATORIES INC	5,018.66	83.9600	7,892.24	2,873.58
3,245.0000	METLIFE INC	120,020.15	55.5600	180,292.20	60,272.05
124.0000	METTLER-TOLEDO INTERNATIONAL I	19,685.56	253.1800	31,394.32	11,708.76
510.0000	MICROS SYSTEMS INC	24,301.50	67.9000	34,629.00	10,327.50
43,036.0000	MICROSOFT CORP	1,177,244.47	41.7000	1,794,601.20	617,356.73
793.0000	MICROCHIP TECHNOLOGY INC	28,440.95	48.8100	38,706.33	10,265.38
5,312.0000	MICRON TECHNOLOGY INC	44,116.54	32.9500	175,030.40	130,913.86
827.0000	MICROSEMI CORP	15,828.23	26.7600	22,130.52	6,302.29
189.0000	MID-AMERICA APARTMENT COMMUNIT	10,400.25	73.0500	13,806.45	3,406.20
351.0000	MIDDLEBY CORP	10,661.04	82.7200	29,034.72	18,373.68
676.0000	MILLER ENERGY RESOURCES INC	2,183.48	6.4000	4,326.40	2,142.92
358.0000	MOHAWK INDUSTRIES INC	20,413.16	138.3400	49,525.72	29,112.56
758.0000	MOLSON COORS BREWING CO	32,706.34	74.1600	56,213.28	23,506.94
10,788.0000	MONDELEZ INTERNATIONAL INC	205,927.40	37.6100	405,736.68	199,809.28



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345.0000	MONOLITHIC POWER SYSTEMS INC	5,226.75	42.3500	14,610.75	9,384.00
366.0000	MONOTYPE IMAGING HOLDINGS INC	5,025.18	28.1700	10,310.22	5,285.04
148.0000	MONRO MUFFLER BRAKE INC	5,046.80	53.1900	7,872.12	2,825.32
3,073.0000	MONSANTO CO	147,297.31	124.7400	383,326.02	236,028.71
478.0000	MONSTER BEVERAGE CORP	18,656.34	71.0300	33,952.34	15,296.00
2,126.0000	MONSTER WORLDWIDE INC	9,992.20	6.5400	13,904.04	3,911.84
1,388.0000	MOODY'S CORP	53,181.58	87.6600	121,672.08	68,490.50
221.0000	MOOG INC	9,483.64	72.8900	16,108.69	6,625.05
9,977.0000	MORGAN STANLEY	211,601.19	32.3300	322,556.41	110,955.22
83.0000	MORNINGSTAR INC	4,849.69	71.8100	5,960.23	1,110.54
390.0000	MOTOROLA SOLUTIONS INC	19,546.70	66.5700	25,962.30	6,415.60
294.0000	MOVADO GROUP INC	4,933.32	41.6700	12,250.98	7,317.66
476.0000	MUELLER INDUSTRIES INC	8,653.68	29.4100	13,999.16	5,345.48
1,401.0000	MURPHY OIL CORP	59,478.39	66.4800	93,138.48	33,660.09
350.0000	MURPHY USA INC	9,641.63	48.8900	17,111.50	7,469.87
3,183.0000	MYLAN INC/PA	66,244.46	51.5600	164,115.48	97,871.02
542.0000	MYRIAD GENETICS INC	11,051.38	38.9200	21,094.64	10,043.26



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449.0000	NCI BUILDING SYSTEMS INC	4,992.88	19.4300	8,724.07	3,731.19
1,002.0000	NCR CORP	17,446.56	35.0900	35,160.18	17,713.62
544.0000	NIC INC	6,832.64	15.8500	8,622.40	1,789.76
100.0000	NN INC	614.00	25.5800	2,558.00	1,944.00
1,294.0000	NPS PHARMACEUTICALS INC	11,516.60	33.0500	42,766.70	31,250.10
3,404.0000	NRG ENERGY INC	93,300.61	37.2000	126,628.80	33,328.19
1,277.0000	NRG YIELD INC	66,020.90	52.0500	66,467.85	446.95
11.0000	NVR INC	7,904.41	1,150.6000	12,656.60	4,752.19
738.0000	NASDAQ OMX GROUP INC/THE	22,396.95	38.6200	28,501.56	6,104.61
329.0000	NATIONAL FUEL GAS CO	19,679.54	78.3000	25,760.70	6,081.16
332.0000	NATIONAL HEALTH INVESTORS INC	16,244.76	62.5600	20,769.92	4,525.16
1,690.0000	NATIONAL OILWELL VARCO INC	73,663.79	82.3500	139,171.50	65,507.71
779.0000	NATIONAL PENN BANCSHARES INC	5,951.56	10.5800	8,241.82	2,290.26
535.0000	NATIONAL RETAIL PROPERTIES INC	12,995.15	37.1900	19,896.65	6,901.50
254.0000	NATIONSTAR MORTGAGE HOLDINGS I	4,937.76	36.3000	9,220.20	4,282.44
108.0000	NAVIGATORS GROUP INC/THE	4,966.92	67.0500	7,241.40	2,274.48
607.0000	NATUS MEDICAL INC	5,032.03	25.1400	15,259.98	10,227.95



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564.0000	NAVISTAR INTERNATIONAL CORP	14,678.28	37.4800	21,138.72	6,460.44
507.0000	NAVIGANT CONSULTING INC	5,070.00	17.4500	8,847.15	3,777.15
2,501.0000	NAVIENT CORP W/D	26,744.53	17.7100	44,292.71	17,548.18
233.0000	NELNET INC	5,039.79	41.4300	9,653.19	4,613.40
328.0000	NETFLIX INC	29,739.76	440.6000	144,516.80	114,777.04
305.0000	NETSCOUT SYSTEMS INC	5,407.65	44.3400	13,523.70	8,116.05
420.0000	NETSUITE INC	23,888.14	86.8800	36,489.60	12,601.46
2,764.0000	NEW YORK COMMUNITY BANCORP INC	33,278.56	15.9800	44,168.72	10,890.16
5,679.0000	NEW YORK MORTGAGE TRUST INC	42,867.97	7.8100	44,352.99	1,485.02
1,539.0000	NEW YORK TIMES CO/THE	12,161.41	15.2100	23,408.19	11,246.78
1,238.0000	NEWELL RUBBERMAID INC	19,399.46	30.9900	38,365.62	18,966.16
552.0000	NEWFIELD EXPLORATION CO	12,420.00	44.2000	24,398.40	11,978.40
564.0000	NEWPARK RESOURCES INC	4,980.12	12.4600	7,027.44	2,047.32
3,343.0000	NEWS CORP	30,581.98	17.9400	59,973.42	29,391.44
496.0000	NEWSTAR FINANCIAL INC	4,786.40	14.0600	6,973.76	2,187.36
2,540.0000	NEXTERA ENERGY INC	115,249.25	102.4800	260,299.20	145,049.95
3,471.0000	NIKE INC	105,580.19	77.5500	269,176.05	163,595.86



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1,904.0000	NISOURCE INC	41,260.63	39.3400	74,903.36	33,642.73
2,530.0000	NOBLE ENERGY INC	90,768.51	77.4600	195,973.80	105,205.29
1,077.0000	NORDSTROM INC	48,382.85	67.9300	73,160.61	24,777.76
2,417.0000	NORFOLK SOUTHERN CORP	104,380.57	103.0300	249,023.51	144,642.94
923.0000	NORTHEAST UTILITIES	23,598.46	47.2700	43,630.21	20,031.75
276.0000	NORTHERN TRUST CORP	14,959.56	64.2100	17,721.96	2,762.40
89.0000	NORTHFIELD BANCORP INC/NJ	895.14	13.1100	1,166.79	271.65
1,106.0000	NORTHROP GRUMMAN CORP	68,473.34	119.6300	132,310.78	63,837.44
5,442.0000	NORTHSTAR REALTY FINANCE CORP	63,623.64	17.3800	94,581.96	30,958.32
1,519.0000	NORTHSTAR REALTY FINANCE-W/I	53,638.35	16.8000	25,519.20	28,119.15-
301.0000	NORTHWEST BANCSHARES INC	3,657.15	13.5700	4,084.57	427.42
199.0000	NORTHWEST PIPE CO	4,736.20	40.3300	8,025.67	3,289.47
187.0000	NOVARTIS AG ADR	10,367.11	90.5300	16,929.11	6,562.00
422.0000	NOW INC/DE	8,195.33	36.2100	15,280.62	7,085.29
344.0000	NU SKIN ENTERPRISES INC	12,425.28	73.9600	25,442.24	13,016.96
4,917.0000	NTELOS HOLDINGS CORP	60,479.10	12.4600	61,265.82	786.72



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3,473.0000	NVIDIA CORP	45,792.17	18.5400	64,389.42	18,597.25
1,206.0000	OGE ENERGY CORP	35,186.97	39.0800	47,130.48	11,943.51
360.0000	O'REILLY AUTOMOTIVE INC	33,350.40	150.6000	54,216.00	20,865.60
420.0000	OFG BANCORP	4,863.60	18.4100	7,732.20	2,868.60
374.0000	OASIS PETROLEUM INC	10,079.30	55.8900	20,902.86	10,823.56
5,146.0000	OCCIDENTAL PETROLEUM CORP	253,723.20	102.6300	528,133.98	274,410.78
896.0000	OCEANEERING INTERNATIONAL INC	41,132.76	78.1300	70,004.48	28,871.72
384.0000	OCEANFIRST FINANCIAL CORP	4,995.84	16.5600	6,359.04	1,363.20
5,675.0000	OFFICE DEPOT INC	13,285.20	5.6900	32,290.75	19,005.55
536.0000	OIL STATES INTERNATIONAL INC	21,690.33	64.0900	34,352.24	12,661.91
207.0000	OLD DOMINION FREIGHT LINE INC	4,987.32	63.6800	13,181.76	8,194.44
596.0000	OLD NATIONAL BANCORP/IN	6,144.76	14.2800	8,510.88	2,366.12
1,639.0000	OLD REPUBLIC INTERNATIONAL COR	15,193.53	16.5400	27,109.06	11,915.53
217.0000	OLIN CORP	5,043.08	26.9200	5,841.64	798.56
1,230.0000	OMNICARE INC	29,520.00	66.5700	81,881.10	52,361.10
1,714.0000	OMNICOM GROUP INC	80,191.38	71.2200	122,071.08	41,879.70
639.0000	OMEGA HEALTHCARE INVESTORS INC	13,035.60	36.8600	23,553.54	10,517.94



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321.0000	ONE GAS INC	6,291.99	37.7500	12,117.75	5,825.76
1,285.0000	ONEOK INC	44,638.95	68.0800	87,482.80	42,843.85
399.0000	OPENTABLE INC	19,511.10	103.6000	41,336.40	21,825.30
1,470.0000	OPKO HEALTH INC	5,086.20	8.8400	12,994.80	7,908.60
21,893.0000	ORACLE CORP	393,393.87	40.5300	887,323.29	493,929.42
356.0000	ORBITAL SCIENCES CORP	5,211.84	29.5500	10,519.80	5,307.96
394.0000	ORITANI FINANCIAL CORP	4,988.04	15.3900	6,063.66	1,075.62
809.0000	ORMAT TECHNOLOGIES INC	14,788.52	28.8300	23,323.47	8,534.95
833.0000	OSHKOSH CORP	15,979.90	55.5300	46,256.49	30,276.59
164.0000	OWENS & MINOR INC	4,995.44	33.9800	5,572.72	577.28
1,078.0000	OWENS CORNING	28,408.02	38.6800	41,697.04	13,289.02
1,562.0000	OWENS-ILLINOIS INC	39,238.68	34.6400	54,107.68	14,869.00
155.0000	OXFORD INDUSTRIES INC	5,068.50	66.6700	10,333.85	5,265.35
146.0000	PDC ENERGY INC	4,333.28	63.1500	9,219.90	4,886.62
1,712.0000	PDL BIOPHARMA INC	10,144.34	9.6800	16,572.16	6,427.82
2,179.0000	PHH CORP	44,774.62	22.9800	50,073.42	5,298.80
2,824.0000	PNC FINANCIAL SERVICES GROUP I	193,936.56	89.0500	251,477.20	57,540.64



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545.0000	PNM RESOURCES INC	8,910.75	29.3300	15,984.85	7,074.10
916.0000	PPG INDUSTRIES INC	103,567.72	210.1500	192,497.40	88,929.68
1,102.0000	PPL CORP	31,406.89	35.5300	39,154.06	7,747.17
529.0000	PVH CORP	43,519.81	116.6000	61,681.40	18,161.59
996.0000	PTC INC	22,294.00	38.8000	38,644.80	16,350.80
2,578.0000	PACCAR INC	97,811.90	62.8300	161,975.74	64,163.84
525.0000	PACKAGING CORP OF AMERICA	19,952.55	71.4900	37,532.25	17,579.70
1,047.0000	PACWEST BANCORP	22,495.44	43.1700	45,198.99	22,703.55
818.0000	PALL CORP	25,332.81	85.3900	69,849.02	44,516.21
427.0000	PALO ALTO NETWORKS INC	24,001.67	83.8500	35,803.95	11,802.28
479.0000	PANDORA MEDIA INC	4,746.89	29.5000	14,130.50	9,383.61
718.0000	PAPA JOHN'S INTERNATIONAL INC	12,974.26	42.3900	30,436.02	17,461.76
108.0000	PAREXEL INTERNATIONAL CORP	2,409.48	52.8400	5,706.72	3,297.24
81.0000	PARK NATIONAL CORP	5,158.89	77.2000	6,253.20	1,094.31
841.0000	PARKER DRILLING CO	4,734.83	6.5200	5,483.32	748.49
1,301.0000	PARKER HANNIFIN CORP	67,930.06	125.7300	163,574.73	95,644.67
2,037.0000	PATTERN ENERGY GROUP INC	65,896.95	33.1100	67,445.07	1,548.12



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649.0000	PATTERSON COS INC	20,540.85	39.5100	25,641.99	5,101.14
875.0000	PATTERSON-UTI ENERGY INC	19,481.82	34.9400	30,572.50	11,090.68
1,863.0000	PAYCHEX INC	58,602.70	41.5600	77,426.28	18,823.58
272.0000	PEBBLEBROOK HOTEL TRUST	5,143.52	36.9600	10,053.12	4,909.60
427.0000	PENN NATIONAL GAMING INC	3,633.04	12.1400	5,183.78	1,550.74
2,127.0000	PENN VIRGINIA CORP	10,018.17	16.9500	36,052.65	26,034.48
8,500.0000	JC PENNEY CO INC	66,059.98	9.0500	76,925.00	10,865.02
1,383.0000	PENNSYLVANIA REAL ESTATE INVES	19,071.57	18.8200	26,028.06	6,956.49
710.0000	PENSKE AUTOMOTIVE GROUP INC	10,799.10	49.5000	35,145.00	24,345.90
1,540.0000	PEOPLE'S UNITED FINANCIAL INC	19,993.42	15.1700	23,361.80	3,368.38
1,325.0000	PEPCO HOLDINGS INC	36,318.25	27.4800	36,411.00	92.75
7,747.0000	PEPSICO INC	505,484.27	89.3400	692,116.98	186,632.71
335.0000	PERKINELMER INC	11,241.47	46.8400	15,691.40	4,449.93
503.0000	PETSMART INC	22,544.46	59.8000	30,079.40	7,534.94
459.0000	PHARMACYCLICS INC	26,819.37	89.7100	41,176.89	14,357.52
26,376.0000	PFIZER INC	648,678.87	29.6800	782,839.68	134,160.81
395.0000	PHARMERICA CORP	5,186.35	28.5900	11,293.05	6,106.70



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8,337.0000	PHILIP MORRIS INTERNATIONAL IN	345,437.09	84.3100	702,892.47	357,455.38
4,086.0000	PHILLIPS 66	111,081.33	80.4300	328,636.98	217,555.65
170.0000	PIEDMONT NATURAL GAS CO INC	4,996.30	37.4100	6,359.70	1,363.40
402.0000	PIER 1 IMPORTS INC	4,582.80	15.4100	6,194.82	1,612.02
322.0000	PINNACLE FINANCIAL PARTNERS IN	4,842.88	39.4800	12,712.56	7,869.68
361.0000	PINNACLE WEST CAPITAL CORP	14,934.57	57.8400	20,880.24	5,945.67
414.0000	PIONEER NATURAL RESOURCES CO	47,347.76	229.8100	95,141.34	47,793.58
1,055.0000	PITNEY BOWES INC	14,927.87	27.6200	29,139.10	14,211.23
287.0000	PLANTRONICS INC	10,135.20	48.0500	13,790.35	3,655.15
336.0000	PLEXUS CORP	10,175.50	43.2900	14,545.44	4,369.94
1,120.0000	PLUM CREEK TIMBER CO INC	40,068.49	45.1000	50,512.00	10,443.51
547.0000	POLARIS INDUSTRIES INC	35,156.31	130.2400	71,241.28	36,084.97
460.0000	POLYCOM INC	4,751.80	12.5300	5,763.80	1,012.00
409.0000	POLYONE CORP	9,742.38	42.1400	17,235.26	7,492.88
303.0000	POOL CORP	8,683.98	56.5600	17,137.68	8,453.70
1,294.0000	POPULAR INC	20,147.58	34.1800	44,228.92	24,081.34
123.0000	PORTFOLIO RECOVERY ASSOCIATES	4,940.09	59.5300	7,322.19	2,382.10



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173.0000	POST HOLDINGS INC	4,134.26	50.9100	8,807.43	4,673.17
313.0000	POST PROPERTIES INC	12,313.42	53.4600	16,732.98	4,419.56
181.0000	POWER INTEGRATIONS INC	6,646.32	57.5400	10,414.74	3,768.42
1,315.0000	POZEN INC	2,948.10	8.3300	10,953.95	8,005.85
1,910.0000	PRAXAIR INC	113,560.77	132.8400	253,724.40	140,163.63
903.0000	PRECISION CASTPARTS CORP	107,967.19	252.4000	227,917.20	119,950.01
643.0000	PREMIERE GLOBAL SERVICES INC	4,912.52	13.3500	8,584.05	3,671.53
1,841.0000	T ROWE PRICE GROUP INC	87,703.03	84.4100	155,398.81	67,695.78
306.0000	THE PRICELINE GROUP INC/THE	127,117.24	1,203.0000	368,118.00	241,000.76
78.0000	PRICESMART INC	6,124.56	87.0400	6,789.12	664.56
215.0000	PRIMERICA INC	5,022.40	47.8500	10,287.75	5,265.35
1,408.0000	PRINCIPAL FINANCIAL GROUP INC	42,730.56	50.4800	71,075.84	28,345.28
15,016.0000	PROCTER & GAMBLE CO/THE	937,169.61	78.5900	1,180,107.44	242,937.83
1,211.0000	PRIVATEBANCORP INC	12,001.01	29.0600	35,191.66	23,190.65
3,363.0000	PROGRESSIVE CORP/THE	66,217.47	25.3600	85,285.68	19,068.21
2,901.0000	PROLOGIS INC	86,339.55	41.0900	119,202.09	32,862.54
547.0000	PROSPECT CAPITAL CORP	5,141.80	10.6250	5,811.88	670.08



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295.0000	PROSPERITY BANCSHARES INC	12,522.75	62.6000	18,467.00	5,944.25
1,021.0000	PROTECTIVE LIFE CORP	22,863.55	69.3300	70,785.93	47,922.38
380.0000	PROVIDENT FINANCIAL SERVICES I	5,247.80	17.3200	6,581.60	1,333.80
1,253.0000	PRUDENTIAL FINANCIAL INC	72,250.49	88.7700	111,228.81	38,978.32
3,155.0000	PUBLIC SERVICE ENTERPRISE GROU	97,082.50	40.7900	128,692.45	31,609.95
805.0000	PUBLIC STORAGE	69,477.30	171.3500	137,936.75	68,459.45
932.0000	PZENA INVESTMENT MANAGEMENT IN	5,070.08	11.1600	10,401.12	5,331.04
122.0000	QUAKER CHEMICAL CORP	4,941.00	76.7900	9,368.38	4,427.38
9,709.0000	QUALCOMM INC	367,676.66	79.2000	768,952.80	401,276.14
311.0000	QUANEX BUILDING PRODUCTS CORP	4,948.01	17.8700	5,557.57	609.56
1,445.0000	QUANTA SERVICES INC	33,426.46	34.5800	49,968.10	16,541.64
151.0000	QUESTCOR PHARMACEUTICALS INC	4,877.30	92.4900	13,965.99	9,088.69
456.0000	QUESTAR CORP	6,560.05	24.8000	11,308.80	4,748.75
5,525.0000	QUICKSILVER RESOURCES INC	9,337.25	2.6700	14,751.75	5,414.50
1,108.0000	RAIT FINANCIAL TRUST	5,008.16	8.2700	9,163.16	4,155.00
166.0000	RLI CORP	4,999.09	45.7800	7,599.48	2,600.39
281.0000	RLJ LODGING TRUST	4,804.00	28.8900	8,118.09	3,314.09



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752.0000	RPM INTERNATIONAL INC DELAWARE	19,908.98	46.1800	34,727.36	14,818.38
267.0000	RPX CORP	3,393.57	17.7500	4,739.25	1,345.68
224.0000	RTI INTERNATIONAL METALS INC	4,948.16	26.5900	5,956.16	1,008.00
4,385.0000	RADISYS CORP	10,077.61	3.4900	15,303.65	5,226.04
3,533.0000	RALLY SOFTWARE DEVELOPMENT CORP	37,767.77	10.8900	38,474.37	706.60
506.0000	RALPH LAUREN CORP	42,339.55	160.6900	81,309.14	38,969.59
680.0000	RAMCO-GERSHENSON PROPERTIES TR	10,145.60	16.6200	11,301.60	1,156.00
951.0000	RANGE RESOURCES CORP	49,116.77	86.9500	82,689.45	33,572.68
186.0000	RAVEN INDUSTRIES INC	4,954.11	33.1400	6,164.04	1,209.93
1,118.0000	RAYMOND JAMES FINANCIAL INC	34,333.78	50.7300	56,716.14	22,382.36
92.0000	RAYONIER INC	2,846.15	35.5500	3,270.60	424.45
30.6670	RAYONIER ADVANCED MATERIALS	1,019.08	38.7500	1,188.35	169.27
2,345.0000	RAYTHEON CO	112,928.70	92.2500	216,326.25	103,397.55
130.0000	RBC BEARINGS INC	4,838.60	64.0500	8,326.50	3,487.90
149.0000	REALTY INCOME CORP	4,931.90	44.4200	6,618.58	1,686.68
436.0000	RED HAT INC	20,825.38	55.2700	24,097.72	3,272.34



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603.0000	REDWOOD TRUST INC	9,919.35	19.4700	11,740.41	1,821.06
418.0000	REGAL ENTERTAINMENT GROUP	4,928.22	21.1000	8,819.80	3,891.58
562.0000	REGENCY CENTERS CORP	23,098.20	55.6800	31,292.16	8,193.96
23.0000	REGENERON PHARMACEUTICALS INC	760.61	282.4700	6,496.81	5,736.20
6,294.0000	REGIONS FINANCIAL CORP	41,552.58	10.6200	66,842.28	25,289.70
526.0000	REINSURANCE GROUP OF AMERICA I	28,049.28	78.9000	41,501.40	13,452.12
473.0000	RELIANCE STEEL & ALUMINUM CO	23,309.44	73.7100	34,864.83	11,555.39
345.0000	RENASANT CORP	4,988.70	29.0700	10,029.15	5,040.45
880.0000	RENEWABLE ENERGY GROUP INC	6,186.40	11.4700	10,093.60	3,907.20
2,419.0000	RENTECH INC	3,773.64	2.5900	6,265.21	2,491.57
2,250.0000	REPUBLIC SERVICES INC	55,838.60	37.9700	85,432.50	29,593.90
966.0000	RESMED INC	24,246.60	50.6300	48,908.58	24,661.98
358.0000	RESOLUTE FST PRODS INC	4,908.18	16.7800	6,007.24	1,099.06
316.0000	REVLON INC	4,954.88	30.5000	9,638.00	4,683.12
1,344.0000	REYNOLDS AMERICAN INC	41,781.80	60.3500	81,110.40	39,328.60
6,267.0000	RIGEL PHARMACEUTICALS INC	16,607.55	3.6300	22,749.21	6,141.66
4,113.0000	RINGCENTRAL INC	61,941.78	15.1300	62,229.69	287.91



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2,546.0000	RIVERBED TECHNOLOGY INC	42,348.66	20.6300	52,523.98	10,175.32
924.0000	ROBERT HALF INTERNATIONAL INC	28,297.13	47.7400	44,111.76	15,814.63
436.0000	ROCK TENN CO	28,008.64	105.5900	46,037.24	18,028.60
1,048.0000	ROCKWELL AUTOMATION INC	60,101.96	125.1600	131,167.68	71,065.72
833.0000	ROCKWELL COLLINS INC	45,768.43	78.1400	65,090.62	19,322.19
283.0000	ROCKWOOD HOLDINGS INC	18,178.26	75.9900	21,505.17	3,326.91
324.0000	ROPER INDUSTRIES INC	38,066.76	146.0100	47,307.24	9,240.48
708.0000	ROSETTA STONE INC	5,210.88	9.7200	6,881.76	1,670.88
147.0000	ROUSE PROPERTIES INC	1,621.41	17.1100	2,515.17	893.76
280.0000	ROVI CORP	5,056.80	23.9600	6,708.80	1,652.00
275.0000	RUSH ENTERPRISES INC	5,049.00	34.6700	9,534.25	4,485.25
323.0000	RYDER SYSTEM INC	16,910.88	88.0900	28,453.07	11,542.19
603.0000	RYMAN HOSPITALITY PROPERTIES	22,823.55	48.1500	29,034.45	6,210.90
281.0000	S&T BANCORP INC	4,979.32	24.8500	6,982.85	2,003.53
623.0000	SBA COMMUNICATIONS CORP	25,290.00	102.3000	63,732.90	38,442.90
1,749.0000	SEI INVESTMENTS CO	35,319.39	32.7700	57,314.73	21,995.34
214.0000	SJW CORP	4,962.66	27.2000	5,820.80	858.14



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837.0000	SL GREEN REALTY CORP	51,158.20	109.4100	91,576.17	40,417.97
2,501.0000	SLM CORP	14,947.14	8.3100	20,783.31	5,836.17
188.0000	SPX CORP	13,088.56	108.2100	20,343.48	7,254.92
311.0000	SS&C TECHNOLOGIES HOLDINGS INC	5,128.39	44.2200	13,752.42	8,624.03
865.0000	SWS GROUP INC	4,887.25	7.2800	6,297.20	1,409.95
120.0000	SAFETY INSURANCE GROUP INC	4,950.00	51.3800	6,165.60	1,215.60
542.0000	SAFEWAY INC	11,783.08	34.3400	18,612.28	6,829.20
411.0000	ST JOE CO/THE	5,930.73	25.4300	10,451.73	4,521.00
2,274.0000	ST JUDE MEDICAL INC	80,504.70	69.2500	157,474.50	76,969.80
3,312.0000	SALESFORCE.COM INC	103,715.75	58.0800	192,360.96	88,645.21
367.0000	SALIX PHARMACEUTICALS LTD	13,982.70	123.3500	45,269.45	31,286.75
830.0000	SALLY BEAUTY HOLDINGS INC	15,641.11	25.0800	20,816.40	5,175.29
109.0000	SANDERSON FARMS INC	5,261.43	97.2000	10,594.80	5,333.37
1,585.0000	SANDISK CORP	39,583.16	104.4300	165,521.55	125,938.39
276.0000	SANDY SPRING BANCORP INC	4,832.76	24.9100	6,875.16	2,042.40
1,407.0000	SANMINA CORP	12,883.59	22.7800	32,051.46	19,167.87
1,451.0000	SCANA CORP	49,643.40	53.8100	78,078.31	28,434.91



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166.0000	SCANSOURCE INC	4,965.06	38.0800	6,321.28	1,356.22
466.0000	HENRY SCHEIN INC	35,281.04	118.6550	55,293.23	20,012.19
8,245.0000	SCHLUMBERGER LTD	504,218.13	117.9500	972,497.75	468,279.62
194.0000	SCHOLASTIC CORP	4,834.48	34.0900	6,613.46	1,778.98
7,756.0000	CHARLES SCHWAB CORP/THE	94,455.14	26.9300	208,869.08	114,413.94
223.0000	SCIENCE APPLICATIONS INTERNATI	6,404.61	44.1600	9,847.68	3,443.07
515.0000	SCIENTIFIC GAMES CORP	5,000.65	11.1200	5,726.80	726.15
112.0000	SCOTTS MIRACLE-GRO CO/THE	4,957.12	56.8600	6,368.32	1,411.20
748.0000	SCRIPPS NETWORKS INTERACTIVE I	40,158.52	81.1400	60,692.72	20,534.20
247.0000	SEACOR HOLDINGS INC	15,683.48	82.2500	20,315.75	4,632.27
662.0000	SEALED AIR CORP	14,890.40	34.1700	22,620.54	7,730.14
67.0000	SEARS CANADA INC	728.15	13.6100	911.87	183.72
1,234.0000	SEATTLE GENETICS INC	27,004.51	38.2500	47,200.50	20,195.99
600.0000	SELECT MEDICAL HOLDINGS CORP	5,106.00	15.6000	9,360.00	4,254.00
340.0000	SELECTIVE INSURANCE GROUP INC	5,392.40	24.7200	8,404.80	3,012.40
190.0000	SEMGROUP CORP	4,866.93	78.8500	14,981.50	10,114.57
1,489.0000	SEMPRA ENERGY	78,923.46	104.7100	155,913.19	76,989.73



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711.0000	SENIOR HOUSING PROPERTIES TRUS	14,980.77	24.2900	17,270.19	2,289.42
265.0000	SENSIENT TECHNOLOGIES CORP	9,877.89	55.7200	14,765.80	4,887.91
1,811.0000	SERVICE CORP INTERNATIONAL/US	14,958.86	20.7200	37,523.92	22,565.06
498.0000	SHENANDOAH TELECOMMUNICATIONS	5,522.82	30.4600	15,169.08	9,646.26
23.0000	SHERWIN-WILLIAMS CO/THE	1,272.67	206.9100	4,758.93	3,486.26
574.0000	SHUTTERFLY INC	17,036.32	43.0600	24,716.44	7,680.12
767.0000	SIGMA-ALDRICH CORP	28,942.32	101.4800	77,835.16	48,892.84
260.0000	SIGNATURE BANK/NEW YORK NY	14,513.20	126.1800	32,806.80	18,293.60
2,717.0000	SIGA TECHNOLOGIES INC	6,629.48	2.8200	7,661.94	1,032.46
280.0000	SILICON LABORATORIES INC	10,939.60	49.2500	13,790.00	2,850.40
124.0000	SILGAN HOLDINGS INC	4,968.68	50.8200	6,301.68	1,333.00
202.0000	SIMMONS FIRST NATIONAL CORP	4,930.82	39.3900	7,956.78	3,025.96
1,522.0000	SIMON PROPERTY GROUP INC	129,174.72	166.2800	253,078.16	123,903.44
338.0000	SIMPLICITY BANCORP	4,912.76	17.4500	5,898.10	985.34
261.0000	SIMPSON MANUFACTURING CO INC	7,668.18	36.3600	9,489.96	1,821.78
24.0000	SIRONA DENTAL SYSTEMS INC	1,250.40	82.4600	1,979.04	728.64
25,201.0000	SIRIUS XM HOLDINGS INC	49,477.70	3.4600	87,195.46	37,717.76



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284.0000	SIX FLAGS ENTERTAINMENT CORP	5,236.05	42.5500	12,084.20	6,848.15
351.0000	SKECHERS U.S.A. INC	4,794.66	45.7000	16,040.70	11,246.04
1,809.0000	SKYWORKS SOLUTIONS INC	28,039.50	46.9600	84,950.64	56,911.14
1,100.0000	SMITH & WESSON HOLDING CORP	8,767.00	14.5400	15,994.00	7,227.00
416.0000	AO SMITH CORP	12,858.56	49.5800	20,625.28	7,766.72
434.0000	JM SMUCKER CO/THE	38,569.58	106.5700	46,251.38	7,681.80
284.0000	SNAP-ON INC	14,603.28	118.5200	33,659.68	19,056.40
229.0000	SNYDERS-LANCE INC	4,813.58	26.4600	6,059.34	1,245.76
575.0000	SOLARWINDS INC	20,319.17	38.6600	22,229.50	1,910.33
192.0000	SOLERA HOLDINGS INC	10,617.60	67.1500	12,892.80	2,275.20
375.0000	SONIC AUTOMOTIVE INC	5,231.25	26.6800	10,005.00	4,773.75
693.0000	SONOCO PRODUCTS CO	21,755.05	43.9300	30,443.49	8,688.44
268.0000	SOUTH STATE CORP	6,934.43	61.0000	16,348.00	9,413.57
4,358.0000	SOUTHERN CO	152,061.76	45.3800	197,766.04	45,704.28
304.0000	SOUTHSIDE BANCSHARES INC	5,037.30	28.9600	8,803.84	3,766.54
4,521.0000	SOUTHWEST AIRLINES CO	37,786.12	26.8600	121,434.06	83,647.94
133.0000	SOUTHWEST GAS CORP	4,984.84	52.7900	7,021.07	2,036.23



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2,095.0000	SOUTHWESTERN ENERGY CO	71,639.67	45.4900	95,301.55	23,661.88
125.0000	SOVRAN SELF STORAGE INC	4,940.00	77.2500	9,656.25	4,716.25
903.0000	SPARTANNASH CO	14,948.21	21.0100	18,972.03	4,023.82
4,061.0000	SPECTRA ENERGY CORP	102,469.63	42.4800	172,511.28	70,041.65
363.0000	SPEEDWAY MOTORSPORTS INC	5,027.55	18.2500	6,624.75	1,597.20
995.0000	SPIRIT AEROSYSTEMS HOLDINGS IN	19,907.90	33.7000	33,531.50	13,623.60
415.0000	SPIRIT AIRLINES INC	4,988.47	63.2400	26,244.60	21,256.13
4,046.0000	SPIRIT RLTY CAP INC NEW	40,055.40	11.3600	45,962.56	5,907.16
304.0000	SPLUNK INC	13,984.00	55.3300	16,820.32	2,836.32
4,581.0000	SPRINT CORP	27,486.00	8.5300	39,075.93	11,589.93
1,048.0000	STANLEY BLACK & DECKER INC	63,638.44	87.8200	92,035.36	28,396.92
4,271.0000	STARBUCKS CORP	146,604.17	77.3800	330,489.98	183,885.81
588.0000	STARWOOD PROPERTY TRUST INC	11,287.94	23.7700	13,976.76	2,688.82
1,276.0000	STARWOOD HOTELS & RESORTS WORL	73,654.70	80.8200	103,126.32	29,471.62
858.0000	STATE STREET CORP	49,029.82	67.2600	57,709.08	8,679.26
316.0000	STEEL DYNAMICS INC	4,951.72	17.9500	5,672.20	720.48
714.0000	STERICYCLE INC	41,276.93	118.4200	84,551.88	43,274.95



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374.0000	STERIS CORP	11,757.26	53.4800	20,001.52	8,244.26
726.0000	STIFEL FINANCIAL CORP	24,700.72	47.3500	34,376.10	9,675.38
2,713.0000	STILLWATER MINING CO	23,413.19	17.5500	47,613.15	24,199.96
502.0000	STONE ENERGY CORP	13,827.02	46.7900	23,488.58	9,661.56
1,115.0000	STRATEGIC HOTELS & RESORTS INC	6,812.65	11.7100	13,056.65	6,244.00
2,243.0000	STRYKER CORP	111,458.04	84.3200	189,129.76	77,671.72
115.0000	STURM RUGER & CO INC	3,192.40	59.0100	6,786.15	3,593.75
1,232.0000	SUFFOLK BANCORP	11,160.07	22.3100	27,485.92	16,325.85
2,155.0000	SUN BANCORP INC/NJ	5,348.71	4.0100	8,641.55	3,292.84
661.0000	SUNCOKE ENERGY INC	7,339.86	21.5000	14,211.50	6,871.64
3,202.0000	SUNEDISON INC	6,884.30	22.6000	72,365.20	65,480.90
3,237.0000	SUNESIS PHARMACEUTICALS INC	13,239.33	6.5200	21,105.24	7,865.91
1,417.0000	SUNSTONE HOTEL INVESTORS INC	11,610.29	14.9300	21,155.81	9,545.52
2,833.0000	SUNTRUST BANKS INC	74,836.57	40.0600	113,489.98	38,653.41
1,893.0000	SUPERVALU INC	5,054.31	8.2200	15,560.46	10,506.15
2,512.0000	SUPPORT.COM INC	5,237.77	2.7100	6,807.52	1,569.75
2,588.0000	SUSQUEHANNA BANCSHARES INC	20,544.06	10.5600	27,329.28	6,785.22



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633.0000	SYMANTEC CORP	11,583.90	22.9000	14,495.70	2,911.80
1,661.0000	SYMETRA FINANCIAL CORP	18,286.67	22.7400	37,771.14	19,484.47
194.0000	SYNAPTICS INC	4,855.82	90.6400	17,584.16	12,728.34
411.0000	SYNAGEVA BIOPHARMA CORP	18,889.56	104.8000	43,072.80	24,183.24
923.0000	SYNOPSYS INC	23,407.28	38.8200	35,830.86	12,423.58
691.0000	SYNOVUS FINANCIAL CORP	8,851.71	24.3800	16,846.58	7,994.87
172.0000	SYNNEX CORP	5,144.52	72.8500	12,530.20	7,385.68
1,037.0000	SYNUTRA INTERNATIONAL INC	4,979.47	6.7100	6,958.27	1,978.80
1,326.0000	SYSCO CORP	41,322.72	37.4500	49,658.70	8,335.98
2,285.0000	TCF FINANCIAL CORP	23,307.00	16.3700	37,405.45	14,098.45
1,077.0000	TD AMERITRADE HOLDING CORP	20,032.20	31.3500	33,763.95	13,731.75
3,336.0000	TECO ENERGY INC	52,559.01	18.4800	61,649.28	9,090.27
519.0000	TFS FINANCIAL CORP	4,899.36	14.2600	7,400.94	2,501.58
2,481.0000	TJX COS INC	38,777.25	53.1500	131,865.15	93,087.90
3,178.0000	T-MOBILE US INC	86,007.51	33.6200	106,844.36	20,836.85
849.0000	TRW AUTOMOTIVE HOLDINGS CORP	26,017.98	89.5200	76,002.48	49,984.50
948.0000	TW TELECOM INC	18,988.44	40.3100	38,213.88	19,225.44



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462.0000	TAKE-TWO INTERACTIVE SOFTWARE	6,842.22	22.2400	10,274.88	3,432.66
183.0000	TANGER FACTORY OUTLET CENTERS	4,884.27	34.9700	6,399.51	1,515.24
180.0000	TAUBMAN CENTERS INC	7,216.20	75.8100	13,645.80	6,429.60
231.0000	TEAM HEALTH HOLDINGS INC	5,128.20	49.9400	11,536.14	6,407.94
293.0000	TECH DATA CORP	13,510.23	62.5200	18,318.36	4,808.13
135.0000	TECHNE CORP	9,942.75	92.5700	12,496.95	2,554.20
229.0000	TELEDYNE TECHNOLOGIES INC	14,788.97	97.1700	22,251.93	7,462.96
269.0000	TELEFLEX INC	14,883.77	105.6000	28,406.40	13,522.63
90.0000	TEMPUR SEALY INTERNATIONAL INC	3,727.80	59.7000	5,373.00	1,645.20
879.0000	TENET HEALTHCARE CORP	19,410.19	46.9400	41,260.26	21,850.07
8.0000	TENNANT CO	306.32	76.3200	610.56	304.24
373.0000	TENNECO INC	10,089.65	65.7000	24,506.10	14,416.45
1,238.0000	TERADYNE INC	17,109.16	19.6000	24,264.80	7,155.64
1,161.0000	TEREX CORP	18,634.05	41.1000	47,717.10	29,083.05
151.0000	TESLA MOTORS INC	4,163.83	240.0600	36,249.06	32,085.23
392.0000	TETRA TECH INC	8,874.88	27.5000	10,780.00	1,905.12
279.0000	TESSERA TECHNOLOGIES INC	4,511.43	22.0800	6,160.32	1,648.89



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7,279.0000	TEXAS INSTRUMENTS INC	244,128.67	47.7900	347,863.41	103,734.74
1,748.0000	TEXTRON INC	31,848.56	38.2900	66,930.92	35,082.36
662.0000	THERAVANCE INC	14,546.30	29.7800	19,714.36	5,168.06
2,629.0000	THERMO FISHER SCIENTIFIC INC	103,380.78	118.0000	310,222.00	206,841.22
2,270.0000	THOMSON REUTERS CORP	67,748.04	36.3600	82,537.20	14,789.16
237.0000	THOR INDUSTRIES INC	7,245.09	56.8700	13,478.19	6,233.10
554.0000	THORATEC CORP	15,622.80	34.8600	19,312.44	3,689.64
4,130.0000	3M CO	309,151.86	143.2400	591,581.20	282,429.34
804.0000	TIFFANY & CO	26,927.00	100.2500	80,601.00	53,674.00
709.0000	TIME INC	8,685.35	24.2200	17,171.98	8,486.63
5,673.0000	TIME WARNER INC	210,551.20	70.2500	398,528.25	187,977.05
1,874.0000	TIME WARNER CABLE INC	103,713.43	147.3000	276,040.20	172,326.77
552.0000	TIMKEN CO	25,435.06	67.8400	37,447.68	12,012.62
1,306.0000	TOLL BROTHERS INC	28,007.74	36.9000	48,191.40	20,183.66
130.0000	TOMPKINS FINANCIAL CORP	5,062.20	48.1800	6,263.40	1,201.20
622.0000	TORCHMARK CORP	26,189.27	81.9200	50,954.24	24,764.97
812.0000	TORO CO/THE	20,056.40	63.6000	51,643.20	31,586.80



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360.0000	TOWERS WATSON & CO	22,698.00	104.2300	37,522.80	14,824.80
1,020.0000	TOTAL SYSTEM SERVICES INC	18,125.40	31.4100	32,038.20	13,912.80
52.0000	TOWN SPORTS INTERNATIONAL HOLD	365.48	6.6500	345.80	19.68-
395.0000	TOWNEBANK/PORTSMOUTH VA	5,100.49	15.7100	6,205.45	1,104.96
804.0000	TRACTOR SUPPLY CO	26,097.84	60.4000	48,561.60	22,463.76
1,823.0000	TRAVELERS COS INC/THE	84,751.63	94.0700	171,489.61	86,737.98
169.0000	TREEHOUSE FOODS INC	9,521.83	80.0700	13,531.83	4,010.00
422.0000	TRICO BANCSHARES	6,055.70	23.1400	9,765.08	3,709.38
1,544.0000	TRIMBLE NAVIGATION LTD	28,618.04	36.9500	57,050.80	28,432.76
1,700.0000	TRINITY INDUSTRIES INC	17,187.00	43.7200	74,324.00	57,137.00
2,502.0000	TRIQUINT SEMICONDUCTOR INC	11,934.54	15.8100	39,556.62	27,622.08
236.0000	TRIUMPH GROUP INC	11,346.88	69.8200	16,477.52	5,130.64
864.0000	TRIPADVISOR INC	30,656.76	108.6600	93,882.24	63,225.48
345.0000	TRUEBLUE INC	5,023.20	27.5700	9,511.65	4,488.45
1,483.0000	TRULIA INC	70,427.67	47.3800	70,264.54	163.13-
1,602.0000	TUESDAY MORNING CORP	5,142.42	17.8200	28,547.64	23,405.22
434.0000	TUPPERWARE BRANDS CORP	20,697.46	83.7000	36,325.80	15,628.34



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12,630.0000	TWENTY FIRST CENTURY FOX INC	216,805.30	35.1500	443,944.50	227,139.20
2,472.0000	TYSON FOODS INC	40,278.10	37.5400	92,798.88	52,520.78
1,250.0000	UDR INC	28,512.50	28.6300	35,787.50	7,275.00
705.0000	UGI CORP	20,779.95	50.5000	35,602.50	14,822.55
5,307.0000	US BANCORP	168,442.66	43.3200	229,899.24	61,456.58
136.0000	UNS ENERGY CORP	4,968.08	60.4100	8,215.76	3,247.68
348.0000	URS CORP	14,407.20	45.8500	15,955.80	1,548.60
741.0000	USG CORP	19,953.72	30.1300	22,326.33	2,372.61
437.0000	USA MOBILITY INC	4,959.95	15.4000	6,729.80	1,769.85
412.0000	US SILICA HOLDINGS INC	4,865.72	55.4400	22,841.28	17,975.56
285.0000	ULTA SALON COSMETICS & FRAGRAN	17,906.55	91.4100	26,051.85	8,145.30
96.0000	ULTIMATE SOFTWARE GROUP INC	9,854.40	138.1700	13,264.32	3,409.92
1,040.0000	ULTRA PETROLEUM CORP	19,664.95	29.6900	30,877.60	11,212.65
2,143.0000	UMPQUA HOLDINGS CORP	22,843.44	17.9200	38,402.56	15,559.12
1,518.0000	UNDER ARMOUR INC	31,378.68	59.4900	90,305.82	58,927.14
1,210.0000	UNION BANKSHARES CORP	14,442.71	25.6500	31,036.50	16,593.79
4,914.0000	UNION PACIFIC CORP	146,104.71	99.7500	490,171.50	344,066.79



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299.0000	UNISYS CORP	4,688.32	24.7400	7,397.26	2,708.94
300.0000	UNIT CORP	12,797.28	68.8300	20,649.00	7,851.72
773.0000	UNITED COMMUNITY BANKS	5,094.07	16.3700	12,654.01	7,559.94
762.0000	UNITED BANKSHARES INC	11,516.06	32.3300	24,635.46	13,119.40
1,795.0000	UNITED CONTINENTAL HOLDINGS IN	43,020.22	41.0700	73,720.65	30,700.43
942.0000	UNITED FINL BANCORP INC	9,977.00	13.5500	12,764.10	2,787.10
277.0000	UNITED FIRE GROUP INC	4,855.81	29.3200	8,121.64	3,265.83
28.0000	UNITED NATURAL FOODS INC	1,354.64	65.1000	1,822.80	468.16
3,737.0000	UNITED PARCEL SERVICE INC	272,974.02	102.6600	383,640.42	110,666.40
877.0000	UNITED RENTALS INC	29,665.30	104.7300	91,848.21	62,182.91
1,122.0000	UNITED STATES STEEL CORP	21,528.28	26.0400	29,216.88	7,688.60
144.0000	UNITED STATIONERS INC	4,908.96	41.4700	5,971.68	1,062.72
5,385.0000	UNITED TECHNOLOGIES CORP	342,881.26	115.4500	621,698.25	278,816.99
577.0000	UNITED THERAPEUTICS CORP	30,322.24	88.4900	51,058.73	20,736.49
6,256.0000	UNITEDHEALTH GROUP INC	312,731.64	81.7500	511,428.00	198,696.36
723.0000	UNITIL CORP	19,860.65	33.8300	24,459.09	4,598.44
322.0000	UNIVERSAL ELECTRONICS INC	5,255.04	48.8800	15,739.36	10,484.32



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251.0000	UNIVERSAL FOREST PRODUCTS INC	9,814.10	48.2700	12,115.77	2,301.67
346.0000	UNIVERSAL HEALTH SERVICES INC	14,933.36	95.7600	33,132.96	18,199.60
2,315.0000	UNUM GROUP	45,314.50	34.7600	80,469.40	35,154.90
723.0000	URBAN OUTFITTERS INC	22,291.90	33.8600	24,480.78	2,188.88
776.0000	VCA INC	16,594.96	35.0900	27,229.84	10,634.88
1,188.0000	VF CORP	42,730.97	63.0000	74,844.00	32,113.03
3.0000	VSE CORP	66.60	70.3200	210.96	144.36
226.0000	VAIL RESORTS INC	9,991.46	77.1800	17,442.68	7,451.22
3,315.0000	VALERO ENERGY CORP	84,158.71	50.1000	166,081.50	81,922.79
241.0000	VALMONT INDUSTRIES INC	20,325.94	151.9500	36,619.95	16,294.01
473.0000	VALSPAR CORP/THE	22,173.28	76.1900	36,037.87	13,864.59
2,439.0000	VALUEVISION MEDIA INC	5,195.07	4.9900	12,170.61	6,975.54
1,059.0000	VARIAN MEDICAL SYSTEMS INC	51,366.80	83.1400	88,045.26	36,678.46
1,055.0000	VECTOR GROUP LTD	15,463.29	20.6800	21,817.40	6,354.11
508.0000	VENTAS INC	22,280.72	64.1000	32,562.80	10,282.08
1,840.0000	VERIFONE SYSTEMS INC	45,116.80	36.7500	67,620.00	22,503.20
1,238.0000	VERISIGN INC	29,146.48	48.8100	60,426.78	31,280.30



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17,486.0000	VERIZON COMMUNICATIONS INC	603,755.79	48.9300	855,589.98	251,834.19
145.0000	VERINT SYSTEMS INC	5,067.75	49.0500	7,112.25	2,044.50
1,120.0000	VERISK ANALYTICS INC	52,152.76	60.0200	67,222.40	15,069.64
1,564.0000	VERTEX PHARMACEUTICALS INC	57,135.04	94.6800	148,079.52	90,944.48
89.0000	VIASAT INC	3,721.09	57.9600	5,158.44	1,437.35
3,550.0000	VIACOM INC	132,577.60	86.7300	307,891.50	175,313.90
2,453.0000	VISA INC	218,194.35	210.7100	516,871.63	298,677.28
2,019.0000	VISHAY INTERTECHNOLOGY INC	19,059.36	15.4900	31,274.31	12,214.95
371.0000	VISHAY PRECISION GROUP INC	4,960.27	16.4600	6,106.66	1,146.39
258.0000	VISTEON CORP/NEW	14,889.92	97.0100	25,028.58	10,138.66
9,448.0000	VIVUS INC	49,413.04	5.3200	50,263.36	850.32
332.0000	VLASIC FOODS INTL INC COM	3,527.39	10.6246	3,527.39	0.00
7,229.0000	VONAGE HOLDINGS CORP	13,662.81	3.7500	27,108.75	13,445.94
806.0000	VORNADO REALTY TRUST	67,999.41	106.7300	86,024.38	18,024.97
806.0000	VULCAN MATERIALS CO	36,084.24	63.7500	51,382.50	15,298.26
90.0000	WD-40 CO	4,888.80	75.2200	6,769.80	1,881.00
213.0000	WABCO HOLDINGS INC	14,611.56	106.8200	22,752.66	8,141.10



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128.0000	WSFS FINANCIAL CORP	4,825.60	73.6700	9,429.76	4,604.16
545.0000	WABASH NATIONAL CORP	4,845.05	14.2500	7,766.25	2,921.20
320.0000	WABTEC CORP/DE	15,928.17	82.5900	26,428.80	10,500.63
8,937.0000	WAL-MART STORES INC	443,558.49	75.0700	670,900.59	227,342.10
4,812.0000	WALGREEN CO	215,722.59	74.1300	356,713.56	140,990.97
11,160.0000	WALTER ENERGY INC	61,380.00	5.4500	60,822.00	558.00-
2,180.0000	WALTER INVESTMENT MANAGEMENT C	64,375.40	29.7800	64,920.40	545.00
571.0000	WASHINGTON FEDERAL INC	9,889.72	22.4300	12,807.53	2,917.81
761.0000	WASHINGTON PRIME GROUP INC	8,059.00	18.7400	14,261.14	6,202.14
218.0000	WASHINGTON TRUST BANCORP INC	4,848.32	36.7700	8,015.86	3,167.54
715.0000	WASTE CONNECTIONS INC	22,350.90	48.5500	34,713.25	12,362.35
1,461.0000	WASTE MANAGEMENT INC	50,187.21	44.7300	65,350.53	15,163.32
320.0000	WATERS CORP	29,330.56	104.4400	33,420.80	4,090.24
189.0000	WATTS WATER TECHNOLOGIES INC	6,261.57	61.7300	11,666.97	5,405.40
222.0000	WEBMD HEALTH CORP	5,179.26	48.3000	10,722.60	5,543.34
721.0000	WEBSTER FINANCIAL CORP	14,170.57	31.5400	22,740.34	8,569.77
826.0000	WEINGARTEN REALTY INVESTORS	19,237.54	32.8400	27,125.84	7,888.30



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267.0000	WELLCARE HEALTH PLANS INC	13,107.03	74.6600	19,934.22	6,827.19
391.0000	WELLPOINT INC	24,460.96	107.6100	42,075.51	17,614.55
28,298.0000	WELLS FARGO & CO	990,749.95	52.5600	1,487,342.88	496,592.93
3,177.0000	WENDYS CO	14,804.82	8.5300	27,099.81	12,294.99
261.0000	WESBANCO INC	4,909.41	31.0400	8,101.44	3,192.03
380.0000	WESCO AIRCRAFT HOLDINGS INC	5,035.00	19.9600	7,584.80	2,549.80
576.0000	WESCO INTERNATIONAL INC	20,378.88	86.3800	49,754.88	29,376.00
306.0000	WEST PHARMACEUTICAL SERVICES I	9,691.02	42.1800	12,907.08	3,216.06
511.0000	WESTAR ENERGY INC	14,972.21	38.1900	19,515.09	4,542.88
232.0000	WESTAMERICA BANCORPORATION	10,068.80	52.2800	12,128.96	2,060.16
729.0000	WESTERN ALLIANCE BANCORP	4,891.59	23.8000	17,350.20	12,458.61
4,195.0000	WESTERN ASSET MORTGAGE CAPITAL	59,569.00	14.1700	59,443.15	125.85-
1,738.0000	WESTERN DIGITAL CORP	46,061.34	92.3000	160,417.40	114,356.06
332.0000	WESTERN REFINING INC	5,395.00	37.5500	12,466.60	7,071.60
636.0000	WESTLAKE CHEMICAL CORP	25,331.88	83.7600	53,271.36	27,939.48
135.0000	WESTWOOD HOLDINGS GROUP INC	4,885.65	60.0400	8,105.40	3,219.75
358.0000	WEX INC	20,422.49	104.9700	37,579.26	17,156.77



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3,579.0000	WEYERHAEUSER CO	57,274.05	33.0900	118,429.11	61,155.06
357.0000	WHIRLPOOL CORP	35,735.02	139.2200	49,701.54	13,966.52
713.0000	WHITEWAVE FOODS CO	7,275.94	32.3700	23,079.81	15,803.87
794.0000	WHITING PETROLEUM CORP	35,509.64	80.2500	63,718.50	28,208.86
1,552.0000	WHOLE FOODS MARKET INC	49,878.02	38.6300	59,953.76	10,075.74
137.0000	JOHN WILEY & SONS INC	4,945.70	60.5900	8,300.83	3,355.13
1,534.0000	WILLBROS GROUP INC	5,552.47	12.3500	18,944.90	13,392.43
3,869.0000	WILLIAMS COS INC/THE	79,894.30	58.2100	225,214.49	145,320.19
615.0000	WILLIAMS-SONOMA INC	21,863.25	71.7800	44,144.70	22,281.45
221.0000	WINTRUST FINANCIAL CORP	6,917.30	46.0000	10,166.00	3,248.70
1,305.0000	WISCONSIN ENERGY CORP	28,611.64	46.9200	61,230.60	32,618.96
387.0000	WOODWARD INC	12,527.19	50.1800	19,419.66	6,892.47
1,177.0000	WORKDAY INC	96,420.06	89.8600	105,765.22	9,345.16
99.0000	WORLD ACCEPTANCE CORP	6,197.40	75.9600	7,520.04	1,322.64
445.0000	WORLD FUEL SERVICES CORP	15,276.85	49.2300	21,907.35	6,630.50
361.0000	WORTHINGTON INDUSTRIES INC	7,104.48	43.0400	15,537.44	8,432.96
1,370.0000	WPX ENERGY INC	17,961.01	23.9100	32,756.70	14,795.69



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341.0000	WRIGHT MEDICAL GROUP INC	4,934.27	31.4000	10,707.40	5,773.13
1,099.0000	WYNDHAM WORLDWIDE CORP	39,201.38	75.7200	83,216.28	44,014.90
239.0000	WYNN RESORTS LTD	29,061.22	207.5600	49,606.84	20,545.62
1,915.0000	XILINX INC	45,059.95	47.3100	90,598.65	45,538.70
7,741.0000	XEROX CORP	63,377.01	12.4400	96,298.04	32,921.03
1,134.0000	XYLEM INC/NY	31,196.40	39.0800	44,316.72	13,120.32
5,364.0000	YAHOO! INC	103,264.62	35.1300	188,437.32	85,172.70
293.0000	YORK WATER CO	5,051.32	20.8200	6,100.26	1,048.94
1,430.0000	YUM! BRANDS INC	37,637.74	81.2000	116,116.00	78,478.26
552.0000	ZEBRA TECHNOLOGIES CORP	16,526.88	82.3200	45,440.64	28,913.76
585.0000	ZILLOW INC	66,597.51	142.9300	83,614.05	17,016.54
1,013.0000	ZIMMER HOLDINGS INC	68,539.07	103.8600	105,210.18	36,671.11
1,913.0000	ZIONS BANCORPORATION	29,670.63	29.4700	56,376.11	26,705.48
2,994.0000	ZOGENIX INC	5,080.22	2.0100	6,017.94	937.72
7,161.0000	ZYNGA INC	20,122.41	3.2100	22,986.81	2,864.40
TOTAL INVESTMENTS EQUITY		65,379,855.77		117,562,900.40	52,183,044.63
TOTAL INVESTMENT		65,665,057.36		117,848,101.99	52,183,044.63



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<u>INVESTMENTS CASH EQUIVALENTS</u>					
1,330,744.6400	FIDELITY INSTL MM PRIME 690	1,330,744.64	100.0000	1,330,744.64	0.00
TOTAL INVESTMENTS CASH EQUIVALENTS		1,330,744.64		1,330,744.64	0.00
<u>INVESTMENTS FIXED INCOME SECURITIES</u>					
100,000.0000	ACCO BRANDS CORP 6.750% 04/30/2020 DD 04/30/13	100,000.00	104.7500	104,750.00	4,750.00
150,000.0000	ADS WASTE HOLDINGS INC 8.250% 10/01/2020 DD 10/01/13	154,574.92	107.7500	161,625.00	7,050.08
175,000.0000	AES CORP/VA 4.875% 05/15/2023 DD 04/30/13	178,178.32	99.0000	173,250.00	4,928.32-
100,000.0000	AFFINIA GROUP INC 7.750% 05/01/2021 DD 11/01/13	102,313.99	105.2500	105,250.00	2,936.01
88,000.0000	AMHG MERGER SUB INC 9.250% 11/01/2018 DD 10/22/10	88,000.00	106.5000	93,720.00	5,720.00
175,000.0000	ALLIANCE DATA SYSTEMS COR 144A 6.375% 04/01/2020 DD 03/29/12	176,067.81	106.5000	186,375.00	10,307.19
100,000.0000	ALLIANCE DATA SYSTEMS COR 144A 5.250% 12/01/2017 DD 11/20/12	103,765.37	104.5000	104,500.00	734.63
150,000.0000	ALLISON TRANSMISSION INC 144A 7.125% 05/15/2019 DD 05/06/11	156,334.57	107.0000	160,500.00	4,165.43



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150,000.0000	ALPHABET HOLDING CO INC 7.750% 11/01/2017 DD 05/01/13	154,305.91	103.2500	154,875.00	569.09
200,000.0000	AMERICAN AXLE & MANUFACTURING 6.250% 03/15/2021 DD 02/28/13	211,278.54	107.5000	215,000.00	3,721.46
175,000.0000	AMERICAN BUILDERS & CONTR 144A 5.625% 04/15/2021 DD 04/16/13	175,518.24	103.5000	181,125.00	5,606.76
250,000.0000	AMERISTAR CASINOS INC 7.500% 04/15/2021 DD 10/15/11	255,063.29	107.7500	269,375.00	14,311.71
120,000.0000	AMERIGAS FINANCE LLC / AMERIGA 7.000% 05/20/2022 DD 01/12/12	121,411.87	110.7500	132,900.00	11,488.13
200,000.0000	ANCESTRY.COM INC 144A 9.625% 10/15/2018 DD 09/17/13	205,559.53	103.3750	206,750.00	1,190.47
275,000.0000	ARCELORMITTAL VAR RT 03/01/2021 DD 03/07/11	286,541.69	108.2500	297,687.50	11,145.81
150,000.0000	ATKORE 4/14 COV-LITE TL	149,270.95	99.9170	149,875.50	604.55
150,000.0000	ATWOOD OCEANICS INC 6.500% 02/01/2020 DD 01/18/12	155,520.74	106.6250	159,937.50	4,416.76
150,000.0000	BERRY PETROLEUM CO 6.750% 11/01/2020 DD 11/01/10	159,423.01	105.2500	157,875.00	1,548.01-
150,000.0000	BI-LO LLC / BI-LO FINANCE 144A 8.625% 09/15/2018 DD 09/20/13	149,844.01	101.5000	152,250.00	2,405.99
175,000.0000	BIOMET INC 6.500% 10/01/2020 DD 04/01/13	175,013.49	106.7500	186,812.50	11,799.01



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150,000.0000	BOMBARDIER INC 144A 6.125% 01/15/2023 DD 01/14/13	150,000.00	103.0000	154,500.00	4,500.00
150,000.0000	BRAND ENERGY & INFRASTRUC 144A 8.500% 12/01/2021 DD 11/26/13	150,000.00	106.7500	160,125.00	10,125.00
100,000.0000	CCO HOLDINGS LLC / CCO HOLDING 6.500% 04/30/2021 DD 05/10/11	105,698.60	106.5000	106,500.00	801.40
125,000.0000	CCO HOLDINGS LLC / CCO HOLDING 6.625% 01/31/2022 DD 01/26/12	125,260.52	107.5000	134,375.00	9,114.48
50,000.0000	CCO HOLDINGS LLC / CCO HOLDING 5.125% 02/15/2023 DD 12/17/12	50,000.00	100.8750	50,437.50	437.50
300,000.0000	CBS OUTDOOR AMERICAS CAPI 144A 5.625% 02/15/2024 DD 01/31/14	300,000.00	103.2500	309,750.00	9,750.00
125,000.0000	CDW LLC / CDW FINANCE CORP 8.500% 04/01/2019 DD 10/01/11	126,908.44	108.2500	135,312.50	8,404.06
200,000.0000	CGG SA 144A 6.875% 01/15/2022 DD 05/01/14	200,000.00	99.7500	199,500.00	500.00-
150,000.0000	CHS/COMMUNITY HEALTH SYSTEMS I 8.000% 11/15/2019 DD 05/15/12	158,196.16	109.5000	164,250.00	6,053.84
100,000.0000	CHS/COMMUNITY HEALTH SYSTEMS I 5.125% 08/15/2018 DD 08/17/12	103,714.06	104.8750	104,875.00	1,160.94
150,000.0000	CSC HOLDINGS LLC 144A 5.250% 06/01/2024 DD 05/23/14	150,000.00	98.3750	147,562.50	2,437.50-



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150,000.0000	CABLEVISION SYSTEMS CORP 7.750% 04/15/2018 DD 04/15/10	150,318.52	113.0000	169,500.00	19,181.48
80,000.0000	CALPINE CORP 144A 7.875% 07/31/2020 DD 07/23/10	83,000.86	108.5000	86,800.00	3,799.14
100,000.0000	CASCADES INC 7.875% 01/15/2020 DD 12/23/09	100,801.44	106.2500	106,250.00	5,448.56
125,000.0000	CATALENT PHARMA SOLUTIONS INC 7.875% 10/15/2018 DD 04/15/13	125,156.66	101.7500	127,187.50	2,030.84
150,000.0000	CENTRAL GARDEN AND PET CO 8.250% 03/01/2018 DD 03/08/10	151,817.90	103.7500	155,625.00	3,807.10
300,000.0000	CENTURYLINK INC 5.800% 03/15/2022 DD 03/12/12	305,533.92	104.1250	312,375.00	6,841.08
200,000.0000	CEQUEL COMMUNICATIONS HOL 144A 6.375% 09/15/2020 DD 10/25/12	205,015.19	106.2500	212,500.00	7,484.81
150,000.0000	CHEMTURA CORP 5.750% 07/15/2021 DD 07/23/13	151,054.23	103.7500	155,625.00	4,570.77
100,000.0000	CINCINNATI BELL INC 8.750% 03/15/2018 DD 03/15/10	100,646.25	104.8750	104,875.00	4,228.75
150,000.0000	FRONTIER COMMUNICATIONS CORP 7.125% 03/15/2019 DD 03/23/07	162,452.49	113.5000	170,250.00	7,797.51
125,000.0000	CLEAN HARBORS INC 5.250% 08/01/2020 DD 07/30/12	125,029.67	103.1250	128,906.25	3,876.58



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100,000.0000	CLEAN HARBORS INC 5.125% 06/01/2021 DD 12/07/12	100,162.29	102.1880	102,188.00	2,025.71
150,000.0000	CLEAR CHANNEL WORLDWIDE HOLDIN 7.625% 03/15/2020 DD 03/15/12	156,521.54	107.8750	161,812.50	5,290.96
100,000.0000	COMMSCOPE HOLDING CO INC 144A 6.625% 06/01/2020 DD 05/28/13	100,000.00	106.7500	106,750.00	6,750.00
84,000.0000	CIE GENERALE DE GEOPHYSIQUE - 7.750% 05/15/2017 DD 02/09/07	83,958.64	101.5000	85,260.00	1,301.36
200,000.0000	COVANTA HOLDING CORP 5.875% 03/01/2024 DD 03/06/14	204,972.82	103.3750	206,750.00	1,777.18
200,000.0000	CYRUSONE LP / CYRUSONE FINANCE 6.375% 11/15/2022 DD 05/15/13	201,273.63	107.7500	215,500.00	14,226.37
175,000.0000	DAVITA HEALTHCARE PARTNERS INC 6.625% 11/01/2020 DD 10/20/10	173,371.90	106.2500	185,937.50	12,565.60
125,000.0000	DAVITA HEALTHCARE PARTNERS INC 5.750% 08/15/2022 DD 08/28/12	127,773.91	106.8750	133,593.75	5,819.84
150,000.0000	DENBURY RESOURCES INC 4.625% 07/15/2023 DD 02/05/13	150,000.00	97.0210	145,531.50	4,468.50-
100,000.0000	DIAMONDBACK ENERGY INC 144A 7.625% 10/01/2021 DD 09/18/13	100,000.00	110.0000	110,000.00	10,000.00
225,000.0000	DISH DBS CORP 7.875% 09/01/2019 DD 08/17/09	227,107.35	118.7500	267,187.50	40,080.15



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75,000.0000	DISH DBS CORP 6.750% 06/01/2021 DD 05/05/11	77,417.04	114.0000	85,500.00	8,082.96
150,000.0000	DISH DBS CORP 5.000% 03/15/2023 DD 12/27/12	152,792.29	101.8750	152,812.50	20.21
150,000.0000	DOLE FOOD CO INC 144A 7.250% 05/01/2019 DD 11/01/13	150,704.02	101.2500	151,875.00	1,170.98
300,000.0000	RR DONNELLEY & SONS CO 7.000% 02/15/2022 DD 08/26/13	310,081.84	110.2500	330,750.00	20,668.16
200,000.0000	DUFYR FINANCE SCA 144A 5.500% 10/15/2020 DD 10/26/12	200,000.00	103.8310	207,662.00	7,662.00
150,000.0000	ENDO FINANCE LLC 144A 5.750% 01/15/2022 DD 12/19/13	150,000.00	102.0000	153,000.00	3,000.00
150,000.0000	ENDO FINANCE LLC & ENDO F 144A 7.000% 07/15/2019 DD 05/06/14	162,780.88	106.8750	160,312.50	2,468.38-
100,000.0000	ENERGY TRANSFER EQUITY 144A 5.875% 01/15/2024 DD 12/02/13	101,985.04	104.5000	104,500.00	2,514.96
200,000.0000	ENTEGRIS INC 144A 6.000% 04/01/2022 DD 04/01/14	200,000.00	103.0000	206,000.00	6,000.00
150,000.0000	EQUINIX INC 5.375% 04/01/2023 DD 03/05/13	151,176.64	102.2500	153,375.00	2,198.36
148,749.0000	EXGEN 2/14 HOLDCO TL 0.000% 02/05/2021 DD 01/22/14	148,045.73	101.3750	150,794.30	2,748.57



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175,000.0000	EXTERRAN HOLDINGS INC 7.250% 12/01/2018 DD 12/01/11	175,000.00	105.5000	184,625.00	9,625.00
225,000.0000	FMG RESOURCES AUGUST 2006 144A 8.250% 11/01/2019 DD 10/28/11	239,648.95	108.8750	244,968.75	5,319.80
150,000.0000	FTI CONSULTING INC 6.000% 11/15/2022 DD 05/15/13	150,000.00	102.8750	154,312.50	4,312.50
175,000.0000	FELCOR LODGING LP 5.625% 03/01/2023 DD 03/01/13	175,000.00	103.0000	180,250.00	5,250.00
175,000.0000	FIRST QUALITY FINANCE CO 144A 4.625% 05/15/2021 DD 05/14/13	175,000.00	94.5000	165,375.00	9,625.00-
100,000.0000	FRESENIUS MEDICAL CARE US 144A 5.875% 01/31/2022 DD 01/26/12	100,000.00	110.5000	110,500.00	10,500.00
150,000.0000	FRONTIER COMMUNICATIONS CORP 8.500% 04/15/2020 DD 04/12/10	155,208.52	118.0000	177,000.00	21,791.48
200,000.0000	GEO GROUP INC/THE 6.625% 02/15/2021 DD 08/15/11	200,000.00	107.2500	214,500.00	14,500.00
200,000.0000	GARDA WORLD SECURITY CORP 144A 7.250% 11/15/2021 DD 11/08/13	205,464.26	105.1250	210,250.00	4,785.74
150,000.0000	GATES GLOBAL LLC 144A 6.000% 07/15/2022 DD 06/26/14	150,000.00	100.0000	150,000.00	0.00
200,000.0000	GIBSON ENERGY INC 144A 6.750% 07/15/2021 DD 06/28/13	197,254.11	108.2500	216,500.00	19,245.89



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100,000.0000	GOODYEAR TIRE & RUBBER CO/THE 8.250% 08/15/2020 DD 08/13/10	108,887.20	109.7500	109,750.00	862.80
175,000.0000	GOODYEAR TIRE & RUBBER CO/THE 6.500% 03/01/2021 DD 02/25/13	176,040.15	108.5000	189,875.00	13,834.85
150,000.0000	GRAY TELEVISION INC 7.500% 10/01/2020 DD 10/09/12	157,537.61	107.7500	161,625.00	4,087.39
175,000.0000	GRIFFEY INTERMEDIATE INC 144A 7.000% 10/15/2020 DD 10/18/12	175,880.24	91.6250	160,343.75	15,536.49-
200,000.0000	GROUP 1 AUTOMOTIVE INC 5.000% 06/01/2022 DD 06/02/14	200,000.00	100.0000	200,000.00	0.00
125,000.0000	GULFMARK OFFSHORE INC 6.375% 03/15/2022 DD 09/15/12	125,735.82	104.0000	130,000.00	4,264.18
100,000.0000	HCA INC 6.375% 01/15/2015 DD 11/19/04	99,797.88	102.3750	102,375.00	2,577.12
100,000.0000	HCA HOLDINGS INC 7.750% 05/15/2021 DD 11/15/11	102,284.85	109.6250	109,625.00	7,340.15
100,000.0000	HCA INC 7.500% 02/15/2022 DD 08/01/11	100,000.00	115.3750	115,375.00	15,375.00
200,000.0000	HD SUPPLY INC 7.500% 07/15/2020 DD 10/15/13	214,011.69	109.2500	218,500.00	4,488.31
50,000.0000	HILLMAN GROUP INC 144A 6.375% 07/15/2022 DD 06/30/14	50,000.00	100.0000	50,000.00	0.00



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125,000.0000	HANESBRANDS INC 6.375% 12/15/2020 DD 11/09/10	125,444.08	108.1250	135,156.25	9,712.17
145,000.0000	HJ HEINZ CO 4.250% 10/15/2020 DD 04/15/14	145,000.00	100.6250	145,906.25	906.25
200,000.0000	HERTZ CORP/THE 7.500% 10/15/2018 DD 04/15/11	200,000.00	104.7500	209,500.00	9,500.00
100,000.0000	HERTZ CORP/THE 5.875% 10/15/2020 DD 10/16/12	100,000.00	104.5000	104,500.00	4,500.00
100,000.0000	HOLOGIC INC 6.250% 08/01/2020 DD 02/01/13	100,000.00	105.5000	105,500.00	5,500.00
125,000.0000	HUGHES SATELLITE SYSTEMS CORP 7.625% 06/15/2021 DD 12/15/11	127,989.76	114.5000	143,125.00	15,135.24
125,000.0000	HUGHES SATELLITE SYSTEMS CORP 6.500% 06/15/2019 DD 12/15/11	126,466.58	111.5000	139,375.00	12,908.42
140,000.0000	HUNTSMAN INTERNATIONAL LLC 8.625% 03/15/2021 DD 03/15/11	155,000.08	110.5000	154,700.00	300.08-
200,000.0000	INEOS GROUP HOLDINGS SA 144A 5.875% 02/15/2019 DD 02/18/14	204,952.56	102.5000	205,000.00	47.44
100,000.0000	INTELSAT LUXEMBORURG S A 7.750% 06/01/2021 DD 04/05/13	105,127.23	105.8750	105,875.00	747.77
100,000.0000	INTELSAT JACKSON HOLDINGS SA 7.250% 10/15/2020 DD 09/30/10	105,844.14	107.7500	107,750.00	1,905.86



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100,000.0000	INTELSAT JACKSON HOLDINGS SA 7.500% 04/01/2021 DD 10/01/11	101,869.08	109.5000	109,500.00	7,630.92
150,000.0000	IRON MOUNTAIN INC 6.000% 08/15/2023 DD 08/13/13	153,117.24	108.1250	162,187.50	9,070.26
125,000.0000	ISLE OF CAPRI CASINOS INC 7.750% 03/15/2019 DD 03/07/11	127,101.60	106.7500	133,437.50	6,335.90
300,000.0000	ISLE OF CAPRI CASINOS INC 8.875% 06/15/2020 DD 08/07/12	319,123.49	107.2500	321,750.00	2,626.51
150,000.0000	JARDEN CORP 7.500% 05/01/2017 DD 02/13/07	151,446.09	113.5000	170,250.00	18,803.91
150,000.0000	JO-ANN STORES HOLDINGS IN 144A 9.750% 10/15/2019 DD 10/16/12	156,243.38	102.2500	153,375.00	2,868.38-
137,000.0000	LEAR CORP 8.125% 03/15/2020 DD 03/26/10	138,597.05	107.6250	147,446.25	8,849.20
150,000.0000	LEAR CORP 5.375% 03/15/2024 DD 03/14/14	150,000.00	102.7500	154,125.00	4,125.00
200,000.0000	LEVEL 3 FINANCING INC 8.125% 07/01/2019 DD 01/01/12	214,109.86	109.1250	218,250.00	4,140.14
125,000.0000	LEVEL 3 FINANCING INC 7.000% 06/01/2020 DD 12/01/12	125,000.00	109.2500	136,562.50	11,562.50
100,000.0000	LEVEL 3 FINANCING INC 144A 6.125% 01/15/2021 DD 11/14/13	100,000.00	107.1250	107,125.00	7,125.00



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250,000.0000	LEVI STRAUSS & CO 7.625% 05/15/2020 DD 05/06/10	250,000.00	107.6250	269,062.50	19,062.50
175,000.0000	LINN ENERGY LLC / LINN ENERGY 7.750% 02/01/2021 DD 09/13/10	178,973.01	107.8750	188,781.25	9,808.24
325,000.0000	MDC PARTNERS INC 144A 6.750% 04/01/2020 DD 03/20/13	337,798.73	105.5000	342,875.00	5,076.27
75,000.0000	MGM RESORTS INTERNATIONAL 7.750% 03/15/2022 DD 03/22/12	75,000.00	117.2500	87,937.50	12,937.50
125,000.0000	MEDASSETS INC 8.000% 11/15/2018 DD 05/15/11	126,351.72	105.7500	132,187.50	5,835.78
150,000.0000	MEDIACOM BRDBND LLC/CORP 144A 5.500% 04/15/2021 DD 03/17/14	150,000.00	101.2500	151,875.00	1,875.00
100,000.0000	THE MEN'S WEARHOUSE INC 144A 7.000% 07/01/2022 DD 06/18/14	100,000.00	103.5000	103,500.00	3,500.00
150,000.0000	MIDCONTINENT COMMUNICATIO 144A 6.250% 08/01/2021 DD 07/30/13	150,000.00	103.5000	155,250.00	5,250.00
200,000.0000	MURRAY ENERGY CORP 144A 9.500% 12/05/2020 DD 05/08/14	222,999.06	111.7500	223,500.00	500.94
125,000.0000	NCR CORP 4.625% 02/15/2021 DD 02/15/13	125,328.75	100.7500	125,937.50	608.75
100,000.0000	NRG ENERGY INC 6.625% 03/15/2023 DD 03/15/13	100,000.00	108.2500	108,250.00	8,250.00



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250,000.0000	NRG ENERGY INC 144A 6.250% 05/01/2024 DD 04/21/14	250,000.00	104.5000	261,250.00	11,250.00
125,000.0000	NATIONSTAR MORTGAGE LLC / NATI 6.500% 07/01/2021 DD 02/07/13	121,834.18	100.2500	125,312.50	3,478.32
200,000.0000	NORTH ATLANTIC DRILLING L 144A 6.250% 02/01/2019 DD 01/31/14	200,000.00	98.7500	197,500.00	2,500.00-
100,000.0000	NORTHERN BLIZZARD RESOURC 144A 7.250% 02/01/2022 DD 01/29/14	100,000.00	103.0000	103,000.00	3,000.00
175,000.0000	NUANCE COMMUNICATIONS INC 144A 5.375% 08/15/2020 DD 08/14/12	182,345.12	103.5000	181,125.00	1,220.12-
100,000.0000	OASIS PETROLEUM INC 7.250% 02/01/2019 DD 08/01/11	101,135.36	106.0000	106,000.00	4,864.64
125,000.0000	OMEGA HEALTHCARE INVESTORS INC 6.750% 10/15/2022 DD 04/15/11	129,316.91	108.0700	135,087.50	5,770.59
125,000.0000	PQ CORP 144A 8.750% 05/01/2018 DD 11/08/12	131,613.82	108.6250	135,781.25	4,167.43
150,000.0000	PACIFIC DRILLING SA 144A 5.375% 06/01/2020 DD 06/03/13	150,000.00	98.0000	147,000.00	3,000.00-
100,000.0000	PAR PHARMACEUTICAL COS INC 7.375% 10/15/2020 DD 04/15/13	105,223.90	107.5000	107,500.00	2,276.10
125,000.0000	LIGHTSTREAM RESOURCES LTD 144A 8.625% 02/01/2020 DD 01/30/12	129,351.91	105.0000	131,250.00	1,898.09



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200,000.0000	PLY GEM INDUSTRIES INC 144A 6.500% 02/01/2022 DD 01/30/14	201,138.55	96.7500	193,500.00	7,638.55-
100,000.0000	POLYMER GROUP INC 144A 6.875% 06/01/2019 DD 06/11/14	100,497.13	101.6250	101,625.00	1,127.87
150,000.0000	PRECISION DRILLING CORP 6.500% 12/15/2021 DD 12/15/11	153,980.38	108.7500	163,125.00	9,144.62
150,000.0000	PRESTIGE BRANDS INC 8.125% 02/01/2020 DD 08/01/12	164,143.22	111.5000	167,250.00	3,106.78
200,000.0000	QUEBECOR MEDIA INC 5.750% 01/15/2023 DD 12/15/12	200,000.00	102.7500	205,500.00	5,500.00
175,000.0000	RHP HOTEL PROPERTIES LP / RHP 5.000% 04/15/2021 DD 10/15/13	175,000.00	99.7500	174,562.50	437.50-
300,000.0000	REGAL ENTERTAINMENT GRP 5.750% 03/15/2022 DD 03/11/14	303,277.43	103.7500	311,250.00	7,972.57
150,000.0000	RENAISSANCE ACQUISITION C 144A 6.875% 08/15/2021 DD 07/30/13	150,000.00	105.0000	157,500.00	7,500.00
375,000.0000	REYNOLDS GROUP ISSUER INC / RE STEP 05/15/2018 DD 05/15/12	378,694.19	104.6250	392,343.75	13,649.56
100,000.0000	REYNOLDS GROUP ISSUER INC / RE 9.875% 08/15/2019 DD 02/15/12	100,000.00	110.7500	110,750.00	10,750.00
175,000.0000	UNITED RENTALS NORTH AMERICA I 8.250% 02/01/2021 DD 01/19/11	179,794.43	111.2500	194,687.50	14,893.07



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175,000.0000	SBA COMMUNICATIONS CORP 5.625% 10/01/2019 DD 04/01/13	180,443.31	105.8750	185,281.25	4,837.94
150,000.0000	SESI LLC 6.375% 05/01/2019 DD 11/01/11	150,625.20	106.7500	160,125.00	9,499.80
200,000.0000	SAFWAY GROUP HOLDING LLC 144A 7.000% 05/15/2018 DD 05/14/13	202,812.38	106.0000	212,000.00	9,187.62
150,000.0000	SALLY HOLDINGS LLC / SALLY CAP 5.750% 06/01/2022 DD 05/18/12	150,000.00	106.5000	159,750.00	9,750.00
200,000.0000	SEADRILL LTD 144A VAR RT 09/15/2017 DD 09/14/12	200,000.00	105.2500	210,500.00	10,500.00
100,000.0000	SERVICE CORP INTERNATIONAL/US 7.625% 10/01/2018 DD 10/03/06	101,138.58	117.2500	117,250.00	16,111.42
150,000.0000	SERVICE CORP INTL 144A 5.375% 05/15/2024 DD 05/12/14	150,000.00	102.2500	153,375.00	3,375.00
125,000.0000	SIGNODE INDUSTRIAL GROUP 144A 6.375% 05/01/2022 DD 04/29/14	125,000.00	101.2500	126,562.50	1,562.50
325,000.0000	SINCLAIR TELEVISION GROUP INC 6.125% 10/01/2022 DD 04/01/13	328,697.50	104.5000	339,625.00	10,927.50
250,000.0000	SIRIUS XM RADIO INC 144A 6.000% 07/15/2024 DD 05/06/14	250,000.00	104.0000	260,000.00	10,000.00
125,000.0000	SONIC AUTOMOTIVE INC 5.000% 05/15/2023 DD 05/09/13	126,243.76	98.2500	122,812.50	3,431.26-



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100,000.0000	SPECTRUM BRANDS INC 6.625% 11/15/2022 DD 11/15/13	100,000.00	108.2500	108,250.00	8,250.00
100,000.0000	SPRINT NEXTEL CORP 144A 7.000% 03/01/2020 DD 03/01/12	100,000.00	115.0000	115,000.00	15,000.00
100,000.0000	SPRINT NEXTEL CORP 7.000% 08/15/2020 DD 08/14/12	100,000.00	110.6250	110,625.00	10,625.00
100,000.0000	SPRINT NEXTEL CORP 6.000% 11/15/2022 DD 11/14/12	100,000.00	102.0000	102,000.00	2,000.00
150,000.0000	SPRINT CORP 144A 7.875% 09/15/2023 DD 09/11/13	150,000.00	111.2500	166,875.00	16,875.00
125,000.0000	SPRINT CORP 144A 7.125% 06/15/2024 DD 12/12/13	132,839.83	106.0000	132,500.00	339.83-
150,000.0000	SUBURBAN PROPANE PARTNRS 5.500% 06/01/2024 DD 05/27/14	151,495.21	101.2500	151,875.00	379.79
300,000.0000	SUNGARD DATA SYSTEMS INC 7.625% 11/15/2020 DD 11/16/10	307,153.30	109.0000	327,000.00	19,846.70
150,000.0000	TENET HEALTHCARE CORP 6.000% 10/01/2020 DD 09/27/13	150,000.00	108.5000	162,750.00	12,750.00
300,000.0000	T-MOBILE USA INC 6.633% 04/28/2021 DD 07/28/13	300,000.00	108.2500	324,750.00	24,750.00
200,000.0000	TW TELECOM HOLDINGS INC 5.375% 10/01/2022 DD 10/02/12	201,944.41	109.3750	218,750.00	16,805.59



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150,000.0000	TW TELECOM HOLDINGS INC 6.375% 09/01/2023 DD 08/26/13	160,284.26	113.7500	170,625.00	10,340.74
149,250.0000	ALLFLEX 7/13 TL	149,250.00	100.0210	149,281.34	31.34
150,000.0000	TELESAT CANADA / TELESAT 144A 6.000% 05/15/2017 DD 05/14/12	155,331.81	103.1250	154,687.50	644.31-
250,000.0000	TENET HEALTHCARE CORP 8.000% 08/01/2020 DD 08/17/10	255,043.39	108.3750	270,937.50	15,894.11
125,000.0000	TEREX CORP 6.000% 05/15/2021 DD 11/26/12	125,000.00	107.7500	134,687.50	9,687.50
200,000.0000	TOWNSQUARE RADIO LLC / TO 144A 9.000% 04/01/2019 DD 04/04/12	211,558.33	110.7500	221,500.00	9,941.67
200,000.0000	TRANSDIGM INC 7.500% 07/15/2021 DD 07/01/13	200,000.00	110.7500	221,500.00	21,500.00
150,000.0000	TRANSDIGM INC 144A 6.500% 07/15/2024 DD 06/04/14	150,000.00	104.1250	156,187.50	6,187.50
125,000.0000	TRINIDAD DRILLING LTD 144A 7.875% 01/15/2019 DD 12/16/10	132,055.13	105.7500	132,187.50	132.37
200,000.0000	TRINSEO OP / TRINSEO FIN 8.750% 02/01/2019 DD 02/01/14	209,090.57	107.7500	215,500.00	6,409.43
150,000.0000	TRONOX FINANCE LLC 6.375% 08/15/2020 DD 08/15/13	151,489.77	103.2500	154,875.00	3,385.23
300,000.0000	UPCB FINANCE VI LTD 144A 6.875% 01/15/2022 DD 02/07/12	300,000.00	109.2500	327,750.00	27,750.00



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100,000.0000	USG CORP 144A 5.875% 11/01/2021 DD 10/31/13	100,000.00	106.0000	106,000.00	6,000.00
150,000.0000	UNIT CORP 6.625% 05/15/2021 DD 05/18/11	148,446.92	106.7500	160,125.00	11,678.08
125,000.0000	UNITED RENTALS NORTH AMERICA I 7.375% 05/15/2020 DD 11/15/12	127,080.80	110.5000	138,125.00	11,044.20
67,000.0000	UNIVISION COMMUNICATIONS 144A 6.750% 09/15/2022 DD 08/29/12	72,665.84	110.6250	74,118.75	1,452.91
200,000.0000	VALEANT PHARMACEUTICALS I 144A 6.750% 10/01/2017 DD 09/28/10	193,720.59	104.2500	208,500.00	14,779.41
200,000.0000	VIASAT INC 6.875% 06/15/2020 DD 06/15/12	201,695.50	107.7500	215,500.00	13,804.50
101,000.0000	VIRGIN MEDIA FINANCE PLC 8.375% 10/15/2019 DD 11/09/09	100,738.78	105.7500	106,807.50	6,068.72
175,000.0000	VP II ESCROW CORP 144A 7.500% 07/15/2021 DD 07/12/13	175,000.00	110.7500	193,812.50	18,812.50
250,000.0000	WMG ACQUISITION CORP 144A 5.625% 04/15/2022 DD 04/09/14	250,185.34	100.6250	251,562.50	1,377.16
150,000.0000	WMG ACQUISITION CORP 144A 6.750% 04/15/2022 DD 04/09/14	150,733.58	100.0000	150,000.00	733.58-
175,000.0000	WEST CORP 8.625% 10/01/2018 DD 07/15/11	181,101.03	106.2500	185,937.50	4,836.47



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150,000.0000	WEST CORP 5.375% 07/15/2022 DD 07/01/14	150,000.00	99.0000	148,500.00	1,500.00-
300,000.0000	WIDEOPENWEST FINANCE LLC / WID 10.250% 07/15/2019 DD 01/15/13	321,594.81	112.3750	337,125.00	15,530.19
200,000.0000	WIND ACQUISITION FIN SA 144A 4.750% 07/15/2020 DD 07/10/14	200,000.00	100.7500	201,500.00	1,500.00
325,000.0000	WINDSTREAM CORP 7.750% 10/15/2020 DD 10/06/10	336,914.47	108.3750	352,218.75	15,304.28
150,000.0000	MALLINCKRODT 4/14 BRIDGE	150,000.00	100.0000	150,000.00	0.00
300,000.0000	AMERICAN ENERGY BRIDGE LOAN A	300,000.00	100.0000	300,000.00	0.00
TOTAL INVESTMENTS FIXED INCOME SECURITIES		31,275,072.42		32,504,016.39	1,228,943.97
TOTAL INVESTMENT		32,605,817.06		33,834,761.03	1,228,943.97



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<u>INVESTMENTS CASH EQUIVALENTS</u>					
0.0700	FIDELITY INSTL MM PRIME 690	0.07	100.0000	0.07	0.00
TOTAL INVESTMENTS CASH EQUIVALENTS		0.07		0.07	0.00
TOTAL INVESTMENT		0.07		0.07	0.00



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<u>INVESTMENTS CASH EQUIVALENTS</u>					
0.0700	FIDELITY INSTL MM PRIME 690	0.07	100.0000	0.07	0.00
TOTAL INVESTMENTS CASH EQUIVALENTS		0.07		0.07	0.00
TOTAL INVESTMENT		0.07		0.07	0.00



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<u>SHARES/ PAR VALUE</u>	<u>SECURITY DESCRIPTION</u>	<u>COST</u>	<u>PRICE</u>	<u>MARKET VALUE</u>	<u>UNREALIZED GAIN/LOSS</u>
<u>INVESTMENTS CASH EQUIVALENTS</u>					
0.0700	FIDELITY INSTL MM PRIME 690	0.07	100.0000	0.07	0.00
TOTAL INVESTMENTS CASH EQUIVALENTS		0.07		0.07	0.00
<u>INVESTMENTS EQUITY</u>					
538,623.0470	PARAMETRIC TAX-MANAGED EMERGIN	25,345,333.62	52.4200	28,234,620.12	2,889,286.50
TOTAL INVESTMENTS EQUITY		25,345,333.62		28,234,620.12	2,889,286.50
TOTAL INVESTMENT		25,345,333.69		28,234,620.19	2,889,286.50



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<u>INVESTMENTS CASH EQUIVALENTS</u>					
207.7000	AUD (AUSTRALIAN DOLLARS)	194.30	0.0000	196.04	1.74 C
50.9800	NZD (NEW ZEALAND DOLLAR)	44.16	0.0000	44.64	0.48 C
242.0700	CHF (SWISS FRANC)	271.73	0.0000	272.97	1.24 C
8,479.6600	GBP (GREAT BRITISH POUNDS)	14,428.99	0.0000	14,498.95	69.96 C
33,135.5200	HKD (HONG KONG DOLLARS)	4,274.66	0.0000	4,275.36	0.70 C
7,065,455.0000	JPY (JAPANESE YEN)	69,510.02	0.0000	69,744.39	234.37 C
3,525.0000	SGD (SINGAPORE DOLLARS)	2,819.32	0.0000	2,827.58	8.26 C
1,186.3800	ILS (ISRAELI SHEKEL)	342.99	0.0000	346.01	3.02 C
56.2700	DKK (DANISH KRONE)	10.29	0.0000	10.33	0.04 C
11,049.5600	NOK (NORWEGIAN KRONE)	1,803.79	0.0000	1,800.69	3.10-C
5,195.6300	SEK (SWEDISH KRONA)	778.17	0.0000	777.17	1.00-C
20,812.7300	EUR (EURO)	28,337.97	0.0000	28,495.75	157.78 C
53,722.1800	FIDELITY INSTL MM PRIME 690	53,722.18	100.0000	53,722.18	0.00
TOTAL INVESTMENTS CASH EQUIVALENTS		176,538.57		177,012.06	473.49 473.49 C 0.00 I



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<u>INVESTMENTS PREFERRED SECURITIES</u>					
510.0000	FUCHS PETROLUB SE	19,797.45	45.2093	23,056.76	3,259.31 1,007.04 C 2,252.27 I
220.0000	RWE AG PFD	18,253.88	33.2703	7,319.48	10,934.40- 82.33 C 11,016.73- I
765.0000	HENKEL AG & CO KGAA PFD	42,118.95	115.5973	88,431.96	46,313.01 994.68 C 45,318.33 I
841.0000	VOLKSWAGEN AG PFD	126,558.31	262.6029	220,849.10	94,290.79 2,725.96 C 91,564.83 I
250.0000	BAYERISCHE MOTOREN WERKE-PRF PFD	9,010.33	95.8541	23,963.55	14,953.22 269.54 C 14,683.68 I
662.0000	PORSCHE AUTOMOBIL HOLDING SE PFD	40,039.87	104.1786	68,966.25	28,926.38 1,201.25- C 30,127.63 I
1,065,970.0000	ROLLS-ROYCE HOLDINGS C SHS ENTITLEMENT (JULY 2014)	1,788.48	0.0017	1,822.65	34.17 C



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TOTAL INVESTMENTS PREFERRED SECURITIES		257,567.27		434,409.75	176,842.48 3,912.47 C 172,930.01 I
<u>INVESTMENTS EQUITY</u>					
1,211.0000	RECALL HOLDINGS LTD	4,596.47	4.5116	5,463.55	867.08 171.92 C 695.16 I
5,953.0000	ORORA LTD	6,134.48	1.3449	8,006.71	1,872.23 470.81 C 1,401.42 I
28,816.0000	SCENTRE GROUP	86,863.43	3.0203	87,033.54	170.11 442.60 C 272.49- I
10,696.0000	WESTFIELD CORP NPV STAPLED UNITS	115,458.37	6.7485	72,182.25	43,276.12- 996.30 C 44,272.42- I
7,964.0000	TATTS GROUP LTD	17,976.43	3.0863	24,580.01	6,603.58 598.97 C 6,004.61 I
1,925.0000	AGL ENERGY NPV	26,726.98	14.6107	28,125.79	1,398.81 685.38 C 713.43 I
6,029.0000	GOODMAN LTD (STAPLED UNITS)	18,191.25	4.7664	28,736.88	10,545.63 700.27 C 9,845.36 I



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24,340.0000	DEXUS PROPERTY GROUP NPV (STAPLED)	18,164.01	1.0476	25,500.37	7,336.36
					621.39 C 6,714.97 I
4,665.0000	METCASH LIMITED NPV	18,008.26	2.4917	11,624.08	6,384.18- 283.26 C 6,667.44- I
2,406.0000	SEEK LIMITED NPV	29,344.46	14.9600	35,993.81	6,649.35 495.77- C 7,145.12 I
6,058.0000	BRAMBLES LTD NPV	41,022.54	8.6739	52,546.98	11,524.44 1,280.48 C 10,243.96 I
3,975.0000	ASCIANO LTD	20,435.12	5.3138	21,122.66	687.54 514.73 C 172.81 I
1,346.0000	MACQUARIE GROUP LIMITED NPV	61,935.98	56.2817	75,755.27	13,819.29 1,846.03 C 11,973.26 I
2,383.0000	CROWN RESORTS LTD	17,783.41	14.2710	34,007.82	16,224.41 828.71 C 15,395.70 I
2,823.0000	ECHO ENTERTAINMENT GROUP LTD	13,169.13	2.9636	8,366.49	4,802.64- 1,139.50- C 3,663.14- I



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1,545.0000	DULUXGROUP LTD	3,376.02	5.3421	8,253.69	4,877.67 610.38 C 4,267.29 I
215.0000	DART ENERGY LTD	18.13	0.1698	36.53	18.40 0.27 C 18.13 I
2,741.0000	JAMES HARDIE INDUSTRIES PLC	18,081.23	13.0628	35,805.37	17,724.14 872.52 C 16,851.62 I
2,759.0000	TREASURY WINE ESTATES LTD	9,582.71	4.7286	13,046.45	3,463.74 1,906.13- C 5,369.87 I
1,065.0000	SHOPPING CENTRES AUSTRALASIA	1,564.33	1.6234	1,728.94	164.61 185.75- C 350.36 I
3,093.0000	ALS LTD	30,557.69	8.3625	25,865.25	4,692.44- 356.25- C 4,336.19- I
12,410.0000	AURIZON HOLDINGS LTD	41,530.92	4.7003	58,331.63	16,800.71 5,216.06- C 22,016.77 I
11,557.0000	FEDERATION CENTRES	23,567.17	2.3501	27,161.11	3,593.94 2,238.84- C 5,832.78 I
806.0000	RAMSAY HEALTH CARE LTD AUD0.10	30,447.59	42.9451	34,613.81	4,166.22 476.74- C 4,642.96 I



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13,050.0000	AUSTRALIA & NEW ZEALAND BANK GROUP NPV	312,557.39	31.4679	410,656.86	98,099.47
					5,388.69 C 92,710.78 I
5,953.0000	AMCOR LIMITED NPV	49,810.08	9.8443	58,603.45	8,793.37
					1,656.13- C 10,449.50 I
15,022.0000	WESTPAC BANKING CORP NPV	395,839.78	31.9776	480,368.08	84,528.30
					4,140.20 C 80,388.10 I
5,310.0000	FORTESCUE METALS G NPV	24,314.04	4.1057	21,801.52	2,512.52-
					531.26 C 3,043.78- I
24,032.0000	TELSTRA CORP NPV	76,123.52	4.9174	118,176.36	42,052.84
					2,014.09- C 44,066.93 I
1,982.0000	BENDIGO & ADELAIDE BK LTD NPV	18,351.67	11.5149	22,822.67	4,471.00
					556.15 C 3,914.85 I
2,408.0000	COCA-COLA AMATIL NPV	24,736.45	8.9288	21,500.60	3,235.85-
					523.93 C 3,759.78- I
739.0000	ASX LTD NPV	23,073.95	33.6388	24,859.08	1,785.13
					605.77 C 1,179.36 I



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15,325.0000	BHP BILLITON LIMITED	614,889.27	33.8842	519,275.59	95,613.68- 11,160.03 C 106,773.71- I
13,063.0000	MIRVAC GROUP STAPLED SHS	17,571.21	1.6847	22,008.18	4,436.97 536.31 C 3,900.66 I
1,908.0000	COMPUTERSHARE NPV (DFD 1 POST REC)	22,201.78	11.7792	22,474.81	273.03 547.67 C 274.64- I
2,417.0000	CSL ORD NPV	80,610.43	62.8132	151,819.55	71,209.12 3,699.58 C 67,509.54 I
818.0000	REA GROUP LTD	29,597.06	40.3118	32,975.08	3,378.02 1,037.62 C 2,340.40 I
9,382.0000	TRANSURBAN GROUP NPV	53,132.17	6.9750	65,439.93	12,307.76 213.33 C 12,094.43 I
269.0000	COCHLEAR LTD COM	17,957.95	58.2355	15,665.36	2,292.59- 381.73 C 2,674.32- I
5,939.0000	ORIGIN ENERGY LTD NPV (POST RECONSTRUCTION)	88,151.35	13.7990	81,952.78	6,198.57- 946.50 C 7,145.07- I



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8,069.0000	COMMONWEALTH BANK OF AUSTRALIA ORD NPV	436,456.38	76.3385	615,976.07	179,519.69
					5,073.46 C 174,446.23 I
4,132.0000	BORAL LIMITED NEW NPV	17,833.13	4.9552	20,474.94	2,641.81
					498.96 C 2,142.85 I
1,870.0000	RIO TINTO LIMITED NPV	137,138.90	55.9797	104,682.12	32,456.78-
					2,550.93 C 35,007.71- I
3,911.0000	CSR ORD NPV	13,799.87	3.2940	12,882.98	916.89-
					723.65 C 1,640.54- I
3,600.0000	APA GROUP NPV	23,090.53	6.5031	23,411.26	320.73
					2,785.48- C 3,106.21 I
8,920.0000	INSURANCE AUSTRALIA GROUP PLC	32,214.91	5.5120	49,167.79	16,952.88
					1,198.13 C 15,754.75 I
10,341.0000	CFS RETAIL PROPERTY TRUST GROUP	17,815.99	1.9254	19,911.12	2,095.13
					485.21 C 1,609.92 I
7,961.0000	GPT GROUP	21,453.57	3.6243	28,853.72	7,400.15
					703.11 C 6,697.04 I



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1,667.0000	OZ MINERALS LTD AUD0.4	16,164.92	3.8603	6,435.20	9,729.72- 259.46 C 9,989.18- I
1,545.0000	ORICA LIMITED	38,290.13	18.3861	28,406.68	9,883.45- 692.22 C 10,575.67- I
400.0000	LEIGHTON HOLDINGS LTD ORD A\$0.50	14,420.35	18.6221	7,448.86	6,971.49- 181.51 C 7,153.00- I
2,232.0000	LEND LEASE GROUP NPV	17,849.25	12.3738	27,618.49	9,769.24 673.02 C 9,096.22 I
769.0000	WORLEYPARSONS LTD NPV	18,130.20	16.4324	12,636.54	5,493.66- 307.93 C 5,801.59- I
5,453.0000	SUNCORP GROUP LIMITED	43,507.02	12.7797	69,687.86	26,180.84 1,698.17 C 24,482.67 I
11,694.0000	NATL AUSTRALIA BK NPV	314,226.38	30.9394	361,805.38	47,579.00 5,981.75 C 41,597.25 I
6,144.0000	NEWCREST MINING LTD ORD NPV	137,125.22	9.9293	61,005.63	76,119.59- 436.52 C 76,556.11- I



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6,918.0000	INCITEC PIVOT NPV	22,180.22	2.7371	18,935.71	3,244.51- 461.43 C 3,705.94- I
2,850.0000	TOLL HLDGS LIMITED NPV	19,509.21	4.8136	13,718.86	5,790.35- 334.31 C 6,124.66- I
12,025.0000	AMP LIMITED AUS0.40	65,610.75	5.0024	60,153.92	5,456.83- 2,497.81 C 7,954.64- I
6,827.0000	QANTAS AIRWAYS NPV	17,862.99	1.1892	8,119.02	9,743.97- 197.85 C 9,941.82- I
6,582.0000	QBE INS GROUP A\$1	115,320.96	10.2596	67,529.01	47,791.95- 988.49 C 48,780.44- I
3,568.0000	SANTOS LIMITED NPV	48,486.72	13.4593	48,022.79	463.93- 1,170.24 C 1,634.17- I
1,583.0000	SONIC HEALTHCARE LTD ORD A\$0.20	21,001.46	16.3569	25,893.01	4,891.55 630.97 C 4,260.58 I
10,223.0000	STOCKLAND TRUST GROUP NPV (STAPLED)	37,109.12	3.6621	37,438.04	328.92 912.30 C 583.38- I



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4,996.0000	WESFARMERS ORD NPV	153,669.72	39.4906	197,295.46	43,625.74 3,345.50 C 40,280.24 I
11,358.0000	ALUMINA LTD NPV	18,469.39	1.2741	14,472.34	3,997.05- 352.67 C 4,349.72- I
1,880.0000	ILUKA RESOURCES LIMITED	28,553.13	7.6735	14,426.18	14,126.95- 1,708.79- C 12,418.16- I
3,264.0000	WOODSIDE PETROLEUM NPV	132,234.36	38.7639	126,525.43	5,708.93- 183.05 C 5,891.98- I
6,229.0000	WOOLWORTHS LIMITED ORD A\$0.25	171,984.49	33.2423	207,066.89	35,082.40 98.27- C 35,180.67 I
8,029.0000	AUCKLAND INTERNATIONAL AIRPORT LTD	22,878.09	3.4146	27,416.18	4,538.09 2,176.25 C 2,361.84 I
2,348.0000	CHORUS LTD	4,187.12	1.5190	3,566.80	620.32- 687.04 C 1,307.36- I
5,614.0000	CONTACT ENERGY NPV	24,553.27	4.6491	26,100.44	1,547.17 3,551.58 C 2,004.41- I



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4,126.0000	FLETCHER BUILDING NPV	20,022.69	7.7135	31,826.30	11,803.61 3,204.27 C 8,599.34 I
11,740.0000	TELECOM CORP OF NEW ZEALAND NPV	13,747.69	2.3464	27,547.60	13,799.91 5,306.28 C 8,493.63 I
251.0000	BUWOG AG	4,594.27	19.3187	4,849.00	254.73 54.18- C 308.91 I
379.0000	RAIFFEISEN BANK INTERNATIONAL HOLDING AG	18,192.35	31.9217	12,098.34	6,094.01- 136.07 C 6,230.08- I
341.0000	ANDRITZ AG NPV (POST SPLIT)	20,089.55	57.7849	19,704.68	384.87- 1,077.24 C 1,462.11- I
3,352.0000	IMMOEAST AG NPV(EXCHANGE RATE SH0	0.00	0.0000	0.00	0.00
1,331.0000	TELEKOM AUSTRIA (TA) NPV	18,730.48	9.7757	13,011.50	5,718.98- 146.36 C 5,865.34- I
644.0000	OMV AG NPV	24,867.88	45.1819	29,097.18	4,229.30 327.28 C 3,902.02 I



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462.0000	VERBUND AG	18,490.78	19.3666	8,947.38	9,543.40- 100.64 C 9,644.04- I
505.0000	VOESTALPINE AG	20,519.57	47.5848	24,030.34	3,510.77 270.30 C 3,240.47 I
810.0000	ERSTE GROUP BANK AG	34,349.76	32.3393	26,194.85	8,154.91- 294.63 C 8,449.54- I
5,028.0000	IMMOFINANZ AG NPV	16,350.32	3.5324	17,760.94	1,410.62 145.66 C 1,264.96 I
550.0000	TELENET GROUP HOLDING NPV	30,343.26	56.9840	31,341.21	997.95 215.17- C 1,213.12 I
652.0000	BELGACOM NPV	25,627.17	33.1813	21,634.24	3,992.93- 243.33 C 4,236.26- I
958.0000	AGEAS NV	32,874.83	39.8901	38,214.80	5,339.97 451.06 C 4,888.91 I
521.0000	UMICORE NPV	18,950.42	46.4552	24,203.19	5,252.77 272.23 C 4,980.54 I
433.0000	DELHAIZE GROUP	35,610.27	67.6497	29,292.32	6,317.95- 329.48 C 6,647.43- I



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1,253.0000	KBC GROUPE NPV	64,308.75	54.4237	68,192.91	3,884.16 203.40 C 3,680.76 I
3,900.0000	ANHEUSER-BUSCH INBEV NV	227,048.83	114.8716	447,999.57	220,950.74 6,326.71 C 214,624.03 I
255.0000	SOLVAY NPV	26,625.26	172.1021	43,886.05	17,260.79 493.62 C 16,767.17 I
433.0000	UCB S A NPV	18,802.13	84.6545	36,655.42	17,853.29 412.29 C 17,441.00 I
375.0000	COLRUYT SA NPV	18,477.76	50.7954	19,048.30	570.54 214.26 C 356.28 I
346.0000	GROUPE BRUXELLES L NPV	30,845.34	103.9047	35,951.06	5,105.72 404.38 C 4,701.34 I
622.0000	PROSIEBENSAT1 MEDI	29,640.00	44.5452	27,707.17	1,932.83- 190.23- C 1,742.60- I
1,907.0000	DEUTSCHE WOHNEN AG NPV (BR)	37,687.83	21.5641	41,122.76	3,434.93 240.28- C 3,675.21 I
558.0000	LANXESS AG NPV	40,347.52	67.4922	37,660.68	2,686.84- 2,875.46 C 5,562.30- I



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3,364.0000	SKY DEUTSCHLAND AG	30,011.75	9.2116	30,987.96	976.21 63.37- C 1,039.58 I
122.0000	WACKER CHEMIE AG NPV (BR)	18,506.89	115.4604	14,086.17	4,420.72- 158.44 C 4,579.16- I
169.0000	BRENNTAG AG	19,442.18	178.6740	30,195.92	10,753.74 1,355.24- C 12,108.98 I
740.0000	K + S AG SHS	44,425.88	32.8801	24,331.30	20,094.58- 273.67 C 20,368.25- I
214.0000	HUGO BOSS AG	24,124.78	149.4427	31,980.74	7,855.96 1,448.21 C 6,407.75 I
4,602.0000	COMMERZBANK AG	93,291.92	15.7178	72,333.51	20,958.41- 1,589.19- C 19,369.22- I
360.0000	OSRAM LICHT AG	10,637.24	50.4326	18,155.75	7,518.51 203.02 C 7,315.49 I
898.0000	ADIDAS AG	48,821.28	101.2760	90,945.87	42,124.59 1,022.96 C 41,101.63 I
606.0000	FRESENIUS SE & CO KGAA	45,819.25	149.1004	90,354.86	44,535.61 1,016.30 C 43,519.31 I



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1,176.0000	UNITED INTERNET AG NPV REGD	18,245.59	44.0524	51,805.62	33,560.03 582.72 C 32,977.31 I
362.0000	HANNOVER RUECKVERSICHERUNG SE	18,317.70	90.1037	32,617.56	14,299.86 366.88 C 13,932.98 I
787.0000	GEA GROUP AG NPV	18,771.10	47.3452	37,260.68	18,489.58 419.10 C 18,070.48 I
497.0000	CONTINENTAL AG NPV	51,092.45	231.5917	115,101.09	64,008.64 5,647.33 C 58,361.31 I
4,479.0000	DEUTSCHE POST AG NPV (REGD)	94,564.69	36.1592	161,957.29	67,392.60 916.62 C 66,475.98 I
552.0000	MERCK KGAA NPV	27,434.01	86.7904	47,908.31	20,474.30 1,387.58- C 21,861.88 I
2,278.0000	RWE AG (NEU) NPV 'A '	180,919.35	42.9433	97,825.04	83,094.31- 1,578.41 C 84,672.72- I
4,615.0000	SAP SE ORD NPV	250,917.60	77.2200	356,370.58	105,452.98 3,574.91 C 101,878.07 I
8,999.0000	E.ON SE NPV	305,830.86	20.6467	185,800.39	120,030.47- 1,762.39 C 121,792.86- I



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621.0000	HENKEL AG & CO KGAA NPV(BR)	44,577.94	100.6325	62,492.80	17,914.86 71.91- C 17,986.77 I
487.0000	METRO AG ORD NPV	29,490.98	43.5800	21,223.48	8,267.50- 238.72 C 8,506.22- I
4,019.0000	BAYER AG ORD NPV	295,291.74	141.2278	567,594.62	272,302.88 6,905.69 C 265,397.19 I
4,234.0000	BASF SE	281,464.05	116.4188	492,917.30	211,453.25 4,589.56 C 206,863.69 I
571.0000	CELESIO AG	18,483.72	35.5979	20,326.40	1,842.68 228.63 C 1,614.05 I
379.0000	BEIERSDORF AG NPV	22,819.99	96.7578	36,671.22	13,851.23 412.47 C 13,438.76 I
215.0000	HOCHTIEF AG NPV	18,569.95	86.5439	18,606.95	37.00 209.28 C 172.28- I
604.0000	HEIDELBERGCEMENT AG	34,440.91	85.3391	51,544.83	17,103.92 579.76 C 16,524.16 I
1,271.0000	FRESENIUS MEDICAL CARE AG & CO KGAA	76,802.94	67.2115	85,425.91	8,622.97 355.70 C 8,267.27 I



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2,123.0000	ALLIANZ SE (SOCIETAS EUROPEAE)	277,748.22	166.6255	353,746.05	75,997.83 3,303.91 C 72,693.92 I
1,076.0000	DEUTSCHE LUFTHANSA AG ORD NPV REGD VINK	18,435.65	21.4682	23,099.86	4,664.21 259.83 C 4,404.38 I
847.0000	MUENCHENER RUECKVERSICHERUNGS G NPV REGD	139,614.18	221.6653	187,750.58	48,136.40 2,111.80 C 46,024.60 I
197.0000	SALZGITTER AG ORD NPV	18,432.07	42.0876	8,291.27	10,140.80- 93.26 C 10,234.06- I
190.0000	VOLKSWAGEN AG ORD NPV	18,425.63	258.4955	49,114.15	30,688.52 552.40 C 30,136.12 I
4,571.0000	DAIMLER AG ORD NPV (REGD)	245,730.08	93.6498	428,073.51	182,343.43 2,807.84 C 179,535.59 I
327.0000	MAN SE ORD NPV	27,614.67	123.5657	40,406.01	12,791.34 454.46 C 12,336.88 I
1,466.0000	THYSSENKRUPP AG NPV	51,367.21	29.1492	42,732.73	8,634.48- 480.64 C 9,115.12- I



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3,841.0000	SIEMENS AG NPV REGD	396,165.22	132.0545	507,221.40	111,056.18 4,916.65 C 106,139.53 I
992.0000	QIAGEN NV	23,116.49	24.2339	24,040.08	923.59 270.39 C 653.20 I
921.0000	LINDE AG NPV	128,515.00	212.6289	195,831.30	67,316.30 2,310.34 C 65,005.96 I
6,523.0000	DEUTSCHE BANK AG ORD NPV REGD	368,660.58	35.1803	229,481.16	139,179.42- 1,790.66 C 140,970.08- I
1,670.0000	BAYERISCHE MOTOREN WERKE (BMW) AG EUR1	97,211.59	126.8106	211,773.82	114,562.23 1,534.19 C 113,028.04 I
691.0000	SUEDZUCKER AG NPV	20,062.80	20.1949	13,954.72	6,108.08- 178.36 C 6,286.44- I
14,582.0000	DEUTSCHE TELEKOM AG NPV (REGD)	206,590.11	17.5251	255,551.30	48,961.19 2,198.90 C 46,762.29 I
4,663.0000	INFINEON TECHNOLOGIES ORD NPV	32,588.98	12.4989	58,282.70	25,693.72 655.54 C 25,038.18 I



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836.0000	DEUTSCHE BOERSE AG NPV	63,001.23	77.6034	64,876.46	1,875.23 729.71 C 1,145.52 I
340.0000	FRAPORT AG NPV	18,116.28	70.6481	24,020.37	5,904.09 270.17 C 5,633.92 I
10,319.0000	BANCO POPULAR ESPANOL SA	72,911.54	6.6814	68,945.90	3,965.64- 423.50 C 4,389.14- I
984.0000	ACERINOX SA EUR0.25 (STK DIV 08-JUL-2014)	602.05	0.6065	596.83	5.22- 4.15 C 9.37- I
1,345.0000	GAMESA CORP TECNO EUR0.17	18,358.70	12.4852	16,792.71	1,565.99- 188.88 C 1,754.87- I
607.0000	ACS ACTIVIDADES CO EUR0.5	28,857.01	45.7296	27,757.87	1,099.14- 312.21 C 1,411.35- I
1,195.0000	GRIFOLS SA EUR0.5	16,018.71	54.6496	65,306.31	49,287.60 734.60 C 48,553.00 I
984.0000	ACERINOX SA EUR0.25	19,033.60	17.7168	17,433.33	1,600.27- 199.37 C 1,799.64- I



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1,888.0000	FERROVIAL SA EUR0.2	18,754.19	22.2692	42,044.30	23,290.11 472.91 C 22,817.20 I
12,206.0000	MAPFRE SA EUR0.10	48,301.68	3.9855	48,648.19	346.51 77.08- C 423.59 I
15,764.0000	BANCO DE SABADELL SA NEW EUR0.125 (POST SPLIT 20)	50,027.59	3.4119	53,785.54	3,757.95 53.31 C 3,704.64 I
8,524.0000	CAIXABANK	47,036.34	6.1707	52,599.55	5,563.21 655.96 C 4,907.25 I
20,953.0000	IBERDROLA SA EUR0.75 (POST SUBDIVISION)	162,793.34	7.6439	160,163.99	2,629.35- 3,138.92 C 5,768.27- I
1,287.0000	AMADEUS IT HLD SA-A SHS0.0100	22,834.54	41.2387	53,074.33	30,239.79 2,052.60- C 32,292.39 I
3,259.0000	INTERNATIONAL CONSOLIDATED AIRLINES GROUP SA	12,069.64	6.3405	20,663.80	8,594.16 1,236.06- C 9,830.22 I
2,247.0000	DISTRIBUIDORA INTERNACIONAL DE ALIMENTACION SA	11,050.21	9.2061	20,686.25	9,636.04 1,167.17- C 10,803.21 I



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19,172.0000	BANKIA SA	28,690.41	1.9387	37,169.07	8,478.66 255.18- C 8,733.84 I
1,268.0000	ABERTISINFRAESTRUCTURAS SA EUR3	19,978.62	23.0085	29,174.86	9,196.24 381.86 C 8,814.38 I
876.0000	INDRA SISTEMAS SA EUR0.20	18,206.51	17.8674	15,651.85	2,554.66- 176.04 C 2,730.70- I
2,143.0000	BANKINTER S A EUR0.3 REGD	11,677.31	7.8246	16,768.32	5,091.01 188.61 C 4,902.40 I
26,770.0000	BANCO BILBAO VIZCAYA ARGENTARIA SA EUR0.49	310,315.15	12.7454	341,194.82	30,879.67 8,051.62 C 22,828.05 I
160.0000	ACCIONA SA EUR1.00	18,151.49	89.4328	14,309.26	3,842.23- 160.94 C 4,003.17- I
989.0000	GAS NAT SDG SA EUR1	17,813.77	31.5794	31,232.08	13,418.31 351.31 C 13,067.00 I
4,460.0000	REPSOL SA	94,964.11	26.3698	117,609.44	22,645.33 3,702.35 C 18,942.98 I



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54,257.0000	BANCO SANTANDER SA	621,537.44	10.4466	566,801.96	54,735.48- 7,752.57 C 62,488.05- I
465.0000	RED ELECTRICA CORPORATION SA EUR2	24,956.17	91.4592	42,528.54	17,572.37 478.35 C 17,094.02 I
19,797.0000	TELEFONICA SA EUR1	455,598.25	17.1417	339,355.38	116,242.87- 3,609.43 C 119,852.30- I
1,120.0000	INDUSTRIA DE DISENO TEXTIL SA EUR0.15	93,373.63	153.8924	172,359.56	78,985.93 933.70 C 78,052.23 I
825.0000	ENAGAS SA EUR1.50	18,520.95	32.1750	26,544.40	8,023.45 298.57 C 7,724.88 I
652.0000	PEUGEOT SA WTS EXP 29-APR-2017	2,029.75	2.1920	1,429.19	600.56- 16.07 C 616.63- I
6,512.0000	GDF SUEZ EUR1	238,042.73	27.5267	179,254.27	58,788.46- 1,618.13 C 60,406.59- I
867.0000	ALSTOM EUR7 (POST CONSOLIDATION	54,968.43	36.4536	31,605.29	23,363.14- 355.48 C 23,718.62- I



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516.0000	EUTELSAT COMMUNICATIONS PROMESSES EUR1	18,310.66	34.7421	17,926.97	383.69- 201.81 C 585.50- I
1,016.0000	EDF EUR0.5	56,137.90	31.4904	31,994.30	24,143.60- 359.87 C 24,503.47- I
195.0000	ARKEMA EUR10	20,051.00	97.3191	18,977.24	1,073.76- 851.73- C 222.03- I
1,214.0000	SES SA FIDUCIARY DR EACH REP 1 'A' SHS	30,871.25	37.9254	46,041.50	15,170.25 517.87 C 14,652.38 I
302.0000	IMERYS EUR2	18,954.78	84.2574	25,445.76	6,490.98 286.20 C 6,204.78 I
270.0000	GEMALTO EUR 1	19,248.55	103.8911	28,050.60	8,802.05 2,836.52 C 5,965.53 I
1,267.0000	SAFRAN SA EUR0.20	51,231.82	65.4659	82,945.31	31,713.49 65.00 C 31,648.49 I
3,742.0000	NATIXIS EUR1.6 (POST SUBDU)	19,027.09	6.4103	23,987.56	4,960.47 244.40 C 4,716.07 I



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706.0000	SCOR SE EUR7.876972 (POST CONSOLIDATION)	18,110.92	34.3930	24,281.49	6,170.57
					273.11 C 5,897.46 I
1,175.0000	REXEL PROMESSES EUR5	28,953.18	23.3850	27,477.47	1,475.71-
					188.65- C 1,287.06- I
2,289.0000	VINCI EUR2.50 (POST SUBDIVISIO	144,095.04	74.7555	171,115.55	27,020.51
					1,771.56 C 25,248.95 I
1,577.0000	AIR LIQUIDE(L') EUR5.5 (POST-SUBDIVISION)	149,926.39	134.9981	212,892.15	62,965.76
					5,053.33 C 57,912.43 I
2,640.0000	DANONE EUR0.25 (POST SUBDIVISION)	167,144.17	74.2626	196,053.52	28,909.35
					2,883.66 C 26,025.69 I
1,100.0000	LEGRAND SA EUR4	48,412.15	61.1804	67,298.51	18,886.36
					12.59 C 18,873.77 I
354.0000	EIFFAGE EUR4(POST SUBDIVISION)	18,751.96	67.9851	24,066.74	5,314.78
					270.69 C 5,044.09 I
10,172.0000	TOTAL SA EUR2.5 POST SUBDIVISION	600,184.37	72.2637	735,066.73	134,882.36
					6,158.01 C 128,724.35 I



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224.0000	ADP PROMESSES EUR3	18,713.19	131.7396	29,509.67	10,796.48 331.93 C 10,464.55 I
490.0000	VALLOUREC (USIN A TUB DE LOR EUR2 (POST SUBDIVISION)	51,152.30	44.7780	21,941.24	29,211.06- 246.79 C 29,457.85- I
1,372.0000	BUREAU VERITAS EUR0.12	18,650.10	27.7526	38,076.66	19,426.56 428.28 C 18,998.28 I
2,044.0000	GET SA EUR0.40 (POST CONSOLIDATION)	21,150.95	13.5230	27,641.21	6,490.26 310.91 C 6,179.35 I
1,155.0000	SUEZ ENVIRONNEMENT CO EUR4	26,813.18	19.1407	22,107.53	4,705.65- 248.67 C 4,954.32- I
629.0000	EDENRED	12,567.63	30.3198	19,071.18	6,503.55 214.52 C 6,289.03 I
961.0000	BOUYGUES EUR1	49,070.48	41.6084	39,985.74	9,084.74- 449.75 C 9,534.49- I
2,546.0000	AIRBUS GROUP	86,464.00	67.0062	170,597.79	84,133.79 2,262.30 C 81,871.49 I



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1,695.0000	VEOLIA ENVIRONMENT EUR5.0	59,620.72	19.0517	32,292.68	27,328.04- 363.23 C 27,691.27- I
1,215.0000	L'OREAL EUR0.2	139,942.09	172.3075	209,353.65	69,411.56 1,576.43 C 67,835.13 I
273.0000	CHRISTIAN DIOR EUR2	30,353.49	198.9374	54,309.94	23,956.45 610.86 C 23,345.59 I
1,361.0000	LVMH MOET HENNESSY EUR0.30	186,588.67	192.7763	262,368.57	75,779.90 1,633.75 C 74,146.15 I
452.0000	THALES EUR3	18,203.80	60.4822	27,337.95	9,134.15 307.48 C 8,826.67 I
628.0000	CAP GEMINI EUR8	31,611.81	71.3327	44,796.95	13,185.14 503.87 C 12,681.27 I
237.0000	CASINO GUICH-PERR EUR1.53	20,341.72	132.5747	31,420.23	11,078.51 353.41 C 10,725.10 I
643.0000	CIE GENERALE DE GEOPHYSIQUE VERITAS	19,416.65	14.1570	9,102.96	10,313.69- 102.39 C 10,416.08- I



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911.0000	PUBLICIS GROUPE SA EUR.4	42,194.96	84.8051	77,257.49	35,062.53 4,552.55 C 30,509.98 I
780.0000	LAFARGE SA EUR4.00	56,002.58	86.8041	67,707.21	11,704.63 761.56 C 10,943.07 I
507.0000	LAGARDERE S.C.A. EUR6.1(REG)	21,301.26	32.5652	16,510.58	4,790.68- 185.71 C 4,976.39- I
163.0000	ICADE NPV (POST MERGER)	17,977.44	107.2044	17,474.32	503.12- 196.54 C 699.66- I
900.0000	MICHELIN CIE GLE DES ETABL ORD EUR2 REGD	76,204.34	119.4720	107,524.83	31,320.49 465.69 C 30,854.80 I
1,102.0000	PERNOD-RICARD EUR1.55	104,055.22	120.0744	132,322.05	28,266.83 795.67 C 27,471.16 I
795.0000	RENAULT REGIE NATIONALE DES USINES EUR3.81	38,225.31	90.4049	71,871.95	33,646.64 808.40 C 32,838.24 I
2,368.0000	SCHNEIDER ELECTRIC SE	149,546.62	94.1290	222,897.62	73,351.00 1,732.41 C 71,618.59 I



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5,447.0000	VIVENDI SA EUR5.5	144,005.27	24.4667	133,270.17	10,735.10- 1,499.01 C 12,234.11- I
446.0000	TECHNIP SA EUR	37,742.57	109.3813	48,784.10	11,041.53 548.71 C 10,492.82 I
359.0000	VALEO EUR3	38,162.09	134.2999	48,213.67	10,051.58 281.71- C 10,333.29 I
7,955.0000	ORANGE SA	191,947.12	15.7794	125,525.56	66,421.56- 1,411.89 C 67,833.45- I
88.0000	HERMES INTL FRF10 POST SPLIT	12,097.74	368.9859	32,470.76	20,373.02 365.24 C 20,007.78 I
188.0000	BIC EUR3.82	20,177.31	136.8054	25,719.43	5,542.12 1,404.18 C 4,137.94 I
308.0000	DASSAULT SYSTEMES SA EUR1	18,588.80	128.6453	39,622.76	21,033.96 445.67 C 20,588.29 I
461.0000	KERING EUR4.00	74,059.99	219.2693	101,083.18	27,023.19 1,698.81 C 25,324.38 I
772.0000	CNP ASSURANCES EUR1	18,295.69	20.7563	16,023.87	2,271.82- 180.23 C 2,452.05- I



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219.0000	NEOPOST FRF4	17,717.08	74.8925	16,401.46	1,315.62- 184.48 C 1,500.10- I
3,047.0000	CARREFOUR EUR2.5	141,868.64	36.8849	112,388.29	29,480.35- 838.35 C 30,318.70- I
369.0000	ATOS EUR1	30,536.20	83.2990	30,737.36	201.16 211.03- C 412.19 I
5,623.0000	SANOFI	432,872.97	106.2186	597,267.51	164,394.54 6,267.67 C 158,126.87 I
629.0000	ACCOR SAR	23,588.47	52.0140	32,716.81	9,128.34 367.99 C 8,760.35 I
2,930.0000	STMICROELECTRONICS EUR1.04 (SICOVAM)	29,763.54	8.9706	26,284.07	3,479.47- 295.64 C 3,775.11- I
3,593.0000	SOCIETE GENERALE EUR1.25	201,658.04	52.3768	188,189.97	13,468.07- 2,543.35 C 16,011.42- I
12,929.0000	ALCATEL LUCENT EUR2 SER'A'	46,176.48	3.5707	46,166.14	10.34- 575.85 C 586.19- I



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989.0000	SOCIETE TELEVISION FRANCAISE 1	18,833.76	16.3818	16,201.69	2,632.07- 182.24 C 2,814.31- I
323.0000	EURAZEONCE NPV	18,098.51	83.1758	26,865.80	8,767.29 423.13 C 8,344.16 I
404.0000	SODEXO EUR4	24,650.84	107.5467	43,448.88	18,798.04 488.71 C 18,309.33 I
502.0000	UNIBAIL-RODAMCO SE EUR5	95,185.32	290.8759	146,019.71	50,834.39 842.67 C 49,991.72 I
9,177.0000	AXA EUR2.29	193,178.65	23.8985	219,316.66	26,138.01 4,516.28 C 21,621.73 I
652.0000	PEUGEOT SA EUR1	14,349.77	14.7799	9,636.54	4,713.23- 108.38 C 4,821.61- I
652.0000	JC DECAUX SA NPV	18,518.33	37.3093	24,325.69	5,807.36 273.61 C 5,533.75 I
862.0000	ESSILOR INTERNATIONAL EURO.18	55,719.70	106.0406	91,407.06	35,687.36 1,028.14 C 34,659.22 I
3,980.0000	CREDIT AGRICOLE SA EUR3	71,210.08	14.1022	56,126.94	15,083.14- 631.31 C 15,714.45- I



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1,405.0000	ZODIAC AEROSPACE NPV	26,281.02	33.8453	47,552.77	21,271.75 4,263.30 C 17,008.45 I
4,843.0000	BNP PARIBAS EUR2	368,265.26	67.8345	328,522.67	39,742.59- 4,118.59 C 43,861.18- I
2,338.0000	COMPAGNIE DE SAINT-GOBAIN EUR4	119,989.69	56.4158	131,900.20	11,910.51 915.24 C 10,995.27 I
261.0000	WENDEL EUR4	19,350.98	143.2130	37,378.62	18,027.64 3,779.78 C 14,247.86 I
463.0000	KLEPIERRE EUR1.4	18,320.72	50.9529	23,591.21	5,270.49 265.35 C 5,005.14 I
246.0000	GECINA EUR7.50	30,011.36	145.8144	35,870.36	5,859.00 474.20 C 5,384.80 I
161.0000	FONCIERE DES REGIO EUR2	17,682.71	108.4092	17,453.90	228.81- 196.32 C 425.13- I
127.0000	ILIAD NPV	30,714.87	302.2398	38,384.46	7,669.59 263.54- C 7,933.13 I



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5,321.0000	BANK OF CYPRUS PUBLIC CO LTD EUR1	19,474.23	0.2834	1,508.05	17,966.18- 65.10 C 18,031.28- I
2,158.0000	HELLENIC TELECOM ORGANIZATION SA EUR2.83	19,258.95	14.7868	31,909.96	12,651.01 1,432.17- C 14,083.18 I
950.0000	OPAP SA EUR0.3 (CR)	16,120.51	17.7989	16,909.00	788.49 342.09- C 1,130.58 I
3,281.0000	CNH INDUSTRIAL NV	39,456.65	10.2686	33,691.36	5,765.29- 810.82 C 6,576.11- I
2,122.0000	BANCO POPOLARE SC	41,619.80	16.4708	34,951.20	6,668.60- 52.80 C 6,721.40- I
12,839.0000	BCA MPS NPV (POST REVERSE SPLIT)	34,440.99	1.9373	24,873.61	9,567.38- 172.58 C 9,739.96- I
1,736.0000	FINMECCANICA SPA EUR 4.40	23,512.85	9.5087	16,507.18	7,005.67- 185.67 C 7,191.34- I
4,151.0000	T. E. R. N. A. ORD EURO.22	18,033.29	5.2739	21,892.23	3,858.94 246.24 C 3,612.70 I



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727.0000	EXOR SPA EUR1	29,454.72	41.0608	29,851.21	396.49 204.94- C 601.43 I
1,187.0000	PRYSMIAN CAB & SYS NPV	29,389.44	22.5909	26,815.49	2,573.95- 184.11- C 2,389.84- I
19,728.0000	ENEL GREEN POWER SPA EUR0.20	48,149.71	2.8314	55,857.90	7,708.19 78.74- C 7,786.93 I
20,852.0000	UNICREDIT SPA	205,479.80	8.3723	174,580.29	30,899.51- 3,619.56 C 34,519.07- I
5,010.0000	ASSICURAZIONI GENERALI EUR1	122,345.79	21.9200	109,819.66	12,526.13- 1,235.24 C 13,761.37- I
2,871.0000	BANCA POPOLARE DI MILANO EUR	6,069.44	0.8967	2,574.70	3,494.74- 28.96 C 3,523.70- I
58,974.0000	INTESA SANPAOLO EUR0.52	187,522.71	3.0888	182,159.03	5,363.68- 10.24- C 5,353.44- I
6,069.0000	INTESA SANPAOLO EUR0.52 NON CNV	18,453.94	2.6588	16,136.80	2,317.14- 181.50 C 2,498.64- I



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2,032.0000	MEDIOBANCA SPA EUR0.5	22,155.17	9.9674	20,253.78	1,901.39- 227.81 C 2,129.20- I
1,642.0000	PIRELLI & C SPA	18,117.50	16.0464	26,348.25	8,230.75 1,438.50 C 6,792.25 I
1,356.0000	SAIPEM EUR1	54,253.25	26.9722	36,574.38	17,678.87- 411.39 C 18,090.26- I
673.0000	LUXOTTICA GROUP EURO.06	18,212.35	57.8739	38,949.18	20,736.83 438.09 C 20,298.74 I
3,041.0000	MEDIASET EUR0.52	26,422.18	4.8741	14,822.36	11,599.82- 166.72 C 11,766.54- I
9,621.0000	A2A SPA EUR0.52	18,230.29	1.1535	11,097.91	7,132.38- 124.83 C 7,257.21- I
3,281.0000	FIAT SPA EUR3.58	43,438.88	9.8715	32,388.63	11,050.25- 364.31 C 11,414.56- I
966.0000	BENI STABILI SPA EUR0.1	701.66	0.9173	886.14	184.48 102.62 C 81.86 I
34,992.0000	ENEL EUR1	189,864.99	5.8243	203,806.15	13,941.16 1,718.13 C 12,223.03 I



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12,388.0000	ENI EUR	295,670.77	27.3556	338,881.38	43,210.61 3,198.34 C 40,012.27 I
11,102.0000	SNAM SPA	53,851.61	6.0242	66,881.33	13,029.72 1,864.97 C 11,164.75 I
2,025.0000	TENARIS S AU\$1	44,898.23	23.5493	47,687.49	2,789.26 536.38 C 2,252.88 I
2,467.0000	UBI BANCA SCPA EUR2.5	33,547.36	8.6530	21,347.02	12,200.34- 240.11 C 12,440.45- I
43,054.0000	TELECOM ITALIA EUR0.00	62,978.57	1.2664	54,526.33	8,452.24- 613.31 C 9,065.55- I
25,852.0000	TELECOM ITALIA DI RISP EUR0.00	29,464.83	0.9878	25,537.69	3,927.14- 287.25 C 4,214.39- I
1,278.0000	ATLANTIA SPA	26,251.10	28.5057	36,430.29	10,179.19 409.76 C 9,769.43 I
793.0000	OCI NV EUR1.00	31,280.87	39.0207	30,943.47	337.40- 212.45- C 124.95- I
417.0000	ALTICE SA	28,650.09	69.6623	29,049.20	399.11 201.55 C 197.56 I



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4,720.0000	AHOLD(KON)NV EUR0.01	68,572.73	18.7710	88,599.34	20,026.61 996.55 C 19,030.06 I
642.0000	HEINEKEN HOLDING EUR1.6	38,143.86	65.7397	42,204.91	4,061.05 132.76- C 4,193.81 I
661.0000	KONINKLIJKE DSM NV EUR1.5	30,260.33	72.8250	48,137.38	17,877.05 541.44 C 17,335.61 I
5,080.0000	ARCELORMITTAL NPV (POST-REORGANISATION)	179,518.08	14.8278	75,325.70	104,192.38- 860.04 C 105,052.42- I
287.0000	FUGRO NV CVZ EURO0.05 (POST-SUBDIVISION)	19,572.09	57.2510	16,431.05	3,141.04- 184.81 C 3,325.85- I
632.0000	BOSKALIS WESTMINSTER GROEP NV NV CVA EUR0.80(POST SUBDIVIS)	30,386.74	57.3468	36,243.21	5,856.47 248.82- C 6,105.29 I
7,747.0000	UNILEVER NV CVA EUR0.16	249,009.53	43.7511	338,940.46	89,930.93 3,075.31 C 86,855.62 I
904.0000	SBM OFFSHORE NV EUR0.25 (POST SUBDIVISION)	18,525.20	16.1354	14,586.43	3,938.77- 164.07 C 4,102.84- I



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1,617.0000	TNT EXPRESS NV	20,291.01	9.0500	14,633.98	5,657.03- 436.08- C 5,220.95- I
965.0000	DELTA LLOYD NV	19,727.14	25.3840	24,495.60	4,768.46 1,069.89 C 3,698.57 I
714.0000	ZIGGO BV	30,912.15	46.2361	33,012.64	2,100.49 226.65- C 2,327.14 I
1,946.0000	ASML HOLDING NV EUR0.09 (POST SPLIT)	81,450.95	93.1158	181,203.52	99,752.57 604.82 C 99,147.75 I
3,105.0000	REED ELSEVIER NV EUR0.07	38,055.54	22.9332	71,207.78	33,152.24 800.93 C 32,351.31 I
591.0000	CORIO NV EUR10	38,989.57	51.0692	30,181.95	8,807.62- 127.93 C 8,935.55- I
575.0000	RANDSTAD HLDGS EUR0.1	28,889.10	54.2046	31,167.67	2,278.57 501.98- C 2,780.55 I
994.0000	AKZO NOBEL NV EUR2	57,823.60	74.9609	74,511.20	16,687.60 838.10 C 15,849.50 I



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1,044.0000	WOLTERS KLUWERS COM EUR0.12	22,999.06	29.6010	30,903.47	7,904.41 347.60 C 7,556.81 I
327.0000	KONINKLIJKE VOPAK NV EUR0.5	20,674.13	48.8786	15,983.32	4,690.81- 642.65 C 5,333.46- I
10,059.0000	AEGON NV EUR0.12	76,526.73	8.7269	87,784.52	11,257.79 395.31 C 10,862.48 I
16,897.0000	KONINKLIJKE KPN NV EUR0.04	83,277.41	3.6433	61,560.98	21,716.43- 1,104.40 C 22,820.83- I
4,172.0000	KONINKLIJKE PHILIPS NV	136,830.95	31.7300	132,377.77	4,453.18- 1,488.96 C 5,942.14- I
17,928.0000	ING GROEP N.V. CVA EUR0.24	192,981.14	14.0474	251,843.20	58,862.06 2,145.36 C 56,716.70 I
1,051.0000	HEINEKEN NV EUR1.60	54,057.52	71.7845	75,445.55	21,388.03 848.61 C 20,539.42 I
1,042.0000	GALP ENERGIA SGPS EUR1	18,530.54	18.3192	19,088.63	558.09 214.70 C 343.39 I
956.0000	JERONIMO MARTINS EUR1 (POST SUBDIVISION)	20,829.09	16.4503	15,726.52	5,102.57- 648.98 C 5,751.55- I



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2,285.0000	EDP RENOVAVEIS SA	18,104.95	7.4454	17,012.83	1,092.12- 191.37 C 1,283.49- I
4,636.0000	BANCO ESPIRITO SANTO SA EUR(REGD)	12,190.60	0.8242	3,821.12	8,369.48- 42.81 C 8,412.29- I
7,501.0000	EDP ENERGIAS PORTUGAL EUR1(REGD)	30,062.13	5.0165	37,629.25	7,567.12 423.25 C 7,143.87 I
2,501.0000	PORTUGAL TELECOM SGPS SA EUR0.03 REG1	28,041.08	3.6638	9,163.28	18,877.80- 103.06 C 18,980.86- I
2,560.0000	CIE FINANCIERE RICHEMONT SA	118,608.56	104.9278	268,615.25	150,006.69 32,009.43 C 117,997.26 I
370.0000	SWISS PRIME SITE AG	27,077.95	82.8822	30,666.44	3,588.49 1,997.87 C 1,590.62 I
166.0000	GEBERIT CHF0.10 (REGD) (POST SUBDIVISION)	30,381.52	351.0374	58,272.21	27,890.69 8,909.07 C 18,981.62 I
1,482.0000	GAM HOLDING LTD	18,469.64	19.0572	28,242.90	9,773.26 4,317.98 C 5,455.28 I



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437.0000	ACTELION CHF0.5 (REGD)(POST SUBD)	20,151.69	126.5223	55,290.26	35,138.57
					8,453.16 C 26,685.41 I
207.0000	SCHINDLER HLDG AG PTG CERT CHF0.10 (POST-SUBD)	18,695.40	152.0072	31,465.49	12,770.09
					4,810.67 C 7,959.42 I
114.0000	PARTNERS GRP HLDG AG CHF0.01 (REGD)	29,614.44	273.3423	31,161.03	1,546.59
					301.02 C 1,245.57 I
404.0000	KUEHNE & NAGEL AG CHF1(REGD) (POST-SUBD)	48,427.59	133.0626	53,757.33	5,329.74
					3,765.87 C 1,563.87 I
16,685.0000	UBS AG CHF0.1 (POST SUBDIVISION)	289,533.73	18.3468	306,117.44	16,583.71
					42,798.90 C 26,215.19- I
1,112.0000	LOGITECH INTL SA CHF0.25(REGD) (POST SUBDIVISION)	18,534.64	13.0243	14,483.09	4,051.55-
					2,214.28 C 6,265.83- I
433.0000	ARYZTA AG CHF0.02 (REGD)	18,559.87	94.7225	41,014.88	22,455.01
					6,334.99 C 16,120.02 I



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886.0000	JULIUS BAER GRUPPE AG	32,880.14	41.2268	36,527.02	3,646.88 5,584.52 C 1,937.64- I
733.0000	TRANSOCEAN LTD	51,188.98	44.9481	32,946.98	18,242.00- 2,666.76 C 20,908.76- I
1,935.0000	SWISS RE LTD	100,377.75	88.9715	172,160.01	71,782.26 20,058.31 C 51,723.95 I
480.0000	SYNGENTA AG CHF0.1	144,459.96	372.4627	178,782.14	34,322.18 22,532.55 C 11,789.63 I
18.0000	SIKA FINANZ AG CHF0.6 (BR)	53,847.01	4,088.8588	73,599.46	19,752.45 2,103.69 C 17,648.76 I
24.0000	SGS SA CHF1(REGD)	33,947.33	2,396.2562	57,510.15	23,562.82 8,792.57 C 14,770.25 I
198.0000	SULZER AG CHF0.01(REGD)	29,954.32	140.2796	27,775.37	2,178.95- 268.31 C 2,447.26- I
101.0000	SWISSCOM AG CHF1.00	37,259.87	581.3035	58,711.66	21,451.79 8,976.26 C 12,475.53 I
33.0000	GIVAUDAN AG CHF10	29,299.64	1,667.7943	55,037.21	25,737.57 8,414.49 C 17,323.08 I



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742.0000	ZURICH INSURANCE GROUP AG CHF0.1	186,562.76	301.4208	223,654.26	37,091.50 29,570.99 C 7,520.51 I
10,939.0000	NOVARTIS AG CHF0.50 (REGD)	627,146.96	90.5502	990,529.66	363,382.70 117,245.76 C 246,136.94 I
10,628.0000	ABB LTD CHF1.03 (REGD)	236,353.90	23.0266	244,726.84	8,372.94 33,559.12 C 25,186.18- I
3,341.0000	ROCHE HLDG AG GENUSSCHEINE NPV	583,732.42	298.2634	996,498.08	412,765.66 132,846.19 C 279,919.47 I
527.0000	ADECCO SA CHF1 (REGD)	30,849.59	82.3184	43,381.82	12,532.23 6,632.52 C 5,899.71 I
1,052.0000	HOLCIM CHF2 (REGD)	80,132.13	87.9003	92,471.13	12,339.00 14,137.65 C 1,798.65- I
15,315.0000	NESTLE SA	806,557.92	77.4695	1,186,446.21	379,888.29 166,529.71 C 213,358.58 I
206.0000	BALOISE HOLDING AG CHF0.1	18,644.45	117.8394	24,274.92	5,630.47 3,711.33 C 1,919.14 I



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196.0000	SONOVA HLDG CHF0.05	24,539.18	152.5710	29,903.92	5,364.74 4,571.92 C 792.82 I
123.0000	STRAUMANN HOLDING AG	32,481.51	231.6193	28,489.17	3,992.34- 170.84 C 4,163.18- I
6,898.0000	CREDIT SUISSE GROUP AG CHF0.04 REGD	310,723.76	28.5972	197,263.51	113,460.25- 27,195.79 C 140,656.04- I
132.0000	SWATCH GROUP CHF2.25 (BR)	42,640.60	603.8565	79,709.07	37,068.47 12,186.50 C 24,881.97 I
218.0000	SWATCH GROUP CHF0.45 (REGD)	20,395.28	111.0735	24,214.03	3,818.75 1,577.52 C 2,241.23 I
223.0000	LONZA GROUP AG CHF1(REGISTERED)	18,318.22	108.8182	24,266.46	5,948.24 3,710.03 C 2,238.21 I
140.0000	SWISS LIFE HOLDING AG CHF5.1	18,409.20	237.1447	33,200.27	14,791.07 5,079.00 C 9,712.07 I
3,112.0000	ROYAL MAIL PLC	30,016.04	8.5321	26,552.06	3,463.98- 420.06 C 3,884.04- I



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1,126.0000	WOLSELEY ORD GBP0.108030303(POST CON	29,829.79	54.7664	61,667.07	31,837.28
					6,549.71 C 25,287.57 I
1,400.0000	IMI ORD GBP0.2857	20,637.40	25.4254	35,595.66	14,958.26
					2,923.90 C 12,034.36 I
5,245.0000	MELROSE INDUSTRIES PLC NEW ORD GBP0.0011818181	21,441.96	4.4490	23,335.16	1,893.20
					1,916.79 C 23.59- I
127,172.0000	VODAFONE GROUP PLC	564,550.11	3.3342	424,017.84	140,532.27- 42,973.19 C 183,505.46- I
2,928.0000	RSA INSURANCE GROUP PLC	28,977.19	8.1183	23,770.57	5,206.62- 2,524.63 C 7,731.25- I
790.0000	AGGREKO ORD GBP0.048329113924	21,707.08	28.2125	22,287.89	580.81 1,487.29 C 906.48- I
3,226.0000	REXAM NEW ORD GBP0.8035714	18,387.36	9.1476	29,510.47	11,123.11 3,134.24 C 7,988.87 I
231.0000	KAZAKHMYS ORD GBP0.20	938.72	5.1996	1,201.12	262.40 77.55 C 184.85 I



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956.0000	PETROFAC LTD ORD SHS 0.02 USD	20,118.23	20.5694	19,664.44	453.79- 1,312.23 C 1,766.02- I
987.0000	LONDON STOCK EXCHANGE GROUP ORD GBP0	29,580.89	34.3166	33,870.57	4,289.68 535.84 C 3,753.84 I
298.0000	RANDGOLD RESOURCES ORD USD0.05	23,786.27	83.3209	24,829.66	1,043.39 2,637.11 C 1,593.72- I
4,563.0000	G4S PLC ORD GBP0.25	18,638.76	4.3635	19,910.83	1,272.07 2,114.70 C 842.63- I
5,156.0000	SAINSBURY (J) ORD GBP0.2857142 (POST REC	26,099.86	5.3945	27,814.44	1,714.58 2,954.13 C 1,239.55- I
905.0000	ADMIRAL GROUP ORD GBP0.001	18,525.30	26.4855	23,969.45	5,444.15 2,545.75 C 2,898.40 I
18,062.0000	ROYAL DUTCH SHELL PLC A SHS	548,137.88	41.3527	746,912.87	198,774.99 73,630.64 C 125,144.35 I
12,401.0000	ROYAL DUTCH SHELL PLC B SHS	355,504.96	43.4729	539,107.89	183,602.93 55,082.27 C 128,520.66 I



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27,211.0000	CENTRICA ORD GBP0.061728395	130,799.31	5.3449	145,442.56	14,643.25 13,849.93 C 793.32 I
4,618.0000	COBHAM ORD GBP0.025	18,842.13	5.3398	24,659.47	5,817.34 2,619.03 C 3,198.31 I
1,634.0000	BUNZL ORD GBP0.3214857	18,582.17	27.7337	45,316.98	26,734.81 4,813.01 C 21,921.80 I
19,480.0000	NATIONAL GRID PLC NEW ORD GBP0.11395	199,751.52	14.3627	279,786.18	80,034.66 25,689.11 C 54,345.55 I
1,583.0000	INMARSAT ORD EUR0.000667	18,488.72	12.7811	20,232.54	1,743.82 2,148.87 C 405.05- I
992.0000	SEVERN TRENT ORD GBP0.9789	18,415.82	33.0343	32,770.03	14,354.21 3,480.45 C 10,873.76 I
809.0000	WHITBREAD ORD GBP0.76797385	18,611.54	75.3872	60,988.31	42,376.77 6,477.47 C 35,899.30 I
4,446.0000	THOMAS COOK GROUP PLC ORD EUR0.01	16,053.61	2.2826	10,148.66	5,904.95- 1,077.87 C 6,982.82- I



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1,380.0000	HARGREAVES LANSDOWN ORD GBP0.004 (WI)	20,437.23	21.1679	29,211.76	8,774.53
					3,083.74 C 5,690.79 I
1,672.0000	SMITHS GROUP PLC ORD GBP0.375	29,445.57	22.1767	37,079.53	7,633.96
					3,938.15 C 3,695.81 I
6,881.0000	ANGLO AMERICAN USD0.54(POST CONSOLIDATION)	286,082.50	24.4508	168,246.33	117,836.17-
					17,026.38 C 134,862.55- I
4,162.0000	3I GROUP PLC ORD GBP0.738636	18,766.11	6.8718	28,600.80	9,834.69
					3,037.65 C 6,797.04 I
6,246.0000	UNILEVER PLC ORD GBP0.031111	197,350.95	45.3281	283,119.46	85,768.51
					28,012.90 C 57,755.61 I
79.0000	SCHNEIDER ELECTRIC SA	18,450.90	94.1290	7,436.20	11,014.70-
					579.85 C 11,594.55- I
9,594.0000	STANDARD LIFE ORD GBP0.10	29,929.16	6.3965	61,368.48	31,439.32
					6,517.82 C 24,921.50 I
2,202.0000	INVESTEC ORD GBP0.0002	18,256.68	9.2160	20,293.83	2,037.15
					2,155.36 C 118.21- I



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4,382.0000	HOME RETAIL GROUP ORD GBP0	18,424.72	3.0230	13,246.86	5,177.86- 1,406.93 C 6,584.79- I
5,784.0000	EXPERIAN PLC ORD USD0.10	64,346.11	16.8933	97,710.95	33,364.84 9,972.92 C 23,391.92 I
5,202.0000	REED ELSEVIER ORD GBP0.14	42,048.29	16.0725	83,609.61	41,561.32 8,880.01 C 32,681.31 I
2,407.0000	SHIRE PLC ORD GBP0.05	53,292.82	78.1401	188,083.33	134,790.51 19,975.96 C 114,814.55 I
1,415.0000	FRESNILLO PLC	18,875.03	14.9098	21,097.50	2,222.47 2,240.73 C 18.26- I
4,124.0000	CAPITA PLC	44,947.74	19.5777	80,738.78	35,791.04 7,874.21 C 27,916.83 I
3,251.0000	RECKITT BENCKISER GROUP PLC ORD GBP0.10	194,987.73	87.2023	283,494.84	88,507.11 28,212.61 C 60,294.50 I
2,923.0000	UNITED UTILITIES GROUP PLC ORD GBP0.05	25,469.15	15.0808	44,081.40	18,612.25 4,681.81 C 13,930.44 I



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52,453.0000	GLENCORE PLC	288,989.26	5.5664	291,975.25	2,985.99 22,732.50 C 19,746.51- I
3,622.0000	SEGRO PLC	17,700.66	5.9024	21,378.49	3,677.83 2,270.57 C 1,407.26 I
2,355.0000	CAPITAL & COUNTIES PROPERTIES PLC GBP0.25	3,635.56	5.5689	13,114.96	9,479.40 1,618.82 C 7,860.58 I
4,585.0000	FRIENDS LIFE GROUP LIMITED	22,348.12	5.3911	24,718.46	2,370.34 1,258.87 C 1,111.47 I
7,955.0000	ROLLS-ROYCE HLDGS PLC ORD GBP0.20	74,690.75	18.2782	145,403.85	70,713.10 15,443.06 C 55,270.04 I
1,286.0000	EASYJET ORD GBP0.27285714(POSTCONS)	30,465.81	23.3394	30,014.54	451.27- 1,177.86 C 1,629.13- I
11,315.0000	ROYAL BANK OF SCOT ORD GBP1 (POST CONS)	70,830.38	5.6151	63,535.39	7,294.99- 6,735.86 C 14,030.85- I
880.0000	JOHNSON MATTHEY ORD GBP1.04761 (POST CONSOLIDATION)	25,305.50	53.0053	46,644.71	21,339.21 4,954.05 C 16,385.16 I



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19,813.0000	OLD MUTUAL PLC ORD GBP0.114285714(POST CON	43,009.40	3.3803	66,975.34	23,965.94
					7,113.33 C 16,852.61 I
5,199.0000	SAGE GROUP GBP0.01051948	20,284.02	6.5675	34,144.61	13,860.59
					3,626.43 C 10,234.16 I
6,779.0000	WPP PLC ORD GBP0.10	86,987.17	21.7834	147,670.27	60,683.10
					13,231.59 C 47,451.51 I
7,342.0000	MAN GROUP PLC ORD USD0.03428571	27,575.04	1.7987	13,206.51	14,368.53-
					1,402.64 C 15,771.17- I
1,065.0000	INTERCONTINENTAL HOTELS GROUP PLC	18,339.82	41.3954	44,086.17	25,746.35
					4,682.32 C 21,064.03 I
8,396.0000	DIRECT LINE INSURANCE GROUP PL	30,465.25	4.6131	38,732.22	8,266.97
					2,191.62 C 6,075.35 I
975.0000	COCA COLA HBC ORD CHF0.10	24,101.33	22.9461	22,372.53	1,728.80-
					8,147.38 C 9,876.18- I



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5,943.0000	ABERDEEN ASSET MANAGEMENT PLC	24,266.65	7.7610	46,123.68	21,857.03 4,291.79 C 17,565.24 I
1,507.0000	AMEC ORD 50P	18,828.50	20.7746	31,307.44	12,478.94 3,325.10 C 9,153.84 I
1,626.0000	ANTOFAGASTA ORD GBP0.05	26,861.51	13.0461	21,213.05	5,648.46- 2,252.99 C 7,901.45- I
10,421.0000	BHP BILLITON PLC USD0.50	364,837.59	32.3076	336,677.67	28,159.92- 34,449.51 C 62,609.43- I
6,479.0000	ARM HOLDINGS ORD GBP0.0005	39,808.11	15.0637	97,598.22	57,790.11 8,749.57 C 49,040.54 I
4,030.0000	BALFOUR BEATTY ORD GBP0.50	18,313.40	3.9925	16,089.77	2,223.63- 1,708.86 C 3,932.49- I
3,706.0000	BRITISH LAND ORD GBP0.25	27,746.82	12.0116	44,515.35	16,768.53 4,727.89 C 12,040.64 I
4,889.0000	BRITISH SKY BRDCSTG ORD 50P	46,016.87	15.4570	75,569.49	29,552.62 8,026.11 C 21,526.51 I



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3,796.0000	TULLOW OIL PLC ORD GBP0.10	74,782.42	14.5935	55,397.19	19,385.23- 5,883.63 C 25,268.86- I
16,080.0000	AVIVA PLC GBP0.25	100,113.81	8.7287	140,358.85	40,245.04 12,914.50 C 27,330.54 I
599.0000	CRODA INTL ORD 10P	20,951.73	37.6337	22,542.65	1,590.92 2,160.87 C 569.95- I
11,660.0000	DIAGEO ORD 28 101/108P	215,670.94	31.9058	372,021.64	156,350.70 37,029.21 C 119,321.49 I
843.0000	SCHRODERS (NEW) ORD GBP1	18,538.71	42.8488	36,121.57	17,582.86 3,836.41 C 13,746.45 I
15,189.0000	BAE SYSTEMS ORD GBP0.025	87,247.42	7.4019	112,428.07	25,180.65 11,940.76 C 13,239.89 I
9,113.0000	BRITISH AMERICAN TOBACCO ORD GBP0.25	330,494.11	59.4685	541,937.20	211,443.09 55,186.88 C 156,256.21 I
3,181.0000	FIRSTGROUP ORD5P	13,409.42	2.1646	6,885.82	6,523.60- 731.33 C 7,254.93- I



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3,031.0000	HAMMERSON ORD 25P REITS	18,399.06	9.9171	30,058.82	11,659.76 3,192.49 C 8,467.27 I
11,675.0000	STANDARD CHARTERED ORD USD0.50	312,901.54	20.4156	238,352.24	74,549.30- 23,226.80 C 97,776.10- I
5,162.0000	IMPERIAL TOBACCO GROUP ORD 10P	164,751.52	44.9690	232,130.26	67,378.74 22,616.95 C 44,761.79 I
4,627.0000	SABMILLER PLC	152,826.92	57.9297	268,040.81	115,213.89 25,925.98 C 89,287.91 I
7,958.0000	COMPASS GROUP ORD GBP0.10	64,997.08	17.3891	138,383.05	73,385.97 14,697.41 C 58,688.56 I
91,724.0000	HSBC HOLDINGS PLC	950,828.52	10.1377	929,870.46	20,958.06- 90,426.00 C 111,384.06- I
25,149.0000	LEGAL & GENERAL GROUP ORD 2.5P	34,299.28	3.8540	96,924.30	62,625.02 10,294.15 C 52,330.87 I
3,624.0000	MEGGITT ORD5P	20,203.67	8.6518	31,354.27	11,150.60 3,031.18 C 8,119.42 I
9,096.0000	MORRISON (W) SUPMKT ORD 10P	41,234.92	3.1358	28,523.82	12,711.10- 3,029.46 C 15,740.56- I



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1,884.0000	ASSOCIATED BRITISH FOODS PLC	49,779.50	52.1333	98,219.19	48,439.69 4,834.55 C 43,605.14 I
3,479.0000	PEARSON ORD GBP0.25	55,814.01	19.7316	68,646.48	12,832.47 7,290.82 C 5,541.65 I
1,365.0000	PERSIMMON ORD 10P	29,439.90	21.7663	29,711.12	271.22 639.46 C 368.24- I
2,355.0000	INTU PROPERTIES PLC GBP0.50	18,475.62	5.3278	12,547.19	5,928.43- 1,332.62 C 7,261.05- I
12,318.0000	PRUDENTIAL PLC GBP0.05	124,707.47	22.9290	282,440.51	157,733.04 26,783.20 C 130,949.84 I
5,885.0000	RIO TINTO PLC	362,318.02	53.1506	312,791.80	49,526.22- 33,221.03 C 82,747.25- I
1,023.0000	TRAVIS PERKINS ORD GBP0.10	29,702.69	28.0073	28,651.51	1,051.18- 1,621.21 C 2,672.39- I
5,265.0000	SSE PLC	97,602.51	26.7933	141,066.99	43,464.48 12,876.63 C 30,587.85 I
1,978.0000	SERCO GROUP ORD 2P	18,344.94	6.2495	12,361.51	5,983.43- 1,312.89 C 7,296.32- I



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90,301.0000	BP PLC ORD USD.25	847,490.21	8.8040	795,011.60	52,478.61- 82,725.97 C 135,204.58- I
259,135.0000	LLOYDS BANKING GROUP PLC GBP0.1	272,415.78	1.2695	328,988.37	56,572.59 28,090.74 C 28,481.85 I
3,147.0000	TATE & LYLE ORD 25P	34,529.24	11.7039	36,832.26	2,303.02 3,560.76 C 1,257.74- I
15,955.0000	BG GROUP PLC ORD GBP0.10	289,197.37	21.1166	336,916.11	47,718.74 34,130.15 C 13,588.59 I
39,069.0000	TESCO ORD 5P	259,686.63	4.8593	189,851.66	69,834.97- 19,121.72 C 88,956.69- I
3,800.0000	SMITH & NEPHEW ORD USD0.20	38,073.71	17.7653	67,508.30	29,434.59 7,169.93 C 22,264.66 I
23,425.0000	GLAXOSMITHKLINE ORD GBP0.25	460,647.32	26.7420	626,432.61	165,785.29 64,567.77 C 101,217.52 I
711.0000	WEIR GROUP ORD 12.5P	19,989.93	44.7809	31,839.27	11,849.34 2,979.38 C 8,869.96 I



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1,874.0000	BABCOCK INTL GROUP ORD GBP0.60	21,149.32	19.8684	37,233.49	16,084.17 3,262.05 C 12,822.12 I
6,506.0000	ASTRAZENECA ORD USD0.25	299,293.19	74.2160	482,849.55	183,556.36 48,930.54 C 134,625.82 I
10,769.0000	GKN ORD GBP0.01	29,649.06	6.2084	66,858.97	37,209.91 5,321.81 C 31,888.10 I
38,376.0000	BT GROUP ORD GBP0.05	93,805.20	6.5812	252,560.61	158,755.41 22,958.84 C 135,796.57 I
336.0000	ASSEENONSCREEN HLDGS ORD GBP0.035	28,664.10	50.6115	17,005.48	11,658.62- 589.77 C 12,248.39- I
717.0000	CARNIVAL PLC ORD USD1.66	29,936.94	37.7534	27,069.25	2,867.69- 2,874.97 C 5,742.66- I
6,777.0000	MARKS & SPENCER GROUP ORD GBP0.25	38,730.87	7.2702	49,270.70	10,539.83 5,232.95 C 5,306.88 I
80,171.0000	BARCLAYS ORD GBP0.25	404,170.10	3.6385	291,707.06	112,463.04- 25,761.36 C 138,224.40- I



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680.0000	INTERTEK GROUP PLC ORD GBP0.01	19,764.86	47.0037	31,962.57	12,197.71 2,990.90 C 9,206.81 I
2,851.0000	WILLIAM HILL PLC	19,998.86	5.6083	15,989.29	4,009.57- 1,800.60 C 5,810.17- I
1,861.0000	BURBERRY GROUP ORD GBP0.0005	20,734.47	25.3570	47,189.52	26,455.05 5,011.92 C 21,443.13 I
3,244.0000	LAND SECS GP ORD GBP0.10 REITS	33,799.22	17.7140	57,464.37	23,665.15 6,103.19 C 17,561.96 I
846.0000	NEXT GROUP ORD GBP0.10	28,380.76	110.7127	93,663.02	65,282.26 9,947.74 C 55,334.52 I
10,129.0000	KINGFISHER ORD GBP0.157142857	33,761.54	6.1383	62,175.46	28,413.92 6,603.53 C 21,810.39 I
3,159.0000	ICAP ORD GBP0.10	18,331.33	6.4974	20,525.38	2,194.05 2,179.96 C 14.09 I
15,062.0000	ITV ORD GBP0.10	31,684.10	3.0469	45,893.19	14,209.09 5,080.91 C 9,128.18 I
1,365.0000	PERSIMMON C SHARE INCOME NPV	1,604.38	1.1968	1,633.76	29.38 C



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3,654.0000	RYANAIR HLDGS ORD EUR0.00635	19,865.90	9.4608	34,569.86	14,703.96 388.84 C 14,315.12 I
103,141.0000	BK OF IRELAND ORD STK EUR0.1	45,967.37	0.3381	34,880.23	11,087.14- 566.21 C 11,653.35- I
3,727.0000	CRH ORD EUR0.32 DUBLIN LIST	95,173.53	25.6578	95,626.89	453.36 530.57 C 77.21- I
602.0000	KERRY GROUP 'A' ORD EUR0.125 DUBLIN LISTING	19,189.59	75.0978	45,208.92	26,019.33 508.48 C 25,510.85 I
16,000.0000	FIH MOBILE LIMITED	17,522.00	0.6348	10,156.96	7,365.04- 22.10 C 7,387.14- I
1,750.0000	KERRY LOGISTICS NETWORK LTD	1,828.41	1.5792	2,763.75	935.34 0.82 C 934.52 I
750.0000	SUN HUNG KA-CW16 WTS EXP 22-APR-2016	257.44	1.3057	979.31	721.87 1.59 C 720.28 I
14,140.0000	LINK REAL ESTATE INVT TRUST UNITS	61,253.71	5.3804	76,078.89	14,825.18 210.44 C 14,614.74 I



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12,000.0000	SJM HOLDINGS LIMITED HKD1.00	18,850.68	2.5056	30,068.32	11,217.64 109.20 C 11,108.44 I
8,800.0000	WYNN MACAU LTD	19,851.95	3.9224	34,517.15	14,665.20 125.37 C 14,539.83 I
57,200.0000	AIA GROUP LTD	197,587.73	5.0255	287,463.15	89,875.42 458.97 C 89,416.45 I
11,600.0000	SANDS CHINA LTD	19,090.29	7.5544	87,632.17	68,541.88 190.65 C 68,351.23 I
2,100.0000	SWIRE PROPERTIES LTD	3,862.12	2.9224	6,137.14	2,275.02 13.75 C 2,261.27 I
3,000.0000	TELEVISION BROADCASTS HKD0.05 (POST B/L CHANGE)	14,835.87	6.4964	19,489.44	4,653.57 42.40 C 4,611.17 I
9,000.0000	HANG LUNG PROPERTIES LTD	36,833.58	3.0837	27,753.59	9,079.99- 60.39 C 9,140.38- I
12,000.0000	BANK OF EAST ASIA HK\$2.50	44,768.66	4.1482	49,778.40	5,009.74 102.92 C 4,906.82 I



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9,000.0000	CLP HLDGS HKD5	65,287.50	8.2060	73,854.73	8,567.23 160.69 C 8,406.54 I
9,000.0000	CATHAY PACIFIC AIRWAYS HK\$0.20	19,108.85	1.8683	16,814.72	2,294.13- 36.58 C 2,330.71- I
6,000.0000	CHEUNG KONG(HLDGS) HK\$0.50	79,312.73	17.7411	106,446.81	27,134.08 231.62 C 26,902.46 I
3,000.0000	CHEUNG KONG INFRASTRUCTURE HLDGS HKD1	17,837.88	6.8964	20,689.39	2,851.51 40.24 C 2,811.27 I
4,400.0000	HONG KONG EXCHANGES & CLEARING HKD1	74,950.83	18.6443	82,035.00	7,084.17 178.49 C 6,905.68 I
20,000.0000	LI & FUNG HKD0.025	49,323.59	1.4812	29,624.47	19,699.12- 64.46 C 19,763.58- I
6,500.0000	MTR CORP HKD1	24,721.83	3.8514	25,034.35	312.52 54.47 C 258.05 I
4,000.0000	HANG LUNG GROUP LTD	21,704.61	5.4126	21,650.64	53.97- 47.11 C 101.08- I



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3,300.0000	HANG SENG BANK HK\$5	46,362.45	16.3347	53,904.66	7,542.21 117.29 C 7,424.92 I
6,139.0000	HENDERSON LAND DEVELOPMENT CO HK \$2	35,839.84	5.8513	35,921.43	81.59 77.83 C 3.76 I
6,000.0000	POWER ASSETS HOLDINGS LIMITED	35,939.52	8.7415	52,449.24	16,509.72 114.12 C 16,395.60 I
6,000.0000	WHARF HOLDINGS HK\$1	34,720.99	7.1996	43,198.05	8,477.06 94.00 C 8,383.06 I
27,377.0000	HONG KONG & CHINA GAS CO LTD	43,382.43	2.1882	59,908.77	16,526.34 130.34 C 16,396.00 I
10,000.0000	HUTCHISON WHAMPOA LTD	74,082.07	13.6768	136,768.02	62,685.95 297.58 C 62,388.37 I
13,000.0000	GALAXY ENTERTAINMENT GROUP LTD HKD0.10	40,096.82	7.9996	103,995.30	63,898.48 25.59 C 63,872.89 I
3,500.0000	KERRY PROPERTIES LTD ORD HKD1	19,228.79	3.4966	12,238.16	6,990.63- 26.63 C 7,017.26- I



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16,000.0000	BOC HONG KONG HLDG HKD5	38,613.39	2.8966	46,346.29	7,732.90 100.84 C 7,632.06 I
5,500.0000	YUE YUEN INDL HLDG HKD0.25	17,773.89	3.3482	18,415.30	641.41 40.07 C 601.34 I
10,331.0000	NEW WORLD DEVELOPMENT CO HK\$1	20,248.62	1.1380	11,756.81	8,491.81- 25.05 C 8,516.86- I
8,000.0000	SHANGRI-LA ASIA ORD HK\$1	15,907.40	1.5663	12,531.05	3,376.35- 27.27 C 3,403.62- I
8,800.0000	SINO LAND CO ORD HK\$1.00	15,897.10	1.6463	14,488.12	1,408.98- 31.52 C 1,440.50- I
9,000.0000	SUN HUNG KAI PROPERTIES HK\$0.50	130,007.93	13.7155	123,439.59	6,568.34- 202.03 C 6,770.37- I
3,000.0000	SWIRE PACIFIC A HKD0.60	36,741.70	12.3091	36,927.36	185.66 80.35 C 105.31 I
1,500.0000	WING HANG BANK HK\$1	14,087.28	16.1283	24,192.46	10,105.18 52.65 C 10,052.53 I



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5,000.0000	WHEELLOCK & CO LTD HKD0.50	15,302.14	4.1740	20,870.03	5,567.89 45.41 C 5,522.48 I
800.0000	SUNTORY BEVERAGE & FOOD LTD	27,237.03	39.2379	31,390.36	4,153.33 1,154.93- C 5,308.26 I
3,300.0000	SEVEN & I HLDG CO LTD NPV	81,478.41	42.1302	139,029.66	57,551.25 10,852.21- C 68,403.46 I
1,400.0000	BANDAI NAMCO HOLDINGS INC NPV	21,386.68	23.4144	32,780.22	11,393.54 2,751.56- C 14,145.10 I
5,000.0000	MITSUBISHI CHEMICAL HOLDINGS CORP NPV	25,872.25	4.4321	22,160.80	3,711.45- 1,729.81- C 1,981.64- I
2,800.0000	DAIICHI SANKYO COMPANY LIMITED NPV	52,080.93	18.6565	52,238.29	157.36 4,077.55- C 4,234.91 I
800.0000	SUMCO CORPORATION NPV	16,907.46	9.1604	7,328.36	9,579.10- 572.03- C 9,007.07- I
500.0000	ELECTRIC POWER DEVELOPMENT CO LTD	15,518.02	32.4761	16,238.09	720.07 1,267.50- C 1,987.57 I



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600.0000	SEGA SAMMY HLDGS INC NPV	7,244.22	19.6732	11,803.96	4,559.74 921.37- C 5,481.11 I
600.0000	DENA CO LTD NPV	14,841.94	13.5235	8,114.11	6,727.83- 633.36- C 6,094.47- I
1,000.0000	GUNGHO ONLINE ENTERTAINMENT NPV	12,538.10	6.4557	6,455.75	6,082.35- 74.78- C 6,007.57- I
1,000.0000	YAMAGUCHI FIANCIAL GROUP INC NPV	10,806.72	10.5424	10,542.42	264.30- 822.91- C 558.61 I
7,000.0000	AOZORA BANK NPV	21,587.77	3.2871	23,009.72	1,421.95 1,512.92- C 2,934.87 I
4,000.0000	FUKUOKA FINANCIAL GROUP INC NPV	17,077.81	4.8270	19,308.03	2,230.22 1,507.12- C 3,737.34 I
4,000.0000	INPEX CORPORATION	70,702.80	15.2016	60,806.47	9,896.33- 9,838.07- C 58.26- I
1,600.0000	isetan MITSUKOSHI HOLDINGS LTD NPV	17,529.25	13.0299	20,847.93	3,318.68 1,627.34- C 4,946.02 I



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2,300.0000	MS&AD INSURANCE GROUP HOLDINGS	62,567.18	24.1547	55,555.99	7,011.19- 4,336.53- C 2,674.66- I
3,000.0000	J FRONT RETAILING CO LTD NPV	18,142.52	7.0184	21,055.23	2,912.71 1,643.51- C 4,556.22 I
1,000.0000	SONY FINANCIAL HOLDINGS INC NPV	16,210.08	17.0574	17,057.40	847.32 1,331.45- C 2,178.77 I
2,400.0000	OTSUKA HOLDINGS CO LTD	68,677.49	30.9955	74,389.22	5,711.73 12,204.74- C 17,916.47 I
500.0000	MEIJI HOLDINGS CO LTD	19,510.65	66.2356	33,117.81	13,607.16 2,585.07- C 16,192.23 I
3,300.0000	DAI-ICHI LIFE INSURANCE CO LTD	48,327.55	14.8956	49,155.52	827.97 10,192.24- C 11,020.21 I
2,419.0000	NKSJ HOLDINGS INC	53,626.59	26.9285	65,140.24	11,513.65 16,329.72- C 27,843.37 I
8,112.0000	JX HOLDINGS INC	45,706.93	5.3501	43,400.66	2,306.27- 7,863.89- C 5,557.62 I



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1,300.0000	NEXON CO LTD	20,222.13	9.5454	12,409.06	7,813.07- 3,571.36- C 4,241.71- I
500.0000	JAPAN AIRLINES CO LTD	29,745.71	55.2786	27,639.31	2,106.40- 1,016.92- C 1,089.48- I
700.0000	NIPPON PAPER INDUSTRIES CO LTD	10,891.06	18.8144	13,170.13	2,279.07 1,136.11- C 3,415.18 I
900.0000	AISIN SEIKI CO Y50	26,686.74	39.7808	35,802.77	9,116.03 2,794.65- C 11,910.68 I
3,000.0000	AJINOMOTO CO INC Y50	29,769.06	15.6754	47,026.31	17,257.25 3,670.73- C 20,927.98 I
3,000.0000	AMADA Y50	25,712.53	10.1673	30,501.95	4,789.42 2,380.88- C 7,170.30 I
1,700.0000	ASAHI GROUP HOLDINGS LTD	31,620.56	31.3903	53,363.60	21,743.04 4,165.40- C 25,908.44 I
6,000.0000	ASAHI KASEI CORP JPY50	32,835.39	7.6501	45,900.99	13,065.60 3,582.88- C 16,648.48 I



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5,000.0000	ASAHI GLASS CO Y50	58,185.93	5.8930	29,465.48	28,720.45- 2,299.98- C 26,420.47- I
5,000.0000	HIROSHIMA BK Y50	21,187.56	4.7776	23,888.26	2,700.70 1,864.64- C 4,565.34 I
2,000.0000	BANK OF KYOTO Y50	18,227.69	9.0913	18,182.72	44.97- 1,419.28- C 1,374.31 I
6,300.0000	YAHOO JAPAN CORP NPV	23,510.21	4.6197	29,104.19	5,593.98 2,271.79- C 7,865.77 I
500.0000	BENESSE HOLDINGS INC JPY50	21,373.87	43.3838	21,691.92	318.05 1,693.20- C 2,011.25 I
1,000.0000	TREND MICRO INC JPY50	35,561.03	32.9203	32,920.39	2,640.64- 2,569.66- C 70.98- I
600.0000	NTT DATA CORP JPY5000	19,803.45	38.3988	23,039.34	3,235.89 1,798.38- C 5,034.27 I
6,600.0000	NTT DOCOMO INC	101,400.04	17.0968	112,839.44	11,439.40 8,807.90- C 20,247.30 I
2,700.0000	BRIDGESTONE CO Y50	45,075.20	34.9933	94,482.01	49,406.81 7,374.98- C 56,781.79 I



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1,500.0000	BROTHER INDUSTRIES LTD	18,190.42	17.3239	25,985.88	7,795.46 2,028.38- C 9,823.84 I
5,300.0000	CANON INC NPV	237,897.50	32.5354	172,437.69	65,459.81- 12,306.99- C 53,152.82- I
700.0000	CENTRAL JAPAN RY Y5000	53,139.24	142.6385	99,847.00	46,707.76 7,793.72- C 54,501.48 I
4,000.0000	CHIBA BANK Y50	23,891.90	7.0578	28,231.58	4,339.68 2,203.66- C 6,543.34 I
2,900.0000	CHUBU ELECTRIC PWR Y500	71,880.12	12.4278	36,040.67	35,839.45- 2,813.22- C 33,026.23- I
2,000.0000	CHUGOKU BANK Y50	27,000.83	15.3793	30,758.60	3,757.77 2,400.92- C 6,158.69 I
1,200.0000	CHUGOKU ELECTRIC POWER CO INC Y500	23,661.92	13.6419	16,370.37	7,291.55- 1,277.81- C 6,013.74- I
1,000.0000	CHUGAI PHARMACEUTL Y50	19,058.15	28.1822	28,182.22	9,124.07 2,199.80- C 11,323.87 I



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3,100.0000	RAKUTEN INC NPV	22,443.91	12.9213	40,056.27	17,612.36 3,126.66- C 20,739.02 I
2,600.0000	KDDI CORP Y5000	67,406.24	60.9940	158,584.47	91,178.23 12,378.58- C 103,556.81 I
1,000.0000	DAIHATSU MOTOR CO Y50	17,281.48	17.7779	17,778.00	496.52 5,700.04- C 6,196.56 I
400.0000	DAITO TRUST CONSTRUCTION Y50	19,398.86	117.5657	47,026.31	27,627.45 3,670.72- C 31,298.17 I
1,100.0000	DAIKIN INDUSTRIES Y50	46,261.27	63.0965	69,406.25	23,144.98 5,417.62- C 28,562.60 I
3,000.0000	DAI NIPPON PRINTING CO Y50	41,172.00	10.4437	31,331.13	9,840.87- 2,445.61- C 7,395.26- I
3,000.0000	DAIWA HOUSE INDUSTRY CO Y50	33,953.32	20.7294	62,188.44	28,235.12 4,854.22- C 33,089.34 I
8,000.0000	DAIWA SECS GROUP NPV	41,991.83	8.6570	69,256.21	27,264.38 5,405.92- C 32,670.30 I
500.0000	LAWSON INC NPV	21,373.87	75.0209	37,510.49	16,136.62 2,927.94- C 19,064.56 I



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5,000.0000	MITSUBISHI UFJ LEASE & FINANCE CO LTD	18,046.68	5.7450	28,725.14	10,678.46
					2,242.18- C 12,920.64 I
500.0000	DON QUIJOTE HOLDINGS CO. LTD	33,841.50	55.7721	27,886.09	5,955.41- 1,026.00- C 4,929.41- I
1,500.0000	EAST JAPAN RAILWAY CO Y50000	103,808.40	78.7621	118,143.23	14,334.83 9,221.90- C 23,556.73 I
1,100.0000	EISAI CO Y50	39,468.48	41.8932	46,082.62	6,614.14 3,597.06- C 10,211.20 I
920.0000	SBI HOLDINGS INC NPV	18,121.22	12.2402	11,261.04	6,860.18- 879.00- C 5,981.18- I
5,000.0000	DENKI KAGAKU KOGYO Y50	21,294.03	3.8398	19,199.45	2,094.58- 1,498.64- C 595.94- I
300.0000	FAST RETAILING CO LTD Y50	69,534.82	329.0064	98,701.94	29,167.12 5,673.43- C 34,840.55 I
60,700.0000	MITSUBISHI UFJ FINANCIAL GROUP NPV	321,293.89	6.1300	372,091.21	50,797.32 26,943.07- C 77,740.39 I



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4,000.0000	FUJI HEAVY LTD Y50	20,527.45	27.6886	110,754.65	90,227.20 8,645.19- C 98,872.39 I
2,000.0000	FUJIFILM HOLDINGS CORP NPV	69,950.89	27.8860	55,772.17	14,178.72- 4,353.40- C 9,825.32- I
1,000.0000	FANUC CORP	120,652.73	172.4495	172,449.53	51,796.80 11,417.63- C 63,214.43 I
8,000.0000	FUJITSU NPV	52,468.49	7.4922	59,937.81	7,469.32 4,678.56- C 12,147.88 I
4,000.0000	FURUKAWA ELECTRIC CO LTD	20,953.32	2.1223	8,489.22	12,464.10- 662.63- C 11,801.47- I
3,000.0000	TONEN GEN SEKIYU JPY50	25,329.24	9.4960	28,488.23	3,158.99 2,223.70- C 5,382.69 I
1,000.0000	MCDONALDS CO JAPAN JPY50	24,891.63	28.0835	28,083.51	3,191.88 6,455.76- C 9,647.64 I
800.0000	NOMURA RESEARCH INSTITUTE NPV	18,227.69	31.4890	25,191.25	6,963.56 1,966.35- C 8,929.91 I
6.0000	NIPPON BUILDING FUND INC	25,552.84	5,843.7391	35,062.43	9,509.59 2,736.87- C 12,246.46 I



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6.0000	JAPAN REAL ESTATE INVST CO JPY REAL ESTATE INV REIT	25,137.60	5,823.9967	34,943.98	9,806.38 2,727.62- C 12,534.00 I
4,000.0000	GUNMA BANK Y50	22,358.73	5.9128	23,651.35	1,292.62 1,846.15- C 3,138.77 I
800.0000	HAMAMATSU PHOTONICS NPV	29,817.38	49.0597	39,247.82	9,430.44 1,444.03- C 10,874.47 I
5,000.0000	HANKYU HANSHIN HOLDINGS INC	23,104.03	5.7055	28,527.71	5,423.68 2,226.80- C 7,650.48 I
700.0000	DENTSU INC NPV	18,595.01	40.7186	28,503.04	9,908.03 2,224.85- C 12,132.88 I
12,000.0000	RESONA HOLDINGS INC	76,620.93	5.8239	69,887.96	6,732.97- 7,145.13- C 412.16 I
3,000.0000	HINO MOTORS LTD Y50	29,867.27	13.7702	41,310.89	11,443.62 3,467.63- C 14,911.25 I
200.0000	HIROSE ELECTRONICS	23,444.73	148.5612	29,712.25	6,267.52 2,319.25- C 8,586.77 I



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500.0000	HISAMITSU PHARM CO NPV	18,765.37	44.7164	22,358.22	3,592.85 1,745.23- C 5,338.08 I
26,000.0000	HITACHI NPV	119,709.06	7.3244	190,434.82	70,725.76 12,080.81- C 82,806.57 I
2,000.0000	HITACHI METALS Y50	21,102.39	15.1423	30,284.78	9,182.39 2,363.95- C 11,546.34 I
800.0000	HITACHI CONSTRUCTION MACHINERY Y50	18,960.20	19.9200	15,936.03	3,024.17- 1,243.92- C 1,780.25- I
1,000.0000	HOKKAIDO ELE POWER CO INC Y500	18,962.33	7.7291	7,729.13	11,233.20- 603.32- C 10,629.88- I
13,940.0000	SUMITOMO MITSUI TRUST HOLDINGS INC	53,820.65	4.5703	63,710.77	9,890.12 4,973.06- C 14,863.18 I
900.0000	HOKURIKU ELEC PWR CO INC Y500	19,500.00	13.2569	11,931.30	7,568.70- 931.32- C 6,637.38- I
8,100.0000	HONDA MOTOR CO NPV	288,688.80	34.9143	282,806.37	5,882.43- 20,403.52- C 14,521.09 I



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1,800.0000	HOYA PENTAX HD CORPORATION	49,099.77	33.2263	59,807.51	10,707.74 4,668.39- C 15,376.13 I
600.0000	IBIDEN CO Y50	20,633.91	20.1372	12,082.33	8,551.58- 943.10- C 7,608.48- I
10,000.0000	IHI CORP Y50	18,206.40	4.6591	46,591.97	28,385.57 3,636.84- C 32,022.41 I
7,000.0000	ISUZU MOTORS LTD Y50	19,079.45	6.6136	46,295.84	27,216.39 3,613.70- C 30,830.09 I
7,000.0000	ITOCHU CORP Y50	62,082.74	12.8424	89,896.85	27,814.11 7,017.06- C 34,831.17 I
2,000.0000	IYO BANK LTD/THE	18,972.98	10.1080	20,216.18	1,243.20 1,578.01- C 2,821.21 I
2,000.0000	JAPAN STEEL WORKS Y50	23,125.32	4.3828	8,765.61	14,359.71- 684.22- C 13,675.49- I
900.0000	JSR CORP JPY50	18,762.17	17.1561	15,440.50	3,321.67- 1,205.24- C 2,116.43- I
1,000.0000	JGC CORP Y50	17,833.74	30.3834	30,383.50	12,549.76 2,371.62- C 14,921.38 I



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5,600.0000	JAPAN TOBACCO INC Y50000	127,833.14	36.4542	204,143.92	76,310.78 13,370.92- C 89,681.70 I
5,000.0000	JOYO BANK Y50	22,092.56	5.3304	26,652.19	4,559.63 2,080.40- C 6,640.03 I
2,800.0000	AEON CO LTD NPV	32,494.69	12.2994	34,438.58	1,943.89 2,688.16- C 4,632.05 I
8,000.0000	KAJIMA CORP Y50	19,760.86	4.4222	35,378.31	15,617.45 2,761.52- C 18,378.97 I
3,300.0000	KANSAI ELEC POWER NPV	74,767.59	9.4269	31,109.03	43,658.56- 2,428.27- C 41,230.29- I
3,000.0000	KAO CORP	83,734.73	39.3563	118,069.20	34,334.47 7,297.17- C 41,631.64 I
7,000.0000	KAWASAKI HEAVY INDUSTRIES Y50	19,228.51	3.8102	26,671.93	7,443.42 2,081.93- C 9,525.35 I
5,000.0000	KAWASAKI KISEN KAISHA Y50	20,335.80	2.0926	10,463.45	9,872.35- 816.75- C 9,055.60- I
3,000.0000	KEIKYU CORP	24,562.66	8.9827	26,948.32	2,385.66 2,103.51- C 4,489.17 I



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3,000.0000	KEIO CORP Y50	19,995.09	7.8574	23,572.38	3,577.29 1,839.98- C 5,417.27 I
2,000.0000	KIKKOMAN SHOYU CO Y50	23,529.90	20.8281	41,656.38	18,126.48 3,251.56- C 21,378.04 I
220.0000	KEYENCE CORP NPV	48,358.74	436.2568	95,976.51	47,617.77 7,491.62- C 55,109.39 I
7,000.0000	KINTETSU CORP Y50	21,687.96	3.6424	25,497.26	3,809.30 1,990.23- C 5,799.53 I
4,000.0000	KIRIN HOLDINGSCO LTD Y50	59,325.17	14.4415	57,766.15	1,559.02- 4,509.05- C 2,950.03 I
11,000.0000	KOBE STEEL	23,540.55	1.5004	16,504.61	7,035.94- 1,288.31- C 5,747.63- I
4,100.0000	KOMATSU Y50	86,170.55	23.2170	95,189.77	9,019.22 7,430.22- C 16,449.44 I
1,000.0000	KONAMI CO JPY50	19,409.50	22.1015	22,101.57	2,692.07 1,725.18- C 4,417.25 I
2,500.0000	KONICA MINOLTA INC	29,465.61	9.8810	24,702.63	4,762.98- 1,928.21- C 2,834.77- I



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1,600.0000	JTEKT CORP NPV	19,539.40	16.8501	26,960.17	7,420.77 2,104.43- C 9,525.20 I
5,000.0000	KUBOTA CORPORATION Y50	46,048.34	14.1750	70,875.08	24,826.74 5,532.29- C 30,359.03 I
1,500.0000	KURARAY CO Y50	20,170.77	12.6745	19,011.89	1,158.88- 1,484.02- C 325.14 I
700.0000	KURITA WATER INDUSTRIES NPV	19,712.94	23.1676	16,217.36	3,495.58- 1,265.88- C 2,229.70- I
1,400.0000	KYOCERA CORP Y50	69,982.82	47.4606	66,444.89	3,537.93- 5,186.48- C 1,648.55 I
2,000.0000	KYOWA HAKKO KIRIN CO LTD	21,017.20	13.5333	27,066.78	6,049.58 2,112.73- C 8,162.31 I
1,700.0000	KYUSHU ELECTRIC POWER CO INC Y500	36,561.85	11.2630	19,147.13	17,414.72- 1,494.56- C 15,920.16- I
3,200.0000	TOKIO MARINE HOLDINGS INC NPV	89,230.50	32.8907	105,250.48	16,019.98 8,215.52- C 24,235.50 I



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15.0000	JAPAN RETAIL FUND JAPAN RETAIL FUND INV RETT	30,564.87	2,248.6550	33,729.83	3,164.96 1,241.01- C 4,405.97 I
2,200.0000	JFE HOLDINGS INC NPV	88,774.81	20.6406	45,409.41	43,365.40- 3,544.51- C 39,820.89- I
600.0000	MAKITA CORP Y50	20,378.38	61.7935	37,076.16	16,697.78 2,894.03- C 19,591.81 I
6,300.0000	SUMITOMO MITSUI GR NPV	217,804.93	41.8932	263,927.74	46,122.81 18,851.36- C 64,974.17 I
8,000.0000	MARUBENI CORP Y50	50,253.91	7.3145	58,516.36	8,262.45 4,567.60- C 12,830.05 I
11,700.0000	PANASONIC CORP	160,682.93	12.1810	142,518.14	18,164.79- 9,953.88- C 8,210.91- I
118,100.0000	MIZUHO FINL GP NPV	217,353.13	2.0532	242,483.59	25,130.46 28,912.42- C 54,042.88 I
1,200.0000	CREDIT SAISON CO NPV	18,155.29	20.8084	24,970.14	6,814.85 1,949.10- C 8,763.95 I



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9,500.0000	SOJITZ CORPORATION NPV	18,408.68	1.7669	16,785.94	1,622.74- 1,310.26- C 312.48- I
6,000.0000	MITSUBISHI ESTATE CO LTD	97,995.12	24.6878	148,126.94	50,131.82 11,562.31- C 61,694.13 I
7,100.0000	MITSUBISHI CORP NPV	178,049.33	20.7985	147,669.91	30,379.42- 17,006.02- C 13,373.40- I
3,000.0000	MITSUBISHI GAS & CHEML CO Y50	18,270.28	6.3965	19,189.58	919.30 1,497.88- C 2,417.18 I
9,000.0000	MITSUBISHI ELECTRIC CORP Y50	82,407.89	12.3389	111,050.79	28,642.90 8,668.26- C 37,311.16 I
14,000.0000	MITSUBISHI HEAVY IND NPV	58,877.99	6.2385	87,340.21	28,462.22 6,817.50- C 35,279.72 I
7,000.0000	MITSUBISHI MATERIAL CORP Y50	20,197.38	3.5042	24,529.88	4,332.50 1,914.73- C 6,247.23 I
9,100.0000	mitsui & CO Y50	149,663.17	16.0307	145,880.26	3,782.91- 10,122.01- C 6,339.10 I
6,000.0000	mitsui CHEMICALS JPY50	18,461.93	2.7343	16,405.90	2,056.03- 1,280.60- C 775.43- I



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5,000.0000	MITSUI O.S.K. LINES JPY50	36,093.38	3.7214	18,607.18	17,486.20- 1,452.41- C 16,033.79- I
3,000.0000	MITSUI FUDOSAN CO Y50	51,520.90	33.7199	101,159.86	49,638.96 7,896.22- C 57,535.18 I
1,500.0000	MITSUBISHI MOTOR CORP Y50	20,282.56	11.0359	16,553.97	3,728.59- 1,292.15- C 2,436.44- I
900.0000	MURATA MANUFACTURING CO NPV	50,690.44	93.5886	84,229.80	33,539.36 6,574.73- C 40,114.09 I
1,100.0000	SEIKO EPSON CORP NPV	17,415.31	42.5447	46,799.27	29,383.96 3,652.99- C 33,036.95 I
2,000.0000	NGK INSULATORS Y50	39,327.51	22.7037	45,407.43	6,079.92 1,667.85- C 7,747.77 I
1,000.0000	N.G.K. SPARK PLUG CO NPV	13,596.23	28.2118	28,211.84	14,615.61 2,202.12- C 16,817.73 I
600.0000	NINTENDO CO	93,289.70	119.6880	71,812.84	21,476.86- 2,080.78- C 19,396.08- I
2,000.0000	DENSO CORPORATION NPV	59,303.88	47.7271	95,454.32	36,150.44 7,450.87- C 43,601.31 I



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1,000.0000	TAIYO NIPPON SANZO CORP NPV	9,550.37	8.8544	8,854.45	695.92- 691.15- C 4.77- I
800.0000	NIDEC CORP NPV	42,375.12	61.3592	49,087.41	6,712.29 3,831.61- C 10,543.90 I
1,000.0000	NH FOODS LTD	12,882.89	19.5350	19,535.07	6,652.18 1,524.85- C 8,177.03 I
1,100.0000	NISSHIN SEIFUN GROUP INC	13,074.53	11.9342	13,127.68	53.15 1,024.70- C 1,077.85 I
2,200.0000	NIPPON TEL & TEL CORP Y50000	92,639.67	62.3661	137,205.47	44,565.80 10,709.82- C 55,275.62 I
2,000.0000	NSK LTD ORD	15,906.64	13.0003	26,000.69	10,094.05 2,029.53- C 12,123.58 I
1,000.0000	NISSAN CHEMICAL INDUSTRIES Y50	14,192.47	15.5471	15,547.11	1,354.64 1,213.56- C 2,568.20 I
500.0000	NISSIN FOODS HOLDINGS CO LTD	16,662.57	51.4288	25,714.43	9,051.86 2,007.18- C 11,059.04 I
700.0000	NITTO DENKO CORP NPV	27,277.65	46.8584	32,800.95	5,523.30 2,560.33- C 8,083.63 I



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4,000.0000	NIPPON EXPRESS CO Y50	17,503.69	4.8467	19,387.00	1,883.31 1,513.29- C 3,396.60 I
2,600.0000	NIKON CORP NPV	52,439.05	15.7445	40,935.79	11,503.26- 2,209.25- C 9,294.01- I
1,400.0000	YAMAHA CORP Y50	18,378.87	15.8037	22,125.27	3,746.40 1,727.02- C 5,473.42 I
2,000.0000	MINEBEA CO LTD Y50	12,329.24	11.2334	22,466.81	10,137.57 1,753.68- C 11,891.25 I
39,290.0000	NIPPON STEEL & SUMITOMO METAL NPV	131,632.56	3.1982	125,659.74	5,972.82- 12,406.21- C 6,433.39 I
1,000.0000	NIPPON ELECTRIC GLASS Y50	14,171.17	5.8239	5,824.00	8,347.17- 454.60- C 7,892.57- I
13,600.0000	NISSAN MOTOR CO Y50	122,748.75	9.4862	129,012.39	6,263.64 8,686.45- C 14,950.09 I
15,800.0000	NOMURA HOLDING NPV	115,905.53	7.0776	111,826.66	4,078.87- 8,728.83- C 4,649.96 I



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6,000.0000	NIPPON YUSEN KK Y50	23,891.90	2.8823	17,294.31	6,597.59- 1,349.94- C 5,247.65- I
400.0000	NITORI HOLDINGS CO LTD	15,118.77	54.6863	21,874.54	6,755.77 1,707.47- C 8,463.24 I
200.0000	ORIENTAL LAND CO JPY50	13,841.12	171.3143	34,262.87	20,421.75 2,674.45- C 23,096.20 I
3,000.0000	NTN CORP Y50	13,574.94	4.3630	13,089.19	485.75- 1,021.70- C 535.95 I
2,000.0000	ODAKYU ELECTRIC RAILWAY CO Y50	16,524.17	9.6244	19,248.80	2,724.63 1,502.51- C 4,227.14 I
3,000.0000	OBAYASHI CORP Y50	13,255.53	7.1368	21,410.59	8,155.06 1,671.25- C 9,826.31 I
4,000.0000	OJI HOLDINGS CORP JPY50	17,674.04	4.1162	16,465.13	1,208.91- 1,285.21- C 76.30 I
1,000.0000	OLYMPUS CORP Y50	28,433.99	34.4504	34,450.42	6,016.43 7,648.49- C 13,664.92 I
800.0000	OMRON CORP Y50	18,457.66	42.1499	33,719.95	15,262.29 2,632.08- C 17,894.37 I



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400.0000	ONO PHARMACEUTICAL CO Y50	17,503.69	88.0509	35,220.37	17,716.68 2,749.19- C 20,465.87 I
7,000.0000	TAIHEIYO CEMENT CORP Y50	30,247.44	4.0274	28,192.09	2,055.35- 1,037.27- C 1,018.08- I
6,200.0000	ORIX CORP Y50	69,718.08	16.5737	102,757.02	33,038.94 6,104.61- C 39,143.55 I
8,000.0000	OSAKA GAS CO Y50	28,363.64	4.2051	33,640.98	5,277.34 2,625.90- C 7,903.24 I
8,000.0000	HOKUHOKU FINANCIAL GROUP INC NPV	17,546.28	2.1321	17,057.40	488.88- 1,331.45- C 842.57 I
20.0000	UNITED URBAN INVES UNITED URBAN INVEST REIT	30,554.62	1,613.9380	32,278.76	1,724.14 1,187.62- C 2,911.76 I
10,000.0000	SHINSEI BK NPV	21,022.54	2.2506	22,506.29	1,483.75 637.40- C 2,121.15 I
2,000.0000	RICOH Y50	32,132.69	11.9145	23,829.03	8,303.66- 1,860.02- C 6,443.64- I



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400.0000	RINNAI CORP	30,923.24	96.5401	38,616.06	7,692.82 1,420.78- C 9,113.60 I
1,000.0000	JAPAN EXCHANGE GROUP INC	24,629.90	24.6285	24,628.60	1.30- 984.78- C 983.48 I
2,000.0000	GS YUASA CORP NPV	13,308.77	6.3669	12,733.82	574.95- 993.97- C 419.02 I
2,400.0000	T&D HOLDINGS INC NPV	28,363.64	13.5926	32,622.28	4,258.64 2,546.38- C 6,805.02 I
500.0000	ROHM CO Y50	37,211.31	57.3515	28,675.78	8,535.53- 2,238.34- C 6,297.19- I
200.0000	SMC CORP NPV	27,128.60	267.6077	53,521.54	26,392.94 4,177.74- C 30,570.68 I
4,700.0000	SOFTBANK CORPORATION NPV	154,537.88	74.4583	349,954.10	195,416.22 30,666.77- C 226,082.99 I
300.0000	SANKYO CO(OTC) NPV	14,485.26	38.4482	11,534.47	2,950.79- 900.35- C 2,050.44- I
500.0000	SANTEN PHARMACEUTICAL CO	15,038.90	56.2657	28,132.87	13,093.97 2,195.95- C 15,289.92 I



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900.0000	SECOM CO Y50	39,670.78	61.1026	54,992.35	15,321.57 4,292.53- C 19,614.10 I
2,000.0000	SEKISUI CHEMICAL Y50	13,670.77	11.5788	23,157.79	9,487.02 1,807.63- C 11,294.65 I
2,000.0000	SEKISUI HOUSE NPV	19,888.62	13.7110	27,422.14	7,533.52 2,140.48- C 9,674.00 I
4,000.0000	SHARP CORP Y50	50,126.15	3.2081	12,832.54	37,293.61- 1,001.66- C 36,291.95- I
300.0000	SHIMAMURA NPV	33,145.22	98.3169	29,495.09	3,650.13- 1,085.20- C 2,564.93- I
700.0000	SHIKOKU ELECTRIC POWER CO INC Y500	19,444.65	13.9578	9,770.49	9,674.16- 762.66- C 8,911.50- I
4,000.0000	SHIMIZU CORPORATION Y50	16,694.52	7.0776	28,310.55	11,616.03 2,209.83- C 13,825.86 I
2,200.0000	SHIN-ETSU CHEMICALS CO NPV	128,353.56	60.7867	133,730.81	5,377.25 9,186.20- C 14,563.45 I



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1,000.0000	SHIONOGI & CO JPY50	19,058.15	20.8676	20,867.68	1,809.53 1,628.85- C 3,438.38 I
400.0000	SHIMANO INC NPV	17,801.81	110.9520	44,380.83	26,579.02 3,464.23- C 30,043.25 I
2,000.0000	SHISEIDO Y50	41,145.24	18.2320	36,464.14	4,681.10- 6,571.14- C 1,890.04 I
1,800.0000	HULIC CO LTD	30,245.39	13.1780	23,720.45	6,524.94- 872.73- C 5,652.21- I
2,000.0000	SHIZUOKA BANK Y50	17,375.92	10.8089	21,617.89	4,241.97 1,687.41- C 5,929.38 I
7,000.0000	SHOWA DENKO KK Y50	15,800.17	1.4214	9,950.15	5,850.02- 776.68- C 5,073.34- I
5,200.0000	SONY CORP NPV	156,230.53	16.6033	86,337.30	69,893.23- 5,485.47- C 64,407.76- I
900.0000	STANLEY ELECTRIC CO NPV	17,315.24	26.0697	23,462.81	6,147.57 1,831.43- C 7,979.00 I
6,000.0000	SUMITOMO CHEMICAL Y50	29,385.77	3.7806	22,683.97	6,701.80- 1,770.65- C 4,931.15- I



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3,200.0000	SUMITOMO ELECTRIC IND NPV	39,930.56	14.0664	45,012.59	5,082.03 3,513.53- C 8,595.56 I
2,000.0000	SUMITOMO HEAVY INDUSTRIES Y50	12,095.00	4.7579	9,515.82	2,579.18- 742.77- C 1,836.41- I
2,000.0000	SUMITOMO METAL MNG NPV	30,386.58	16.2380	32,476.19	2,089.61 2,534.98- C 4,624.59 I
2,000.0000	SUMITOMO REALTY & DEV CO NPV	68,770.15	42.9100	85,820.05	17,049.90 2,895.64- C 19,945.54 I
4,800.0000	SUMITOMO CORP NPV	56,114.02	13.5037	64,818.12	8,704.10 5,059.49- C 13,763.59 I
2,000.0000	SURUGA BANK LTD Y50	17,950.87	19.4067	38,813.48	20,862.61 3,029.67- C 23,892.28 I
1,500.0000	SUZUKI MOTOR CO NPV	33,410.34	31.3212	46,981.89	13,571.55 3,667.26- C 17,238.81 I
500.0000	SUZUKEN CO LTD Y50	17,514.34	37.2143	18,607.18	1,092.84 1,452.42- C 2,545.26 I
800.0000	THK CO Y50	17,461.11	23.5723	18,857.90	1,396.79 1,472.00- C 2,868.79 I



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500.0000	TDK CORP	33,538.10	46.8881	23,444.05	10,094.05- 1,829.98- C 8,264.07- I
8,000.0000	TAISEI CORP Y50	17,631.46	5.5377	44,301.86	26,670.40 3,458.07- C 30,128.47 I
2,000.0000	TAKASHIMAYA CO	16,843.58	9.7033	19,406.74	2,563.16 1,514.83- C 4,077.99 I
3,800.0000	TAKEDA PHARMACEUTICAL CO LTD NPV	169,960.52	46.3846	176,261.78	6,301.26 12,495.68- C 18,796.94 I
1,000.0000	mitsubishi tanabe pharm corp NPV	14,181.83	14.9745	14,974.58	792.75 1,168.88- C 1,961.63 I
5,000.0000	TEIJIN Y50	16,875.51	2.5072	12,536.40	4,339.11- 978.55- C 3,360.56- I
1,400.0000	SYSMEX CORP JPY50	27,661.54	37.5598	52,583.78	24,922.24 14,103.75- C 39,025.99 I
1,400.0000	TERUMO CORP Y50	38,009.85	22.3582	31,301.51	6,708.34- 2,443.31- C 4,265.03- I



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3,000.0000	TOBU RAILWAY CO Y50	16,545.46	5.2317	15,695.18	850.28- 1,225.11- C 374.83 I
1,100.0000	TOHO CO Y500	17,579.28	23.4539	25,799.32	8,220.04 2,013.81- C 10,233.85 I
3,000.0000	TOHO GAS Y50	18,246.09	5.4982	16,494.74	1,751.35- 4,193.63- C 2,442.28 I
1,800.0000	TOHOKU ELEC PWR Y500	37,486.01	11.7368	21,126.30	16,359.71- 1,649.06- C 14,710.65- I
8,100.0000	TOKYO ELECTRIC PWR CO NPV	30,097.13	4.1656	33,741.67	3,644.54 334.72 C 3,309.82 I
4,000.0000	TOKYO TATEMONO CO Y50	38,295.67	9.2492	36,997.19	1,298.48- 1,361.22- C 62.74 I
9,000.0000	TOKYO GAS CO NPV	39,670.78	5.8437	52,593.65	12,922.87 4,105.30- C 17,028.17 I
700.0000	TOKYO ELECTRON NPV	47,475.03	67.5978	47,318.49	156.54- 3,693.53- C 3,536.99 I
4,000.0000	TOKYU CORP NPV	16,609.34	7.0875	28,350.03	11,740.69 2,212.91- C 13,953.60 I



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2,000.0000	TOPPAN PRINTING Y50	17,823.11	7.7390	15,478.01	2,345.10- 1,208.17- C 1,136.93- I
10,000.0000	TORAY INDUSTRIES INC Y50	60,866.05	6.5742	65,742.07	4,876.02 3,695.01- C 8,571.03 I
17,000.0000	TOSHIBA CORP NPV	88,146.63	4.6690	79,374.17	8,772.46- 6,195.69- C 2,576.77- I
1,000.0000	LIXIL GROUP CORPORATION	20,484.86	26.9878	26,987.81	6,502.95 2,106.59- C 8,609.54 I
1,000.0000	TOYO SEIKAN GROUP HOLDINGS LTD	17,929.57	15.3595	15,359.56	2,570.01- 1,198.91- C 1,371.10- I
12,000.0000	MAZDA MOTOR CORP NPV	37,276.90	4.6888	56,265.73	18,988.83 1,759.44- C 20,748.27 I
700.0000	TOYOTA INDUSTRIES CORP Y50	19,884.36	51.6262	36,138.39	16,254.03 2,820.86- C 19,074.89 I
600.0000	TOYODA GOSEI Y50	16,615.73	20.7689	12,461.38	4,154.35- 972.70- C 3,181.65- I
1,100.0000	TOYOTA TSUSHU CORP Y50	17,462.17	28.7547	31,630.23	14,168.06 2,468.95- C 16,637.01 I



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13,100.0000	TOYOTA MOTOR CORP NPV	542,884.78	60.0562	786,737.07	243,852.29 63,377.36- C 307,229.65 I
6,000.0000	UBE INDUSTRIES LTD/JAPAN Y50	15,651.11	1.7373	10,423.97	5,227.14- 813.66- C 4,413.48- I
800.0000	UNICHARM CORP	36,961.52	59.5923	47,673.86	10,712.34 9,659.09- C 20,371.43 I
1,100.0000	WEST JAPAN RAILWAY CO JPY50000	43,723.37	44.0254	48,428.01	4,704.64 2,552.76- C 7,257.40 I
600.0000	YAKULT HONSHA Y50	15,874.70	50.6391	30,383.50	14,508.80 2,371.65- C 16,880.45 I
1,100.0000	YAMAHA MOTOR CO Y50	16,220.72	17.2054	18,926.02	2,705.30 1,477.30- C 4,182.60 I
9,500.0000	ASTELLAS PHARMA INC Y50	69,083.15	13.1385	124,816.15	55,733.00 9,742.75- C 65,475.75 I
2,872.0000	YAMATO HOLDINGS CO LTD NPV	42,065.90	20.7196	59,506.72	17,440.82 11,995.94- C 29,436.76 I
1,000.0000	YASKAWA ELECTRIC MFG Y50	9,294.84	12.1119	12,111.94	2,817.10 945.42- C 3,762.52 I



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5,000.0000	BANK OF YOKOHAMA Y50	24,488.14	5.7548	28,774.49	4,286.35 2,246.06- C 6,532.41 I
11,000.0000	OVERSEA-CHINESE BKG CORP SGD0.5 (POST SUBDIVISION)	69,890.37	7.6605	84,265.83	14,375.46 9,085.13 C 5,290.33 I
12,363.0000	NOBLE GROUP HKD0.25	17,535.27	1.0989	13,586.26	3,949.01- 1,464.80 C 5,413.81- I
6,000.0000	SINGAPORE PRESS HLDGS SGD0.20	16,417.82	3.3449	20,069.79	3,651.97 2,163.84 C 1,488.13 I
46,000.0000	SINGAPORE TELECOMMUNICATIONS SGD0.15 (POST RE-ORGANIZATION)	114,135.62	3.0882	142,060.72	27,925.10 10,868.76 C 17,056.34 I
6,000.0000	SEBMCORP INDUSTRIES SGD0.25 (POST REORGANIZATION)	18,394.84	4.3075	25,845.27	7,450.43 2,786.51 C 4,663.92 I
5,500.0000	KEPPEL CORP NPV	33,809.83	8.6551	47,603.58	13,793.75 5,132.39 C 8,661.36 I
1,540.0000	KEPPEL REIT	1,657.70	1.0267	1,581.20	76.50- 5.64 C 82.14- I



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15,000.0000	WILMAR INTERNATIONAL LTD SGD0.5	52,604.37	2.5588	38,382.87	14,221.50-
					1,935.69 C 16,157.19- I
22,000.0000	GLOBAL LOGISTIC PROPERTIES LTD	35,174.96	2.1658	47,647.70	12,472.74
					294.18- C 12,766.92 I
1,000.0000	KEPPEL INFRASTRUCTURE TRUST	650.48	0.8382	838.25	187.77
					82.97 C 104.80 I
8,000.0000	SINGAPORE TECHNOLOGIES ENGINEERING SGD0.10	18,681.36	3.0481	24,385.35	5,703.99
					2,629.11 C 3,074.88 I
8,000.0000	DBS HLDGS SGD1	83,435.79	13.4360	107,488.07	24,052.28
					11,588.84 C 12,463.44 I
3,000.0000	CITY DEVELOPMENTS SGD0.50	23,337.39	8.2059	24,617.98	1,280.59
					2,654.18 C 1,373.59- I
6,000.0000	SEMBCORP MARINE SGD0.10	18,437.82	3.2888	19,732.88	1,295.06
					2,127.50 C 832.44- I
1,000.0000	JARDINE CYCLE & CARRIAGE LTD	22,406.17	35.5031	35,503.15	13,096.98
					3,827.78 C 9,269.20 I



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4,000.0000	SINGAPORE EXCHANGE SGD0.01	22,148.30	5.5749	22,299.76	151.46 2,404.25 C 2,252.79- I
11,000.0000	CAPITALAND SGD1	31,832.81	2.5668	28,235.67	3,597.14- 3,044.24 C 6,641.38- I
28,000.0000	GENTING SINGAPORE PLC USD0.10 CLOB	17,850.45	1.0668	29,872.06	12,021.61 3,220.66 C 8,800.95 I
14,000.0000	CAPITAMALL TRUST SGD1 UNITS	18,031.42	1.5842	22,179.44	4,148.02 2,392.99 C 1,755.03 I
12,000.0000	ASCENDAS REAL ESTATE INV TRUST NPV(REAL ESTATE INV TRUSTS)	21,019.62	1.8449	22,139.33	1,119.71 380.53 C 739.18 I
15,000.0000	COMFORTDELGRO CORP SGD0.25	16,761.65	2.0053	30,080.62	13,318.97 3,243.16 C 10,075.81 I
2,000.0000	SINGAPORE AIRLINES SGD0.50 (1000 BOARD LOT)	22,234.27	8.3182	16,636.59	5,597.68- 1,793.68 C 7,391.36- I
7,000.0000	KEPPEL LD STK SG\$0.50	25,040.77	2.7112	18,978.86	6,061.91- 117.19- C 5,944.72- I



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6,000.0000	UNITED OVERSEAS BANK SG\$1	87,183.16	18.0644	108,386.48	21,203.32 9,523.86 C 11,679.46 I
5,909.0000	BANK HAPOALIM B.M. ILS1	27,081.23	5.7863	34,191.63	7,110.40 2,286.74 C 4,823.66 I
6,726.0000	BANK LEUMI LE ISRAEL B M ORD ILS1	29,229.72	3.9052	26,266.46	2,963.26- 2,320.40 C 5,283.66- I
13,053.0000	BEZEQ-ISRAELI TELECOMMUNICATNS CORP SHK1	28,463.38	1.8753	24,478.54	3,984.84- 2,199.10 C 6,183.94- I
106.0000	DELEK GROUP ILS1	28,531.01	414.1450	43,899.38	15,368.37 215.51- C 15,583.88 I
1,859.0000	ISRAEL CHEMICALS LTD	24,454.23	8.5745	15,940.09	8,514.14- 1,408.16 C 9,922.30- I
701.0000	NICE SYSTEMS SHK1	20,040.22	40.8895	28,663.57	8,623.35 2,455.52 C 6,167.83 I
59.0000	PROTHENA CORP PLC	345.41	22.5500	1,330.45	985.04 I
187.0000	PERRIGO CO PLC	29,087.85	145.7600	27,257.12	1,830.73-I



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1,715.0000	TRANSOCEAN LTD	74,121.98	45.0300	77,226.45	3,104.47 I
193.0000	MELLANOX TECHNOLOGIES LTD	19,411.52	34.8600	6,727.98	12,683.54-I
9,250.0000	NOVO NORDISK A/S-B	147,187.48	46.0221	425,705.21	278,517.73 8,943.41 C 269,574.32 I
1,000.0000	DSV DKK1 (POST SUBDIVISION)	18,674.67	32.5975	32,597.52	13,922.85 1,044.21 C 12,878.64 I
454.0000	PANDORA A/S	33,226.86	76.6730	34,809.56	1,582.70 27.83- C 1,610.53 I
1,000.0000	NOVOZYMES A/S	26,215.68	50.1542	50,154.26	23,938.58 1,606.61 C 22,331.97 I
750.0000	COLOPLAST-B	21,318.35	90.4282	67,821.20	46,502.85 1,932.42 C 44,570.43 I
650.0000	CARLSBERG A/S	61,642.89	107.7095	70,011.20	8,368.31 723.64 C 7,644.67 I
37.0000	A P MOLLER - MAERSK A/S DNKR1000	73,965.31	2,484.7572	91,936.02	17,970.71 1,783.85 C 16,186.86 I



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15.0000	AP MOLLER MAERSK A/S	23,775.04	2,352.5306	35,287.96	11,512.92 1,666.79 C 9,846.13 I
2,700.0000	DANSKE BANK AS DKK10	64,617.94	28.2634	76,311.25	11,693.31 912.94 C 10,780.37 I
2,854.0000	TDC A/S DKK5	20,156.89	10.3485	29,534.80	9,377.91 1,531.02 C 7,846.89 I
800.0000	VESTAS WIND SYSTEM DKK1	48,315.46	50.4481	40,358.48	7,956.98- 1,456.36 C 9,413.34- I
549.0000	VALMET CORP	4,171.60	11.9663	6,569.54	2,397.94 73.91 C 2,324.03 I
1,035.0000	NESTE OIL OYJ EUR3.4	18,307.92	19.5103	20,193.25	1,885.33 227.14 C 1,658.19 I
694.0000	NOKIAN RENKAAT OYJ (NOKIA TYRE NPV	18,047.47	39.0207	27,080.42	9,032.95 304.59 C 8,728.36 I
1,532.0000	KONE CORPORATION NPV ORD B	46,681.67	41.7316	63,932.95	17,251.28 1,004.63 C 16,246.65 I



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1,119.0000	ORION OYJ NPV	30,466.09	37.2819	41,718.51	11,252.42 286.41- C 11,538.83 I
457.0000	KESKO OYJ EUR2 SER'B'	17,894.52	39.5273	18,064.00	169.48 203.17 C 33.69- I
720.0000	WARTSILA 'B'EUR3.5	18,738.23	49.5906	35,705.24	16,967.01 401.60 C 16,565.41 I
2,231.0000	UPM-KYMMENE OY NPV	30,156.83	17.0869	38,121.08	7,964.25 428.78 C 7,535.47 I
2,707.0000	STORA ENSO OYJ SER 'R' NPV	20,055.39	9.7346	26,351.72	6,296.33 296.40 C 5,999.93 I
1,803.0000	SAMPO OYJ SER'A'NPV	49,011.57	50.5900	91,213.94	42,202.37 1,025.97 C 41,176.40 I
1,906.0000	FORTUM OYJ FIM20	47,242.14	26.8490	51,174.25	3,932.11 575.60 C 3,356.51 I
549.0000	METSO OYJ EUR1.70	14,536.88	37.8843	20,798.52	6,261.64 233.93 C 6,027.71 I
16,067.0000	NOKIA (AB) OY EUR0.06	254,392.83	7.5714	121,649.68	132,743.15- 1,368.30 C 134,111.45- I



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1,800.0000	SEADRILL LTD USD2	50,035.70	39.6493	71,368.74	21,333.04 3,172.42- C 24,505.46 I
1,350.0000	AKER SOLUTIONS NOK1.66 (POST SUBDIVISION)	17,288.57	17.3720	23,452.24	6,163.67 700.83- C 6,864.50 I
2,200.0000	ORKLA ASA NOK1.25 (POST SUBDIVISION)	20,638.40	8.9060	19,593.24	1,045.16- 448.09- C 597.07- I
3,700.0000	NORSK HYDRO ASA NOK3.6666	20,962.61	5.3501	19,795.48	1,167.13- 591.55- C 575.58- I
1,596.0000	GJENSIDIGE FORSIKRING ASA	29,943.94	17.9261	28,610.07	1,333.87- 1,183.48- C 150.39- I
1,350.0000	KVAERNER ASA	2,490.12	2.0533	2,772.03	281.91 82.83- C 364.74 I
4,100.0000	DNB ASA	52,598.77	18.2846	74,967.00	22,368.23 2,240.23- C 24,608.46 I
3,500.0000	TELENOR ASA	56,890.76	22.7661	79,681.57	22,790.81 2,381.11- C 25,171.92 I



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800.0000	SUBSEA 7 SA	20,074.89	18.6431	14,914.53	5,160.36- 1,901.73- C 3,258.63- I
4,750.0000	STATOIL ASA NOK2.50	114,453.12	30.7025	145,837.07	31,383.95 6,309.45- C 37,693.40 I
700.0000	YARA INTL NOK1.70	28,210.30	50.0790	35,055.33	6,845.03 1,047.56- C 7,892.59 I
1,203.0000	ELEKTA SER B NPV	20,471.59	12.7143	15,295.38	5,176.21- 233.33- C 4,942.88- I
900.0000	KINNEVIK INVESTMENT AB SEK0.1	17,003.48	42.6006	38,340.55	21,337.07 2,619.73 C 18,717.34 I
325.0000	MILLICOM INTL CELL SDR EACH REP 1 USD1.50	29,545.20	91.5434	29,751.62	206.42 2,032.87 C 1,826.45- I
1,000.0000	ELECTROLUX AB SER 'B' NPV	22,922.28	25.2791	25,279.16	2,356.88 1,727.28 C 629.60 I
3,793.0000	ATLAS COPCO AB SER A NPV (POST SPLIT)	71,501.39	28.8840	109,557.21	38,055.82 2,532.78 C 35,523.04 I



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1,600.0000	ATLAS COPCO AB SER'B'NPV (POST SPLIT)	22,236.81	26.7001	42,720.28	20,483.47
					2,919.02 C 17,564.45 I
8,229.0000	VOLVO (AB) SER B NPV (POST SPLIT)	94,244.49	13.7689	113,304.38	19,059.89
					3,322.44 C 15,737.45 I
1,600.0000	SKF AB SER B NPV (POST SPLIT)	28,889.87	25.5035	40,805.64	11,915.77
					2,788.18 C 9,127.59 I
6,297.0000	SANDVIK AB NPV (POST SPLIT)	84,514.07	13.6567	85,996.41	1,482.34
					2,486.64 C 1,004.30- I
2,400.0000	SVENSKA CELLULOOSA AB-SCA SER B NPV (POST SPLIT)	33,864.72	26.0420	62,500.84	28,636.12
					4,270.59 C 24,365.53 I
1,900.0000	BOLIDEN AB NPV (POST SPLIT)	29,299.44	14.5018	27,553.53	1,745.91-
					81.44- C 1,664.47- I
900.0000	HEXAGON AB	18,565.30	32.2197	28,997.73	10,432.43
					730.64 C 9,701.79 I
2,500.0000	HUSQVARNA AB SER B NPV	18,213.03	7.7707	19,426.81	1,213.78
					1,327.40 C 113.62- I



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800.0000	RATOS AB SER B NPV	13,496.82	9.2440	7,395.27	6,101.55- 505.30 C 6,606.85- I
1,000.0000	SSAB AB NPV	18,390.80	9.2964	9,296.45	9,094.35- 635.21 C 9,729.56- I
456.0000	ETRION CORP	253.98	0.5205	237.37	16.61- 0.29 C 16.90- I
1,300.0000	TELE2 AB-B SHS	16,527.64	11.7720	15,303.61	1,224.03- 1,045.67 C 2,269.70- I
6,600.0000	SKANDINAVISKA ENSKILDA BANKEN SER A SWKR10	42,883.05	13.3575	88,159.93	45,276.88 6,023.82 C 39,253.06 I
3,800.0000	SWEDBANK AB SEK'A' NPV	47,269.60	26.5057	100,721.73	53,452.13 1,350.96 C 52,101.17 I
1,200.0000	SWEDISH MATCH AB NPV	28,861.98	34.7027	41,643.29	12,781.31 2,845.42 C 9,935.89 I
12,800.0000	NORDEA BANK AB EURO.39632	131,175.63	14.1054	180,550.01	49,374.38 12,336.68 C 37,037.70 I



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1,800.0000	SECURITAS SER 'B' SEK1	19,362.63	11.8542	21,337.70	1,975.07 1,457.97 C 517.10 I
3,043.0000	INVESTOR AB SEK 6.25 'B'	71,722.11	37.4999	114,112.22	42,390.11 3,792.13 C 38,597.98 I
4,400.0000	HENNES & MAURITZ AB	146,348.39	43.6775	192,181.41	45,833.02 13,131.43 C 32,701.59 I
1,400.0000	ASSA ABLOY SER B NPV	27,660.10	50.8574	71,200.46	43,540.36 4,865.00 C 38,675.36 I
2,760.0000	SVENSKA HANDELSBANKEN SER A NPV	93,111.04	48.9278	135,040.95	41,929.91 4,197.06 C 37,732.85 I
15,892.0000	ERICSSON (L.M.) TELEFONAKTIEBOLAGET SEK1 SER B	174,393.32	12.0786	191,953.90	17,560.58 8,769.79 C 8,790.79 I
13,599.0000	TELIASONERA AB NPV	103,625.02	7.3010	99,286.83	4,338.19- 3,454.84 C 7,793.03- I
1,600.0000	SKANSKA AB B SER 'B' SEK3	29,626.06	22.8110	36,497.72	6,871.66 2,493.83 C 4,377.83 I



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800.0000	LUNDIN PETROLEUM A ORD	20,416.51	20.2233	16,178.66	4,237.85- 556.16 C 4,794.01- I
1,250.0000	ALFA LAVAL AB ORD NPV	18,788.18	25.7578	32,197.27	13,409.09 2,199.98 C 11,209.11 I
1,000.0000	GETINGE AB SER'B'NPV	23,639.44	26.2663	26,266.39	2,626.95 1,464.28 C 1,162.67 I
4,213.0000	TEVA PHARMACEUTICAL INDUSTRIES ADR	211,507.48	52.4200	220,845.46	9,337.98 I
TOTAL INVESTMENTS EQUITY		53,980,887.78		65,293,713.22	11,312,825.44 1,541,472.69 C 9,771,352.75 I
TOTAL INVESTMENT		54,414,993.62		65,905,135.03	11,490,141.41 1,545,858.65 C 9,944,282.76 I



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<u>INVESTMENTS REAL ESTATE</u>					
654.5030	PRIME PROPERTY FUND LLC	6,706,631.33	15,091.4999	9,877,432.00	3,170,800.67
1,536,745.0000	FORTRESS JAPAN OPPORTUNITY DOMESTIC FUND © LP	681,070.00	0.5940	912,978.67	231,908.67
621,903.0000	BRAZIL REAL ESTATE OPPORTUNITIES FUND I I	605,208.79	0.8232	511,954.28	93,254.51-
1,584,946.1200	BROOKFIELD REAL ESTATE FUND	740,611.09	0.5922	938,719.21	198,108.12
1,830,344.9540	EXETER INDUSTRIAL VALUE FUND I I LPP	1,324,832.16	0.8853	1,620,457.47	295,625.31
1,594,075.4400	DIVCOWEST FUND I I I	1,386,791.44	1.2466	1,987,295.59	600,504.15
3,250,000.0000	JAMESTOWN PREMIER PROPERTY	3,250,000.00	1.4742	4,791,263.75	1,541,263.75
1,532,700.0000	BROOKFIELD FAIRFIELD MULTIFAMILY	1,350,807.00	1.1058	1,694,874.99	344,067.99
8,125,000.0000	HEITMAN AMERICA RE TRUST	7,642,518.00	1.1086	9,008,065.63	1,365,547.63
386,838.0000	CVI EUROPE REAL ESTATE PARTNER TG LLC	386,838.00	1.0635	411,429.29	24,591.29
650,000.0000	SAVANNA REAL ESTATE FUND I I A LP LLC	650,000.00	0.9594	623,649.00	26,351.00-
3,844,657.2000	USAA EAGLE REAL ESTATE LP	3,790,785.20	1.1237	4,320,279.74	529,494.54



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7,150,000.0000	PRISA REAL ESTATE LP	7,150,000.00	1.0315	7,375,918.55	225,918.55
90,167.7100	NORTHLIGHT REAL ESTATE OPPORTUNITY FUND	90,167.71	1.0000	90,167.71	0.00
6,500,000.0000	UBS TRUMBULL PROPERTY FUND	6,127,425.06	1.0878	7,071,317.50	943,892.44
1,477,960.7480	TTG BRPTP FUND LP	1,358,426.79	2.0357	3,008,770.42	1,650,343.63
776,100.2600	CITIC CAPITAL CHINA	424,135.38	0.5478	425,174.89	1,039.51
TOTAL INVESTMENTS REAL ESTATE		43,666,247.95		54,669,748.69	11,003,500.74
TOTAL INVESTMENT		43,666,247.95		54,669,748.69	11,003,500.74



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INVESTMENTS OTHER					
29,805,445.7900	GRESHAM A+ FUND LLC	31,254,632.96	0.8723	26,001,383.00	5,253,249.96-
TOTAL INVESTMENTS OTHER		31,254,632.96		26,001,383.00	5,253,249.96-
TOTAL INVESTMENT		31,254,632.96		26,001,383.00	5,253,249.96-



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<u>SHARES/ PAR VALUE</u>	<u>SECURITY DESCRIPTION</u>	<u>COST</u>	<u>PRICE</u>	<u>MARKET VALUE</u>	<u>UNREALIZED GAIN/LOSS</u>
<u>INVESTMENTS FIXED INCOME SECURITIES</u>					
2,572,859.7980	WTC-CTF JPM PAG EMERGING MARKETS DEBT	25,323,394.79	10.6100	27,298,041.36	1,974,646.57
TOTAL INVESTMENTS FIXED INCOME SECURITIES		25,323,394.79		27,298,041.36	1,974,646.57
TOTAL INVESTMENT		25,323,394.79		27,298,041.36	1,974,646.57



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INVESTMENTS PRIVATE EQUITY					
21,275,923.6600	STEPSTONE XL OPP FUND LP	20,410,140.08	1.2333	26,241,383.83	5,831,243.75
TOTAL INVESTMENTS PRIVATE EQUITY		20,410,140.08		26,241,383.83	5,831,243.75
TOTAL INVESTMENT		20,410,140.08		26,241,383.83	5,831,243.75



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INVESTMENTS OTHER					
15,582,646.6000	GRESHAM COMMODITY FUND CL A	15,582,646.60	1.0224	15,931,954.35	349,307.75
TOTAL INVESTMENTS OTHER		15,582,646.60		15,931,954.35	349,307.75
TOTAL INVESTMENT		15,582,646.60		15,931,954.35	349,307.75



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<u>INVESTMENTS CASH EQUIVALENTS</u>					
2,861,497.8900	FIDELITY INSTL MM PRIME 690	2,861,497.89	100.0000	2,861,497.89	0.00
TOTAL INVESTMENTS CASH EQUIVALENTS		2,861,497.89		2,861,497.89	0.00
<u>INVESTMENTS FIXED INCOME SECURITIES</u>					
205,000.0000	ALASKA ST HSG FIN CORP 5.000% 12/01/2027 DD 05/30/13	221,943.01	114.0400	233,782.00	11,838.99
690,000.0000	ARIZONA BRD OF RGTS UNIV ARIZO 5.000% 08/01/2030 DD 05/30/13	751,383.11	113.0820	780,265.80	28,882.69
675,000.0000	ARIZONA ST LOTTERY REVENUE 5.000% 07/01/2028 DD 06/15/10	718,107.03	109.3330	737,997.75	19,890.72
655,000.0000	ARIZONA ST TRANSPRTN BRD HIGHW 5.000% 07/01/2035 DD 01/29/13	707,783.33	111.9460	733,246.30	25,462.97
100,000.0000	CALIFORNIA ST 5.050% 12/01/2036 DD 04/01/05	100,487.66	100.7640	100,764.00	276.34
390,000.0000	CHICAGO IL TRANSIT AUTH SALES 5.250% 12/01/2029 DD 11/04/11	450,561.27	111.0690	433,169.10	17,392.17-
80,000.0000	DETROIT MI CITY SCH DIST 5.250% 05/01/2032 DD 08/17/05	84,274.31	113.6240	90,899.20	6,624.89
50,000.0000	DETROIT MI CITY SCH DIST 5.636% 05/01/2016 DD 12/30/09	53,208.67	104.5120	52,256.00	952.67-



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70,000.0000	DETROIT MI CITY SCH DIST 6.252% 05/01/2018 DD 12/30/09	77,208.55	106.9640	74,874.80	2,333.75-
1,407,570.9400	FNMA POOL #0AO4103 3.500% 06/01/2042 DD 06/01/12	1,432,175.93	102.2160	1,438,762.71	6,586.78
1,531,438.4000	FNMA POOL #0AO7284 3.500% 07/01/2042 DD 06/01/12	1,558,208.79	102.2270	1,565,543.53	7,334.74
1,095,210.9500	FNMA POOL #0AQ4086 4.000% 06/01/2043 DD 06/01/13	1,151,970.96	105.6120	1,156,674.19	4,703.23
1,082,800.6000	FNMA POOL #0AO9179 3.500% 07/01/2042 DD 06/01/12	1,098,010.61	102.2260	1,106,903.74	8,893.13
1,414,782.5900	FNMA POOL #0AO9180 3.500% 07/01/2042 DD 06/01/12	1,439,513.78	102.2220	1,446,219.06	6,705.28
1,090,743.1100	FNMA POOL #0AR4445 3.000% 03/01/2043 DD 03/01/13	1,057,716.82	98.3450	1,072,691.31	14,974.49
500,000.0000	FLORIDA ST HSG FIN CORP REVENU 4.000% 07/01/2027 DD 12/23/13	500,000.00	105.2950	526,475.00	26,475.00
5,000.0000	GEORGIA-PACIFIC LLC 8.000% 01/15/2024 DD 12/11/03	6,758.31	134.8440	6,742.20	16.11-
157,483.8800	ILLINOIS ST HSG DEV AUTH 3.875% 12/01/2043 DD 10/01/13	157,483.88	104.2110	164,115.53	6,631.65
365,000.0000	LOS ANGELES CNTY CA MET TRANSP 5.000% 07/01/2024 DD 12/18/13	424,735.16	122.1630	445,894.95	21,159.79



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340,000.0000	MAINE ST HSG AUTH MTGE REVENUE 2.700% 11/15/2023 DD 02/21/13	340,000.00	96.5690	328,334.60	11,665.40-
155,000.0000	MAINE ST HSG AUTH MTGE REVENUE 3.450% 11/15/2032 DD 02/21/13	153,701.07	97.7300	151,481.50	2,219.57-
165,000.0000	MAINE ST HSG AUTH MTGE REVENUE 4.000% 11/15/2028 DD 07/17/13	165,000.00	104.2730	172,050.45	7,050.45
410,000.0000	MAINE ST HSG AUTH MTGE REVENUE 4.950% 11/15/2028 DD 09/26/13	410,000.00	107.7420	441,742.20	31,742.20
500,000.0000	MASSACHUSETTS ST HSG FIN AGY 3.750% 12/01/2028 DD 03/21/13	500,000.00	97.8240	489,120.00	10,880.00-
160,000.0000	MET GOVT NASHVILLE & DAVIDSONC 5.000% 05/15/2027 DD 06/27/13	182,832.87	117.7090	188,334.40	5,501.53
120,000.0000	MICHIGAN ST 5.000% 12/01/2028 DD 07/01/14	140,744.40	117.9850	141,582.00	837.60
330,000.0000	MINNESOTA ST 5.000% 08/01/2025 DD 08/15/13	372,154.35	121.0500	399,465.00	27,310.65
800,000.0000	MINNESOTA ST HSG FIN AGY 4.875% 07/01/2037 DD 10/26/06	797,234.39	100.7990	806,392.00	9,157.61
75,000.0000	MINNESOTA ST RETMNT SYS BLDG R 4.000% 06/01/2023 DD 08/09/12	79,762.58	112.0900	84,067.50	4,304.92
306,031.4500	MINNESOTA ST HSG FIN AGY HOME0 2.350% 03/01/2043 DD 02/28/13	306,031.45	94.8560	290,289.19	15,742.26-



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314,317.6500	MINNESOTA ST HSG FIN AGY HOME0 3.000% 09/01/2043 DD 07/25/13	314,317.65	101.1770	318,017.17	3,699.52
1,370,000.0000	MINNESOTA ST HSG FIN AGY HOME0 3.000% 07/01/2044 DD 06/19/14	1,370,000.00	101.0040	1,383,754.80	13,754.80
245,000.0000	MINNESOTA ST HSG FIN AGY 2.750% 01/01/2023 DD 06/20/13	245,000.00	101.9810	249,853.45	4,853.45
105,000.0000	MINNESOTA ST HSG FIN AGY 3.200% 01/01/2025 DD 04/30/14	105,000.00	100.5710	105,599.55	599.55
510,000.0000	MISSOURI ST ENVRNMNTL IMPT & E 5.000% 07/01/2025 DD 11/26/13	588,178.47	121.2110	618,176.10	29,997.63
135,000.0000	MONTANA ST BRD OF HSG 3.350% 12/01/2025 DD 05/30/13	135,000.00	96.6410	130,465.35	4,534.65-
595,000.0000	MONTANA ST BRD OF HSG 3.550% 12/01/2033 DD 05/30/13	595,000.00	100.2150	596,279.25	1,279.25
115,000.0000	MONTANA ST BRD OF HSG 4.650% 12/01/2028 DD 09/26/13	115,000.00	108.2710	124,511.65	9,511.65
650,000.0000	NEBRASKA ST INVESTMENT FIN AUT 3.600% 03/01/2031 DD 05/30/13	650,000.00	98.0280	637,182.00	12,818.00-
105,000.0000	NEBRASKA ST INVESTMENT FIN AUT 3.650% 09/01/2024 DD 11/26/13	105,000.00	104.5190	109,744.95	4,744.95
350,000.0000	NEW JERSEY ST HGR EDU ASSISTAN 3.625% 12/01/2025 DD 06/20/13	328,859.69	97.1950	340,182.50	11,322.81



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490,000.0000	NEW JERSEY ST HGR EDU ASSISTAN 3.750% 12/01/2026 DD 06/20/13	481,394.97	97.6900	478,681.00	2,713.97-
720,000.0000	NEW MEXICO ST EDUCTNL ASSISTAN 3.875% 04/01/2034 DD 05/08/13	688,739.45	96.8370	697,226.40	8,486.95
490,000.0000	NEW YORK CITY NY MUNI WTR FINA 5.000% 06/15/2035 DD 06/27/13	533,299.14	112.0200	548,898.00	15,598.86
230,000.0000	NEW YORK ST ENVRNMNTL FACS COR 5.000% 06/15/2024 DD 05/31/12	262,838.59	119.7070	275,326.10	12,487.51
325,000.0000	NEW YORK ST HSG FIN AGY ST PER 5.000% 03/15/2034 DD 06/19/08	329,595.21	110.3420	358,611.50	29,016.29
280,000.0000	NEW YORK ST MTGE AGY REVENUE 3.150% 10/01/2027 DD 04/25/13	280,000.00	96.8530	271,188.40	8,811.60-
145,000.0000	NEW YORK ST THRUWAY AUTH PERSO 5.000% 03/15/2027 DD 09/06/12	162,331.07	115.7790	167,879.55	5,548.48
310,290.0000	OKLAHOMA ST HSG FIN AGY SF MTG 3.350% 09/01/2035 DD 10/30/13	310,290.00	97.1710	301,511.90	8,778.10-
555,000.0000	OMAHA NE 6.500% 12/01/2030 DD 12/01/00	748,124.74	140.7770	781,312.35	33,187.61
130,000.0000	OREGON ST DEPT OF ADMIN SVCS L 5.000% 04/01/2026 DD 04/16/13	142,350.69	118.8290	154,477.70	12,127.01
625,000.0000	OREGON ST HSG & CMNTY SVCS DEP 3.500% 07/01/2028 DD 06/12/13	625,000.00	100.4020	627,512.50	2,512.50



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165,000.0000	PACIFIC BELL TELEPHONE CO 7.125% 03/15/2026 DD 03/15/93	218,578.94	128.3570	211,789.05	6,789.89-
500,000.0000	PENNSYLVANIA ST HSG FIN AGY SF 3.350% 04/01/2023 DD 05/01/13	500,000.00	100.3580	501,790.00	1,790.00
100,000.0000	PENNSYLVANIA ST HGR EDUCTNL FA 5.000% 05/15/2031 DD 03/24/10	110,513.75	107.4600	107,460.00	3,053.75-
95,000.0000	PORT OF SEATTLE WA 5.750% 12/01/2025 DD 02/23/11	113,750.44	123.7930	117,603.35	3,852.91
435,000.0000	PUERTO RICO PUBLIC FIN CORP 5.500% 08/01/2027 DD 01/16/02	502,850.95	125.4180	545,568.30	42,717.35
520,000.0000	PUERTO RICO PUBLIC FIN CORP 6.000% 08/01/2026 DD 01/16/02	642,991.55	129.9070	675,516.40	32,524.85
480,000.0000	REGL TRANSPRTN DIST CO SALES T 5.000% 11/01/2029 DD 05/16/13	543,467.32	121.9500	585,360.00	41,892.68
250,000.0000	REGL TRANSPRTN AUTH IL 5.750% 06/01/2034 DD 09/15/04	267,546.55	129.0410	322,602.50	55,055.95
1,160,000.0000	SLM STUDENT LOAN TRUST 200 4 B VAR RT 12/15/2023 DD 07/09/02	1,128,572.42	98.3220	1,140,535.20	11,962.78
965,000.0000	SLM STUDENT LOAN TRUST 200 3 B VAR RT 12/15/2024 DD 03/26/03	931,655.11	97.9120	944,850.80	13,195.69
950,000.0000	SLM STUDENT LOAN TRUST 200 4 B VAR RT 01/27/2025 DD 05/05/04	907,748.44	96.8430	920,008.50	12,260.06



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730,000.0000	SOUTH DAKOTA HSG DEV AUTH 3.550% 11/01/2033 DD 05/30/13	730,000.00	99.1120	723,517.60	6,482.40-
300,000.0000	SOUTH DAKOTA HSG DEV AUTH 4.100% 11/01/2028 DD 11/25/13	300,000.00	105.0790	315,237.00	15,237.00
115,000.0000	SOUTH DAKOTA HSG DEV AUTH 3.250% 05/01/2024 DD 04/30/14	115,000.00	102.0210	117,324.15	2,324.15
475,000.0000	TENNESSEE HSG DEV AGY RSDL FIN 3.000% 01/01/2025 DD 05/30/13	475,000.00	98.7560	469,091.00	5,909.00-
470,000.0000	TENNESSEE HSG DEV AGY RSDL FIN 4.000% 07/01/2043 DD 05/30/13	474,100.46	100.5020	472,359.40	1,741.06-
3,224,664.0000	US TREAS-CPI INFLAT 2.000%001/15/2026 DD 01/15/06	4,160,853.20	117.8200	3,799,299.12	361,554.08-
2,760,200.0000	US TREAS-CPI INFLAT 2.500% 01/15/2029 DD 01/15/09	3,875,632.77	126.1720	3,482,599.54	393,033.23-
1,096,730.0000	US TREAS-CPI INFLAT 2.125% 02/15/2040 DD 02/15/10	1,625,245.76	127.2270	1,395,336.68	229,909.08-
1,363,778.0000	US TREAS-CPI INFLAT 0.750% 02/15/2042 DD 02/15/12	1,552,366.06	94.1330	1,283,765.14	268,600.92-
200,000.0000	UNIV OF WASHINGTON WA UNIV REV 5.000% 07/01/2030 DD 09/05/13	210,259.31	116.1910	232,382.00	22,122.69
350,000.0000	VERMONT ST STUDENT ASSISTANCEC 3.900% 06/15/2022 DD 07/02/13	350,000.00	100.6060	352,121.00	2,121.00



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735,000.0000	VIRGINIA ST HSG DEV AUTH CMWLT 3.875% 01/01/2038 DD 04/11/13	735,254.61	99.6170	732,184.95	3,069.66-
500,000.0000	WASHINGTON ST HSG FIN COMMISSI 3.150% 06/01/2023 DD 03/27/13	500,000.00	100.2210	501,105.00	1,105.00
240,000.0000	WASHINGTON ST HSG FIN COMMISSI 4.500% 06/01/2028 DD 01/28/14	240,000.00	105.2960	252,710.40	12,710.40
85,000.0000	WHITE SETTLEMENT TX INDEP SCHD 0.000% 08/15/2036 DD 05/16/13	34,285.50	39.7460	33,784.10	501.40-
250,000.0000	WYOMING ST CMNTY DEV AUTH HSGR 3.400% 06/01/2023 DD 04/11/13	250,000.00	99.6950	249,237.50	762.50-
1,635,000.0000	IFL L UL CPURNSA P 2.865% 2033 MAY 02	0.00	0.0000	0.00	0.00
3,200,000.0000	3ML CAP Q/Q 3.50% CALL JAN 26 000.035 ED 010126	0.00	6.9846	223,509.00	223,509.00
4,950,000.0000	3ML CAP Q/Q 3.75% CALL JUL 29 000.0375 ED 070129	0.00	9.0462	447,791.00	447,791.00
1,635,000.0000	IFL L UL CPURNSA INDEX P 2.775% 2033 JUN 07	0.00	0.0000	0.00	0.00
1,635,000.0000	IFL L UL CPURNSA INDEX P 2.7125% 2033 JUN 10	0.00	0.0000	0.00	0.00
1,635,000.0000	IFL L UL CPURNSA P 2.63% 2028 JUN 14	0.00	0.0000	0.00	0.00



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1,635,000.0000	IRS_R US0003M P 6.75% 2038 JUN 19	52,810.50	27.4493	448,797.00	395,986.50
3,250,000.0000	IRS-R US0003M P 6.75% 2034 JAN 29	86,125.00	19.5206	634,420.00	548,295.00
TOTAL INVESTMENTS FIXED INCOME SECURITIES		46,188,920.60		47,176,183.86	987,263.26
TOTAL INVESTMENT		49,050,418.49		50,037,681.75	987,263.26
<u>SHORT FIXED INCOME SECURITIES</u>					
1,635,000.0000-	IFL S UL CPURNSA P 2.865% 2033 MAY 02	0.00	3.8570	63,063.00-	63,063.00-
1,635,000.0000-	IFL S UL CPURNSA INDEX P 2.775% 2033 JUN 07	0.00	1.7225	28,164.00-	28,164.00-
1,635,000.0000-	IFL S UL CPURNSA INDEX P 2.7125% 2033 JUN 10	0.00	0.5007	8,188.00-	8,188.00-
1,635,000.0000-	IFL S UL CPURNSA P 2.63% 2028 JUN 14	0.00	0.1573	2,573.00-	2,573.00-
1,635,000.0000-	IRS R US0003M P 6.75% 2038 JUN 19	0.00	25.5797	418,229.00-	418,229.00-
3,250,000.0000-	IRS R US0003M P 6.75% 2034 JAN 27	0.00	17.7924	578,253.00-	578,253.00-
TOTAL SHORT FIXED INCOME SECURITIES		0.00		1,098,470.00-	1,098,470.00-



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<u>SHARES/ PAR VALUE</u>	<u>SECURITY DESCRIPTION</u>	<u>COST</u>	<u>PRICE</u>	<u>MARKET VALUE</u>	<u>UNREALIZED GAIN/LOSS</u>
<u>WRITTEN OPTIONS FIXED INCOME SECURITIES</u>					
3,200,000.0000-	CPI CAP YOY 3.255% PUT JAN 26 000.03255 ED 010126	0.00	4.4726	143,126.00-	143,126.00-
4,950,000.0000-	CPI CAP YOY 3.41% PUT JUL 29 000.0341 ED 070129	0.00	5.9994	296,975.00-	296,975.00-
1,635,000.0000-	INF CAP UL CPI 3.75% 12/01/26 PUT DEC 26 003.750 ED 12/01/26	90,415.50-	3.9467	64,530.00-	25,885.50
TOTAL WRITTEN OPTIONS FIXED INCOME SECURITIES		90,415.50-		504,631.00-	414,215.50-
TOTAL SHORT INVESTMENT		90,415.50-		1,603,101.00-	1,512,685.50-
TOTAL NET INVESTMENT		48,960,002.99		48,434,580.75	525,422.24-



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TRDNSN NSNF09231002 MONTHLY FINAL 094253
INVESTMENT DETAIL
NSN F092310
TITAN MASTERS LP-PI 2
XCEL ENERGY NDT

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<u>SHARES/ PAR VALUE</u>	<u>SECURITY DESCRIPTION</u>	<u>COST</u>	<u>PRICE</u>	<u>MARKET VALUE</u>	<u>UNREALIZED GAIN/LOSS</u>
INVESTMENTS ALTERNATIVE INVESTMENTS					
25,729,867.0000	TITAN FUND LP	25,729,867.00	1.0231	26,324,325.00	594,458.00
TOTAL INVESTMENTS ALTERNATIVE INVESTMENTS		25,729,867.00		26,324,325.00	594,458.00
TOTAL INVESTMENT		25,729,867.00		26,324,325.00	594,458.00



BNY MELLON

TRDNSN NSNF09231302 MONTHLY FINAL 094253
INVESTMENT DETAIL
NSN F092313
MAGNITUDE-PI 2
XCEL ENERGY NDT

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<u>SHARES/ PAR VALUE</u>	<u>SECURITY DESCRIPTION</u>	<u>COST</u>	<u>PRICE</u>	<u>MARKET VALUE</u>	<u>UNREALIZED GAIN/LOSS</u>
INVESTMENTS ALTERNATIVE INVESTMENTS					
9,422.3900	MAGNITUDE US PARTNERS	9,422,392.78	1,052.5743	9,917,766.00	495,373.22
7,976.8900	MAGNITUDE US PARTNERS (SERIES Y)	8,249,043.03	1,052.9498	8,399,265.00	150,221.97
8,050.2800	MAGNITUDE US PARTNERS (SERIES X)	8,275,274.11	1,056.0556	8,501,544.00	226,269.89
97.5400	MAGNITUDE US PARTNERS 041414 SERIES Y	97,539.38	1,009.8728	98,503.00	963.62
TOTAL INVESTMENTS ALTERNATIVE INVESTMENTS		26,044,249.30		26,917,078.00	872,828.70
TOTAL INVESTMENT		26,044,249.30		26,917,078.00	872,828.70

Schedule F contains the documents required by the Commission to be filed with every submittal, the activity for the escrow fund since the last filing. This activity documents the roll forwards for the Escrow Fund balances. Annually the Company supplies the Escrow Fund statements to the Commission. These statements are included in this section. Below is a list of the schedules included.

Escrow Analysis, Statements and Balances Supporting Schedules

- F.1 Analysis of Escrow Fund Balances 2011 - 2014
- F.2 Trustee Statements – Escrow Fund, Monticello (MN Jurisdiction)
- F.3 Trustee Statements – Escrow Fund, Prairie Island Unit 1 (MN Jurisdiction)
- F.4 Trustee Statements – Escrow Fund, Prairie Island Unit 2 (MN Jurisdiction)
- F.5 Trustee Statements – Escrow Fund, All Units (Total Company)

Xcel Energy
Escrow Fund Analysis, Statements and Balances
2011 Minnesota Jurisdiction Balances

Docket No. E002/M-14-761
Schedule F.1
Page 1 of 4

	Beginning Balance	Accruals	Gains & Losses	Dividends & Interest	Commissions, Taxes & Fees	Transfers & Adjustments	Ending Balance
Escrow Fund							
Prairie Island Unit 1	37,526,887	-	213,144	228,657	(84,152)	-	37,884,536
Prairie Island Unit 2	47,933,453	-	272,251	292,066	(107,488)	-	48,390,282
Monticello	-	-	-	-	-	-	-
Total	85,460,339	-	485,394	520,724	(191,639)	-	86,274,818

Xcel Energy
Escrow Fund Analysis, Statements and Balances
2012 Minnesota Jurisdiction Balances

Docket No. E002/M-14-761
Schedule F.1
Page 2 of 4

	Beginning Balance	Accruals	Gains & Losses	Dividends & Interest	Commissions, Taxes & Fees	Transfers & Adjustments	Ending Balance
Escrow Fund							
Prairie Island Unit 1	37,884,536	377,148	-	194,941	(96,181)	(12,250,343)	26,110,102
Prairie Island Unit 2	48,390,282	1,329,518	-	255,439	(131,227)	893,775	50,737,787
Monticello	-	13,613,913	-	9,247	(12,025)	11,356,568	24,967,703
Total	86,274,818	15,320,579	-	459,627	(239,432)	-	101,815,592

Xcel Energy
Escrow Fund Analysis, Statements and Balances
2013 Minnesota Jurisdiction Balances

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Schedule F.1
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	Beginning Balance	Accruals	Gains & Losses	Dividends & Interest	Commissions, Taxes & Fees	Transfers & Adjustments	Ending Balance
Escrow Fund							
Prairie Island Unit 1	26,110,102	-	(443,727)	569,260	(97,842)	-	26,137,794
Prairie Island Unit 2	50,737,787	952,368	(862,129)	1,108,019	(191,040)	-	51,745,005
Monticello	24,967,703	13,236,764	(424,124)	571,725	(106,590)	-	38,245,477
Total	101,815,592	14,189,132	(1,729,980)	2,249,005	(395,472)	-	116,128,276

Xcel Energy
Escrow Fund Analysis, Statements and Balances
2014 Minnesota Jurisdiction Balances

Docket No. E002/M-14-761
Schedule F.1
Page 4 of 4

	Beginning Balance	Accruals	Gains & Losses	Dividends & Interest	Commissions, Taxes & Fees	Transfers & Adjustments	Ending Balance Jun. 30, 2014
Escrow Fund							
Prairie Island Unit 1	26,137,794	-	(6,276)	368,872	(58,913)	-	26,441,477
Prairie Island Unit 2	51,745,005	-	(12,430)	730,597	(116,684)	-	52,346,488
Monticello	38,245,477	-	(9,287)	545,842	(87,177)	-	38,694,856
Total	116,128,276	-	(27,992)	1,645,311	(262,773)	-	117,482,821



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INVESTMENT DETAIL
XES F092319
XCEL ENERGY ESCROW
MONTICELLO MINNESOTA RETAIL

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<u>SHARES/ PAR VALUE</u>	<u>SECURITY DESCRIPTION</u>	<u>COST</u>	<u>PRICE</u>	<u>MARKET VALUE</u>	<u>UNREALIZED GAIN/LOSS</u>
INVESTMENTS UNIT OF PARTICIPATION					
32,656,829.1820	XCEL ENERGY ESCROW MASTER TRUST UNIT	38,694,855.70	1.2033	39,296,550.38	601,694.68
TOTAL INVESTMENTS UNIT OF PARTICIPATION		38,694,855.70		39,296,550.38	601,694.68
TOTAL INVESTMENT		38,694,855.70		39,296,550.38	601,694.68



TRDXES XESF09230202 MONTHLY FINAL 234834

INVESTMENT DETAIL

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PRAIRIE ISLAND 1 MINNESOTA RET

<u>SHARES/ PAR VALUE</u>	<u>SECURITY DESCRIPTION</u>	<u>COST</u>	<u>PRICE</u>	<u>MARKET VALUE</u>	<u>UNREALIZED GAIN/LOSS</u>
<u>INVESTMENTS UNIT OF PARTICIPATION</u>					
22,069,023.3570	XCEL ENERGY ESCROW MASTER TRUST UNIT	26,441,477.49	1.2033	26,556,053.05	114,575.56
TOTAL INVESTMENTS UNIT OF PARTICIPATION		26,441,477.49		26,556,053.05	114,575.56
TOTAL INVESTMENT		26,441,477.49		26,556,053.05	114,575.56



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INVESTMENT DETAIL

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PRAIRIE ISLAND 2 MINNESOTA RET

<u>SHARES/ PAR VALUE</u>	<u>SECURITY DESCRIPTION</u>	<u>COST</u>	<u>PRICE</u>	<u>MARKET VALUE</u>	<u>UNREALIZED GAIN/LOSS</u>
<u>INVESTMENTS UNIT OF PARTICIPATION</u>					
43,710,472.7320	XCEL ENERGY ESCROW MASTER TRUST UNIT	52,346,488.23	1.2033	52,597,598.63	251,110.40
TOTAL INVESTMENTS UNIT OF PARTICIPATION		52,346,488.23		52,597,598.63	251,110.40
TOTAL INVESTMENT		52,346,488.23		52,597,598.63	251,110.40



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INVESTMENT DETAIL
XES F092404
XCEL ENERGY ESCROW
DELAWARE

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<u>SHARES/ PAR VALUE</u>	<u>SECURITY DESCRIPTION</u>	<u>COST</u>	<u>PRICE</u>	<u>MARKET VALUE</u>	<u>UNREALIZED GAIN/LOSS</u>
<u>INVESTMENTS CASH EQUIVALENTS</u>					
1,044,830.9300	DREYFUS CASH MGMT INSTL FD 288	1,044,830.93	100.0000	1,044,830.93	0.00
TOTAL INVESTMENTS CASH EQUIVALENTS		1,044,830.93		1,044,830.93	0.00
<u>INVESTMENTS FIXED INCOME SECURITIES</u>					
1,250,000.0000	ALLEGHENY CNTY PA HOSP DEV AUT 5.000% 05/15/2017 DD 03/24/10	1,387,717.96	111.5970	1,394,962.50	7,244.54
600,000.0000	ALLEGHENY CNTY PA HGR EDU BLDG 5.000% 03/01/2024 DD 03/19/13	710,008.98	116.1880	697,128.00	12,880.98-
425,000.0000	ALLEGHENY CNTY PA HGR EDU BLDG 5.000% 03/01/2025 DD 03/19/13	500,891.28	115.0700	489,047.50	11,843.78-
1,250,000.0000	ALLEGHENY CNTY PA PORT AUTH 5.750% 03/01/2029 DD 03/01/11	1,371,043.88	114.2330	1,427,912.50	56,868.62
1,000,000.0000	ARIZONA BRD OF RGTS ST UNIV SY 5.000% 07/01/2037 DD 01/22/13	1,151,428.72	110.3170	1,103,170.00	48,258.72-
1,250,000.0000	ARIZONA ST HLTH FACS AUTH HOSP 5.000% 02/01/2033 DD 02/26/13	1,371,721.99	107.1280	1,339,100.00	32,621.99-
250,000.0000	ARIZONA ST COPS 4.000% 10/01/2015 DD 02/13/13	259,565.39	104.4610	261,152.50	1,587.11
700,000.0000	ARIZONA ST COPS 5.000% 10/01/2024 DD 02/13/13	816,117.58	114.4810	801,367.00	14,750.58-



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INVESTMENT DETAIL

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XCEL ENERGY ESCROW
DELAWARE

<u>SHARES/ PAR VALUE</u>	<u>SECURITY DESCRIPTION</u>	<u>COST</u>	<u>PRICE</u>	<u>MARKET VALUE</u>	<u>UNREALIZED GAIN/LOSS</u>
1,210,000.0000	ARIZONA ST TRANSPRTN BRD HIGHW 5.000% 07/01/2032 DD 09/25/08	1,285,207.70	111.1610	1,345,048.10	59,840.40
1,250,000.0000	ARIZONA ST TRANSPRTN BRD HIGHW 5.000% 07/01/2038 DD 01/29/13	1,451,260.42	111.1280	1,389,100.00	62,160.42-
340,000.0000	ARLINGTON CNTY VA 4.000% 08/01/2014 DD 12/22/09	341,070.24	100.3370	341,145.80	75.56
350,000.0000	ATLANTA GA ARPT REVENUE 5.000% 01/01/2033 DD 04/10/14	380,350.04	112.3810	393,333.50	12,983.46
1,500,000.0000	BAY AREA CA TOLL AUTH TOLL BRI 5.000% 04/01/2034 DD 08/28/08	1,567,264.12	110.9270	1,663,905.00	96,640.88
1,000,000.0000	BAY AREA CA WTR SPLY & CONSV A 5.000% 10/01/2034 DD 02/27/13	1,174,970.53	113.0710	1,130,710.00	44,260.53-
600,000.0000	BOWIE CNTY TX INDL DEV CORP VAR RT 11/01/2025 DD 11/08/85	600,000.00	100.0000	600,000.00	0.00
1,250,000.0000	BREVARD CNTY FL HLTH FACS AUTH 7.000% 04/01/2039 DD 07/01/09	1,353,847.82	115.5270	1,444,087.50	90,239.68
1,250,000.0000	BROWARD CNTY FL ARPT SYS REVEN 5.250% 10/01/2029 DD 10/23/13	1,296,598.07	111.3820	1,392,275.00	95,676.93
1,250,000.0000	CALIFORNIA ST HLTH FACS FING A 5.000% 03/01/2026 DD 02/14/13	1,454,283.64	113.0460	1,413,075.00	41,208.64-
1,250,000.0000	CALIFORNIA ST HLTH FACS FING A VAR RT 07/01/2043 DD 07/24/13	1,399,764.34	113.6510	1,420,637.50	20,873.16



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XCEL ENERGY ESCROW
DELAWARE

<u>SHARES/ PAR VALUE</u>	<u>SECURITY DESCRIPTION</u>	<u>COST</u>	<u>PRICE</u>	<u>MARKET VALUE</u>	<u>UNREALIZED GAIN/LOSS</u>
1,120,000.0000	CALIFORNIA ST MUNI FIN AUTH MO 5.250% 08/15/2049 DD 06/05/14	1,164,720.86	105.9530	1,186,673.60	21,952.74
2,500,000.0000	CALIFORNIA ST VAR RT 05/01/2040 DD 11/12/10	2,500,000.00	100.0000	2,500,000.00	0.00
750,000.0000	CALIFORNIA ST 5.250% 09/01/2027 DD 09/28/11	883,943.05	117.8010	883,507.50	435.55-
1,095,000.0000	CALIFORNIA ST 5.000% 10/01/2019 DD 04/23/13	1,275,768.60	118.4730	1,297,279.35	21,510.75
2,250,000.0000	CALIFORNIA ST 5.000% 10/01/2029 DD 04/23/13	2,492,192.13	111.9460	2,518,785.00	26,592.87
1,250,000.0000	CALIFORNIA ST ECON RECOVERY 5.000% 07/01/2019 DD 11/05/09	1,471,193.07	118.7720	1,484,650.00	13,456.93
1,000,000.0000	CALIFORNIA ST PUBLIC WKS BRD L 5.000% 03/01/2038 DD 03/28/13	1,078,875.34	109.4060	1,094,060.00	15,184.66
1,250,000.0000	CALIFORNIA ST STWD CMNTYS DEV 5.250% 12/01/2027 DD 12/13/07	1,287,741.19	105.0800	1,313,500.00	25,758.81
2,000,000.0000	CALIFORNIA ST STWD CMNTYS DEV VAR RT 08/15/2027 DD 05/13/08	2,000,000.00	100.0000	2,000,000.00	0.00
1,250,000.0000	CALIFORNIA ST STWD CMNTYS DEVA 5.000% 04/01/2042 DD 04/18/12	1,260,979.89	108.0570	1,350,712.50	89,732.61
365,000.0000	CHARLESTON SC WTRWKS & SWR REV 5.125% 01/01/2016 DD 10/15/98	389,652.74	107.2450	391,444.25	1,791.51



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XCEL ENERGY ESCROW
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<u>SHARES/ PAR VALUE</u>	<u>SECURITY DESCRIPTION</u>	<u>COST</u>	<u>PRICE</u>	<u>MARKET VALUE</u>	<u>UNREALIZED GAIN/LOSS</u>
1,320,000.0000	CHICAGO IL O'HARE INTERNATIONAL 5.000% 01/01/2026 DD 10/17/13	1,367,010.78	110.7940	1,462,480.80	95,470.02
225,000.0000	COLORADO ST EDUCTNL & CULTURAL 4.000% 03/01/2019 DD 03/12/13	249,158.85	110.2060	247,963.50	1,195.35-
325,000.0000	COLORADO ST HLTH FACS AUTH REV 5.625% 06/01/2043 DD 10/02/13	317,040.75	109.8040	356,863.00	39,822.25
1,250,000.0000	CONNECTICUT ST HLTH & EDUCTNLF VAR RT 07/01/2049 DD 02/07/13	1,250,000.00	99.7470	1,246,837.50	3,162.50-
1,250,000.0000	DALLAS-FORT WORTH TX INTERNATI 5.000% 11/01/2033 DD 10/31/12	1,393,676.49	107.8050	1,347,562.50	46,113.99-
5,000.0000	DALLAS TX 5.000% 02/15/2020 DD 03/30/10	6,002.41	118.7760	5,938.80	63.61-
1,245,000.0000	DALLAS TX 5.000% 02/15/2020 DD 03/30/10	1,493,915.17	118.8870	1,480,143.15	13,772.02-
1,150,000.0000	DALLAS TX AREA RAPID TRANSIT S 5.250% 12/01/2038 DD 06/23/08	1,220,273.46	112.4690	1,293,393.50	73,120.04
1,000,000.0000	DEER PARK TX INDEP SCH DIST 4.000% 02/15/2018 DD 02/01/13	1,112,967.69	111.1920	1,111,920.00	1,047.69-
350,000.0000	DELAWARE ST 5.000% 01/01/2015 DD 01/28/09	358,086.26	102.4520	358,582.00	495.74
1,000,000.0000	ERNEST N MORIAL-NEW ORLEANS LA 5.000% 07/15/2027 DD 11/14/12	1,137,739.91	109.8290	1,098,290.00	39,449.91-



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<u>SHARES/ PAR VALUE</u>	<u>SECURITY DESCRIPTION</u>	<u>COST</u>	<u>PRICE</u>	<u>MARKET VALUE</u>	<u>UNREALIZED GAIN/LOSS</u>
1,250,000.0000	FAIRFAX CNTY VA 4.000% 10/01/2015 DD 01/24/13	1,305,970.95	104.7970	1,309,962.50	3,991.55
1,250,000.0000	FLORIDA ST BRD OF EDU PUBLIC E 5.000% 06/01/2018 DD 04/21/11	1,437,957.10	115.7120	1,446,400.00	8,442.90
500,000.0000	FOX CHAPEL PA AREA SCH DIST 3.000% 08/01/2016 DD 03/07/13	523,597.29	105.4310	527,155.00	3,557.71
1,250,000.0000	GLENDALE AZ MUNI PROPERTY CORP 5.000% 07/01/2033 DD 12/27/12	1,388,659.59	108.5740	1,357,175.00	31,484.59-
1,000,000.0000	GOLDEN ST TOBACCO SECURITIZATI 5.000% 06/01/2017 DD 04/09/13	1,111,837.57	112.7350	1,127,350.00	15,512.43
500,000.0000	HARRIS CNTY TX CULTURAL EDU FA 4.000% 12/01/2016 DD 03/28/13	537,901.18	108.0950	540,475.00	2,573.82
1,250,000.0000	HARRIS CNTY TX MET TRANSIT AUT 5.000% 11/01/2036 DD 09/28/11	1,458,506.39	110.3750	1,379,687.50	78,818.89-
1,060,000.0000	HAWAII CNTY HI 5.000% 09/01/2016 DD 02/12/13	1,157,499.51	109.9320	1,165,279.20	7,779.69
1,250,000.0000	HAWAII ST 5.000% 11/01/2020 DD 12/04/12	1,505,774.75	119.5830	1,494,787.50	10,987.25-
1,145,000.0000	HAWAII ST 5.000% 08/01/2023 DD 11/21/13	1,349,758.40	121.8410	1,395,079.45	45,321.05
1,250,000.0000	HONOLULU CITY & CNTY HI 5.000% 11/01/2016 DD 11/20/12	1,375,456.87	110.7750	1,384,687.50	9,230.63



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<u>SHARES/ PAR VALUE</u>	<u>SECURITY DESCRIPTION</u>	<u>COST</u>	<u>PRICE</u>	<u>MARKET VALUE</u>	<u>UNREALIZED GAIN/LOSS</u>
1,200,000.0000	HOUSTON TX INDEP SCH DIST 4.000% 02/15/2016 DD 02/14/13	1,267,928.62	106.0360	1,272,432.00	4,503.38
590,000.0000	ILLINOIS ST FIN AUTH REVENUE 5.500% 07/01/2037 DD 01/07/09	635,091.79	112.3740	663,006.60	27,914.81
585,000.0000	ILLINOIS ST FIN AUTH REVENUE 7.000% 08/15/2044 DD 06/11/09	635,228.68	112.1480	656,065.80	20,837.12
1,250,000.0000	ILLINOIS ST EDUCTNL FACS AUTH VAR RT 07/01/2036 DD 02/14/13	1,250,000.00	99.8320	1,247,900.00	2,100.00-
1,000,000.0000	ILLINOIS ST TOLL HIGHWAY AUTH 5.000% 01/01/2038 DD 05/16/13	1,115,806.65	109.1810	1,091,810.00	23,996.65-
620,000.0000	ILLINOIS ST TOLL HIGHWAY AUTH 5.000% 01/01/2039 DD 06/04/14	674,461.06	109.7480	680,437.60	5,976.54
1,000,000.0000	INTERMOUNTAIN PWR AGY UT PWR S 5.000% 07/01/2022 DD 04/02/13	1,151,315.21	113.5460	1,135,460.00	15,855.21-
1,035,000.0000	KANSAS ST DEPT OF TRANSPRTN HI 5.000% 09/01/2022 DD 09/04/08	1,198,003.12	115.8730	1,199,285.55	1,282.43
1,400,000.0000	KENTUCKY ST ECON DEV FIN AUTH 6.375% 06/01/2040 DD 03/03/10	1,493,649.31	112.4040	1,573,656.00	80,006.69
1,150,000.0000	KENTUCKY ST TURNPIKE AUTH ECON 4.000% 07/01/2014 DD 06/25/10	1,150,000.00	100.0110	1,150,126.50	126.50
1,000,000.0000	KING CNTY WA SWR REVENUE 4.000% 01/01/2017 DD 04/09/13	1,081,064.32	108.6680	1,086,680.00	5,615.68



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115,000.0000	LANCASTER CNTY NE HOSP AUTH #1 VAR RT 06/01/2031 DD 05/27/08	115,000.00	100.0000	115,000.00	0.00
650,000.0000	LARAMIE CNTY WY HOSP REVENUE 5.000% 05/01/2025 DD 02/21/12	721,920.68	111.2510	723,131.50	1,210.82
1,320,000.0000	LOS ANGELES CA WSTWTR SYS REVE 5.000% 06/01/2032 DD 10/21/10	1,410,480.61	112.8390	1,489,474.80	78,994.19
860,000.0000	LOUISIANA ST PUBLIC FACS AUTH 6.250% 05/15/2031 DD 05/11/11	1,000,281.93	116.3380	1,000,506.80	224.87
1,250,000.0000	LOUISIANA ST CITIZENS PROPERTY 5.000% 06/01/2020 DD 04/11/06	1,360,661.44	107.4700	1,343,375.00	17,286.44-
300,000.0000	LOUISIANA ST HIGHWAY IMPT REVE 4.000% 06/15/2018 DD 03/28/13	333,294.18	111.8650	335,595.00	2,300.82
865,000.0000	LOUISIANA ST HIGHWAY IMPT REVE 5.000% 06/15/2034 DD 02/27/14	940,384.27	113.6000	982,640.00	42,255.73
1,700,000.0000	LOUISVILLE & JEFFERSON CNTY KY VAR RT 10/01/2039 DD 08/10/11	1,700,000.00	100.0000	1,700,000.00	0.00
500,000.0000	MADISON CNTY NY CAPITAL RESOUR 5.000% 07/01/2025 DD 02/14/13	609,276.84	118.3630	591,815.00	17,461.84-
1,000,000.0000	MAINE ST HLTH & HGR EDUCTNL FA 5.000% 07/01/2033 DD 02/13/13	1,095,009.31	106.1770	1,061,770.00	33,239.31-
1,250,000.0000	MARYLAND ST 5.000% 11/01/2019 DD 12/18/09	1,501,128.97	119.0080	1,487,600.00	13,528.97-



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<u>SHARES/ PAR VALUE</u>	<u>SECURITY DESCRIPTION</u>	<u>COST</u>	<u>PRICE</u>	<u>MARKET VALUE</u>	<u>UNREALIZED GAIN/LOSS</u>
450,000.0000	MASSACHUSETTS ST HLTH & EDUCTN 5.000% 11/15/2014 DD 01/07/09	457,796.29	101.8480	458,316.00	519.71
1,785,000.0000	MECKLENBURG CNTY NC 4.000% 12/01/2016 DD 01/29/13	1,931,805.58	108.7010	1,940,312.85	8,507.27
2,000,000.0000	MET TRANSPRTN AUTH NY REVENUE 5.000% 11/15/2029 DD 06/11/13	2,182,663.43	110.9100	2,218,200.00	35,536.57
500,000.0000	MET TRANSPRTN AUTH NY REVENUE 5.000% 11/15/2022 DD 04/02/13	596,322.95	119.1070	595,535.00	787.95-
1,305,000.0000	MET WASHINGTON DC ARPTS AUTH D 5.000% 10/01/2053 DD 05/22/14	1,356,418.86	103.6950	1,353,219.75	3,199.11-
1,000,000.0000	MICHIGAN ST FIN AUTH REVENUE 5.000% 10/01/2018 DD 02/20/13	1,166,096.78	116.4970	1,164,970.00	1,126.78-
1,500,000.0000	MINNESOTA ST 5.000% 10/01/2020 DD 11/06/13	1,777,670.66	120.1840	1,802,760.00	25,089.34
1,500,000.0000	MINNESOTA ST 5.000% 10/01/2022 DD 11/06/13	1,769,388.69	121.9930	1,829,895.00	60,506.31
1,250,000.0000	MINNESOTA ST 5.000% 08/01/2016 DD 09/29/10	1,362,984.00	109.7290	1,371,612.50	8,628.50
1,000,000.0000	MONROE CNTY NY INDL DEV CORP R 5.000% 12/01/2037 DD 02/27/13	1,108,976.77	106.7170	1,067,170.00	41,806.77-
1,250,000.0000	MONTGOMERY CNTY MD 5.000% 07/01/2023 DD 08/11/11	1,438,285.29	117.0030	1,462,537.50	24,252.21



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<u>SHARES/ PAR VALUE</u>	<u>SECURITY DESCRIPTION</u>	<u>COST</u>	<u>PRICE</u>	<u>MARKET VALUE</u>	<u>UNREALIZED GAIN/LOSS</u>
1,250,000.0000	NEW JERSEY ST ECON DEV AUTH RE 5.000% 06/15/2025 DD 04/18/12	1,416,101.67	109.7110	1,371,387.50	44,714.17-
300,000.0000	NEW JERSEY ST 5.250% 07/01/2014 DD 10/01/01	300,000.00	100.0140	300,042.00	42.00
625,000.0000	NEW JERSEY ST TRANSPRTN TRUSTF 5.000% 06/15/2042 DD 12/11/12	694,176.72	105.4320	658,950.00	35,226.72-
1,045,000.0000	NEW JERSEY ST TRANSPRTN TRUST 5.000% 12/15/2023 DD 10/21/10	1,249,110.94	116.0520	1,212,743.40	36,367.54-
1,000,000.0000	NEW JERSEY ST TURNPIKE AUTH 5.000% 01/01/2043 DD 04/04/13	1,085,204.94	107.9990	1,079,990.00	5,214.94-
1,000,000.0000	NEW YORK ST LIBERTY DEV CORP L 5.625% 07/15/2047 DD 07/08/10	1,127,099.81	110.0370	1,100,370.00	26,729.81-
430,000.0000	NEW YORK NY 5.000% 08/01/2027 DD 08/09/11	498,223.46	115.2070	495,390.10	2,833.36-
590,000.0000	NEW YORK CITY NY TRANSITIONAL 5.000% 11/01/2036 DD 02/04/14	632,537.28	112.1220	661,519.80	28,982.52
1,000,000.0000	NEW YORK CITY NY TRUST FOR CUL 5.000% 08/01/2033 DD 03/12/13	1,178,804.28	112.2480	1,122,480.00	56,324.28-
1,165,000.0000	NEW YORK CITY NY INDL DEV AGY 5.000% 07/01/2022 DD 09/13/12	1,222,066.84	110.1340	1,283,061.10	60,994.26
1,350,000.0000	NEW YORK ST THRUWAY AUTH GEN R 5.000% 05/01/2019 DD 12/18/13	1,527,189.56	116.1160	1,567,566.00	40,376.44



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<u>SHARES/ PAR VALUE</u>	<u>SECURITY DESCRIPTION</u>	<u>COST</u>	<u>PRICE</u>	<u>MARKET VALUE</u>	<u>UNREALIZED GAIN/LOSS</u>
1,250,000.0000	NEW YORK ST THRUWAY AUTH PERSO 5.000% 03/15/2027 DD 09/24/10	1,425,341.54	117.1370	1,464,212.50	38,870.96
1,500,000.0000	NEW YORK ST THRUWAY AUTH PERSO 5.000% 03/15/2025 DD 09/14/11	1,655,279.25	116.3680	1,745,520.00	90,240.75
1,250,000.0000	NORTH CAROLINA ST 5.000% 05/01/2022 DD 04/14/10	1,507,706.31	120.5430	1,506,787.50	918.81-
1,250,000.0000	N TX TOLLWAY AUTH REVENUE 6.100% 01/01/2028 DD 08/12/09	1,378,528.84	116.7260	1,459,075.00	80,546.16
915,000.0000	NTHRN AZ UNIV COPS 5.000% 09/01/2024 DD 02/20/13	1,060,981.58	113.2800	1,036,512.00	24,469.58-
1,250,000.0000	PENNSYLVANIA ST 5.000% 07/01/2020 DD 08/09/12	1,470,168.95	118.6950	1,483,687.50	13,518.55
810,000.0000	PENNSYLVANIA ST TURNPIKE COMMI 5.000% 12/01/2043 DD 04/29/14	850,638.23	107.5660	871,284.60	20,646.37
1,250,000.0000	PHOENIX AZ CIVIC IMPT CORP ARP 5.000% 07/01/2030 DD 03/05/13	1,434,241.00	111.3350	1,391,687.50	42,553.50-
1,950,000.0000	PRIV CLGS & UNIVS AUTH GA 5.000% 09/01/2027 DD 05/13/09	2,219,026.00	115.5850	2,253,907.50	34,881.50
1,250,000.0000	RAILSPLITTER IL TOBACCO SETTLE 5.500% 06/01/2023 DD 12/08/10	1,461,095.97	118.5870	1,482,337.50	21,241.53
435,000.0000	RALEIGH DURHAM NC ARPT AUTH AR 5.000% 05/01/2018 DD 05/31/07	476,131.14	110.2790	479,713.65	3,582.51



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<u>SHARES/ PAR VALUE</u>	<u>SECURITY DESCRIPTION</u>	<u>COST</u>	<u>PRICE</u>	<u>MARKET VALUE</u>	<u>UNREALIZED GAIN/LOSS</u>
1,000,000.0000	REGL TRANSPRTN DIST CO COPS 5.000% 06/01/2022 DD 05/09/13	1,188,663.02	116.9080	1,169,080.00	19,583.02-
700,000.0000	SAINT CLOUD MN HLTH CARE REVEN 5.125% 05/01/2030 DD 02/03/10	790,609.56	111.4650	780,255.00	10,354.56-
1,500,000.0000	SAINT JOHN THE BAPTIST PARISH 5.125% 06/01/2037 DD 06/26/07	1,568,503.29	104.7530	1,571,295.00	2,791.71
1,000,000.0000	SAINT LOUIS MO ARPT REVENUE 5.000% 07/01/2024 DD 04/03/07	1,070,062.77	108.3080	1,083,080.00	13,017.23
300,000.0000	SAINT PAUL MN HSG & REDEV AUTH VAR RT 05/01/2022 DD 05/23/02	300,000.00	100.0000	300,000.00	0.00
1,250,000.0000	SAINT PAUL MN PORT AUTH LEASE 4.000% 12/01/2016 DD 05/09/13	1,347,626.83	108.3970	1,354,962.50	7,335.67
1,000,000.0000	SAN ANTONIO TX WTR REVENUE 5.000% 05/15/2029 DD 11/06/13	1,088,992.62	115.6480	1,156,480.00	67,487.38
955,000.0000	SAN FRANCISCO CITY & CNTY CA 5.000% 06/15/2023 DD 06/20/13	1,102,413.54	118.7930	1,134,473.15	32,059.61
1,250,000.0000	SAN FRANCISCO CALIF CITY &CNTY 5.500% 05/01/2027 DD 07/31/13	1,332,714.53	112.5590	1,406,987.50	74,272.97
1,250,000.0000	SAN FRANCISCO CITY & CNTY CA P 5.000% 10/01/2018 DD 01/30/13	1,457,524.09	117.4550	1,468,187.50	10,663.41
1,000,000.0000	TARRANT CNTY TX CULTURAL EDU F 5.000% 08/15/2036 DD 03/13/13	1,117,505.12	109.9860	1,099,860.00	17,645.12-



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<u>SHARES/ PAR VALUE</u>	<u>SECURITY DESCRIPTION</u>	<u>COST</u>	<u>PRICE</u>	<u>MARKET VALUE</u>	<u>UNREALIZED GAIN/LOSS</u>
335,000.0000	TEXAS ST PRIV ACTIVITY BOND SU 7.000% 12/31/2038 DD 09/19/13	340,903.51	121.9720	408,606.20	67,702.69
455,000.0000	TEXAS ST PRIV ACTIVITY BOND SU 6.750% 06/30/2043 DD 09/19/13	447,822.79	119.2330	542,510.15	94,687.36
950,000.0000	TEXAS ST 5.000% 10/01/2027 DD 07/28/11	1,141,454.98	118.1580	1,122,501.00	18,953.98-
1,115,000.0000	TOBACCO SETTLEMENT AUTH WA TOB 5.250% 06/01/2032 DD 10/17/13	1,139,612.04	109.7610	1,223,835.15	84,223.11
1,100,000.0000	TOBACCO SETTLEMENT FING CORP L 5.500% 05/15/2030 DD 07/10/13	1,158,477.01	109.5880	1,205,468.00	46,990.99
1,000,000.0000	TOBACCO SETTLEMENT FING CORP N 5.000% 06/01/2018 DD 01/29/07	1,105,358.14	107.6970	1,076,970.00	28,388.14-
1,000,000.0000	UNIV OF PITTSBURGH PA OF THE C 5.000% 09/15/2028 DD 03/31/09	1,095,883.73	113.6640	1,136,640.00	40,756.27
1,250,000.0000	UNIV OF PITTSBURGH PA OF THE C 5.250% 09/15/2025 DD 07/10/09	1,495,261.89	116.8970	1,461,212.50	34,049.39-
1,250,000.0000	UNIV OF MINNESOTA MN 5.250% 12/01/2028 DD 02/15/11	1,460,889.71	118.6740	1,483,425.00	22,535.29
1,560,000.0000	UTAH ST TRANSIT AUTH SALES TAX 5.000% 06/15/2036 DD 04/10/08	1,737,757.24	110.7040	1,726,982.40	10,774.84-
1,250,000.0000	VENTURA CNTY CA PUBLIC FING AU 5.000% 11/01/2038 DD 03/07/13	1,394,678.28	110.6830	1,383,537.50	11,140.78-



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<u>SHARES/ PAR VALUE</u>	<u>SECURITY DESCRIPTION</u>	<u>COST</u>	<u>PRICE</u>	<u>MARKET VALUE</u>	<u>UNREALIZED GAIN/LOSS</u>
705,000.0000	WACO TX 4.000% 02/01/2017 DD 02/20/13	762,812.60	108.5440	765,235.20	2,422.60
1,250,000.0000	WEST VIRGINIA ST UNIV REVENUES 5.000% 10/01/2032 DD 02/13/13	1,454,030.36	113.1150	1,413,937.50	40,092.86-
500,000.0000	WISCONSIN ST 5.000% 05/01/2018 DD 04/30/08	576,211.53	115.4670	577,335.00	1,123.47
1,000,000.0000	WISCONSIN ST TRANSPRTN REVENUE 5.000% 07/01/2018 DD 03/06/13	1,158,428.53	116.0840	1,160,840.00	2,411.47
TOTAL INVESTMENTS FIXED INCOME SECURITIES		151,029,219.25		152,300,001.15	1,270,781.90
TOTAL INVESTMENT		152,074,050.18		153,344,832.08	1,270,781.90

	Market Value 06/30/14	Book Value 06/30/14	Unrealized Gain/Loss	Effective Tax Rate	Tax Effect Adjustment	Tax Adjusted Market Value
	(1)	(2)	(3) = (1) - (2)	(4)	(5) = (1)*(4)	(6) = (1) - (5)
<u>Qualified Trust</u>						
Monticello	\$ 431,693,946	\$ 360,965,328	\$ 70,728,618	27.84%	\$ 19,690,847	\$ 412,003,099
Prairie Island Unit 1	346,656,633	289,896,360	56,760,273	27.84%	15,802,060	330,854,573
Prairie Island Unit 2	370,929,520	309,805,857	61,123,663	27.84%	17,016,828	353,912,692
<u>Escrow Fund</u>						
Monticello	\$ 39,296,550	\$ 38,694,856	\$ 601,695	41.37%	\$ 248,921	\$ 39,047,629
Prairie Island Unit 1	26,556,053	26,441,477	114,576	41.37%	47,400	26,508,653
Prairie Island Unit 2	52,597,599	52,346,488	251,110	41.37%	103,884	52,493,714
<u>Total</u>						
Monticello	\$ 470,990,497	\$ 399,660,184	\$ 71,330,313		\$ 19,939,768	\$ 451,050,728
Prairie Island Unit 1	373,212,686	316,337,837	56,874,849		15,849,460	357,363,226
Prairie Island Unit 2	423,527,119	362,152,346	61,374,773		17,120,712	406,406,407
	<u>\$ 1,267,730,301</u>	<u>\$ 1,078,150,366</u>	<u>\$ 189,579,935</u>		<u>\$ 52,909,941</u>	<u>\$ 1,214,820,361</u>

PRESENT TO PROPOSED ACCRUAL COMPARISON

	Present	Proposed	Difference
Monticello	\$13,236,764	\$10,413,729	(\$2,823,035)
Prairie Island Unit 1	0	0	0
Prairie Island Unit 2	952,368	0	(952,368)
TOTAL	\$14,189,132	\$10,413,729	(\$3,775,403)

Levelized (beginning of year payment, mid year interest)

ANNUAL ACCRUAL SUMMARY

	Remaining Life (yrs)	2014-2015 Operational Earnings Rate	2016+ Operational Earnings Rate	Post-Shutdown Earnings Rate	Present Value to Decommission	Market Value Balance 6/30/2014	Tax-Effect Adjustment	Tax-Adjusted Fund Balance 6/30/2014	2016-2018 Decommissioning Accrual
	(7)	(8)	(9)	(9)	(6)	(10)	(11)	(12)	(13)
Monticello	15.75	5.31%	6.18%	5.23%	\$1,402,848,266	\$470,990,497	\$19,939,768	\$451,050,728	\$10,413,729
Prairie Island Unit 1	18.80	5.50%	6.24%	5.16%	1,071,957,336	373,212,686	15,849,460	357,363,226	0
Prairie Island Unit 2	19.80	5.53%	6.30%	5.06%	1,331,312,607	423,527,119	17,120,712	406,406,407	0
TOTAL DECOMMISSIONING ACCRUAL					\$3,806,118,210	\$1,267,730,301	\$52,909,941	\$1,214,820,361	\$10,413,729

INPUT DATA

Escalation Rate (Operation/Radiological)	4.36% (a)
Escalation Rate (ISFSI/Site Restoration)	3.36% (a)
Jurisdictional Factor	74.3399% (b)
IRS Tax Qualified Percent	100.00% (c)
External Percent	100.00% (d)

NOTES

Input Data

- (a) = Inflation rate from current filing documentation
(b) = 2014 Minnesota jurisdictional percent from 2013 electric rate case
(c) = IRS qualifying percent based upon 2005 Energy Policy Act
(d) = Recommended external funding

Amount to Recover

- (1) = Current cost estimate by year from TLG Cost Study, 2014.
(2) = Jurisdictional Nominal Cost = (1) x (b)
(3) = Escalation factor based upon the applicable escalation rate for future value calculation
(4) = Future Value of jurisdictional nominal cost
(5) = Discount factor based upon the applicable earnings rate for present value calculation
(6) = Present value to decommission at the start of 2015

Decommissioning Accrual

- (7) = Remaining life as of 1/1/15 based on E,G002/D-14-181
(8) = Fund earnings rate approved in 2011 Triennial Decommissioning Filing
(9) = Fund earnings rates proposed in 2014 Triennial Decommissioning Filing
(10) = Total Market Value Fund Balance as of June 30, 2014
(11) = Tax Effect Adjustment from Schedule G
(12) = (10) - (11)

Levelized (beginning of year payment, mid year interest)

AMOUNT TO RECOVER

	Cost Estimate Nominal \$s	Jurisdictional Cost in Nominal \$s	Escalation Factor	Jurisdictional Cost in Future \$'s	Discount Factor	Present Value to Decommission
	(1)	(2)	(3)	(4)	(5)	(6)
Monticello			4.36%			
<i>Factors</i>	<i>2014</i>	<i>74.3399%</i>	<i>3.36%</i>		<i>5.23%</i>	<i>2030</i>
2030	\$33,620,895	\$24,993,729	1.9795	\$49,473,905	0.95030	\$47,015,019
2031	113,775,507	84,580,562	2.0658	174,722,873	0.90307	157,786,783
2032	155,061,147	115,272,253	2.1558	248,506,669	0.85819	213,264,877
2033	125,763,852	93,492,682	2.2498	210,341,496	0.81553	171,540,502
2034	90,107,344	66,985,681	2.3479	157,276,336	0.77500	121,889,285
2035	81,269,609	60,415,721	2.4503	148,035,351	0.73648	109,025,482
2036	19,565,918	14,545,278	2.5571	37,193,887	0.69988	26,031,223
2037	19,512,459	14,505,537	2.6686	38,709,487	0.66509	25,745,472
2038	19,512,459	14,505,537	2.7850	40,397,221	0.63204	25,532,619
2039	19,512,459	14,505,537	2.9064	42,158,540	0.60063	25,321,525
2040	19,565,918	14,545,278	3.0331	44,117,191	0.57077	25,180,977
2041	19,512,459	14,505,537	3.1653	45,914,906	0.54241	24,904,559
2042	19,512,459	14,505,537	3.3033	47,916,796	0.51545	24,698,658
2043	20,185,138	15,005,605	3.4474	51,729,889	0.48983	25,338,888
2044	19,565,918	14,545,278	3.5977	52,329,205	0.46549	24,358,502
2045	71,494,057	53,148,588	3.7545	199,548,244	0.44235	88,270,337
2046	61,772,003	45,921,226	3.9182	179,930,062	0.42037	75,636,432
2047	31,241,490	23,224,883	4.0891	94,968,122	0.39947	37,937,227
2048	28,191,379	20,957,434	4.2674	89,432,733	0.37962	33,950,382
2049	6,094,520	4,530,658	4.4534	20,176,867	0.36075	7,278,843
2050	7,776,215	5,780,828	4.6476	26,866,840	0.34282	9,210,551
2051	6,094,520	4,530,658	4.8502	21,974,646	0.32578	7,158,983
2052	8,129,252	6,043,275	5.0617	30,589,123	0.30959	9,470,151
2053	7,776,215	5,780,828	5.2824	30,536,468	0.29421	8,983,987
2054	6,094,520	4,530,658	5.5127	24,976,069	0.27958	6,982,884
2055	7,776,215	5,780,828	3.8766	22,410,037	0.26569	5,954,067
2056	7,792,912	5,793,241	4.0069	23,212,751	0.25248	5,860,818
2057	6,094,520	4,530,658	4.1415	18,763,714	0.23993	4,502,055
2058	8,112,554	6,030,862	4.2807	25,816,028	0.22801	5,886,293
2059	6,094,520	4,530,658	4.4245	20,045,819	0.21668	4,343,469
2060	7,792,912	5,793,241	4.5731	26,493,334	0.20591	5,455,191
2061	6,094,520	4,530,658	4.7268	21,415,529	0.19567	4,190,468
2062	7,776,215	5,780,828	4.8856	28,242,952	0.18595	5,251,753
2063	6,094,520	4,530,658	5.0498	22,878,830	0.17671	4,042,857
2064	7,792,912	5,793,241	5.2195	30,237,551	0.16792	5,077,637
2065	6,094,520	4,530,658	5.3948	24,442,116	0.15958	3,900,446
2066	16,418,000	12,205,120	5.5761	68,056,886	0.15165	10,320,672
2067	8,986,000	6,680,181	5.7635	38,500,887	0.14411	5,548,391
	\$1,113,628,034	\$827,869,615		\$2,478,339,363		\$1,402,848,266

Levelized (beginning of year payment, mid year interest)

AMOUNT TO RECOVER

	Cost Estimate Nominal \$s	Jurisdictional Cost in Nominal \$s	Escalation Factor	Jurisdictional Cost in Future \$'s	Discount Factor	Present Value to Decommission
	(1)	(2)	(3)	(4)	(5)	(6)
Prairie Island Unit 1			4.36%			
<i>Factors</i>	<i>2014</i>	<i>74.3399%</i>	<i>3.36%</i>		<i>5.16%</i>	<i>2033</i>
2033	\$26,355,519	\$19,592,658	2.2498	\$44,079,910	0.95093	\$41,916,993
2034	82,659,910	61,449,268	2.3479	144,277,340	0.90427	130,465,887
2035	133,567,487	99,293,894	2.4503	243,297,710	0.85990	209,211,854
2036	105,786,813	78,641,778	2.5571	201,095,741	0.81771	164,437,385
2037	57,999,449	43,116,714	2.6686	115,061,299	0.77758	89,469,784
2038	14,612,512	10,862,922	2.7850	30,252,714	0.73943	22,369,737
2039	14,612,512	10,862,922	2.9064	31,571,733	0.70315	22,199,560
2040	14,652,546	10,892,683	3.0331	33,038,530	0.66864	22,091,036
2041	14,612,512	10,862,922	3.1653	34,384,804	0.63584	21,863,081
2042	14,612,512	10,862,922	3.3033	35,883,982	0.60464	21,696,758
2043	14,612,512	10,862,922	3.4474	37,448,524	0.57497	21,531,701
2044	14,652,546	10,892,683	3.5977	39,188,351	0.54676	21,426,442
2045	14,612,512	10,862,922	3.7545	40,785,223	0.51993	21,205,345
2046	14,612,512	10,862,922	3.9182	42,563,459	0.49442	21,044,026
2047	14,612,512	10,862,922	4.0891	44,419,225	0.47016	20,883,934
2048	14,652,546	10,892,683	4.2674	46,482,906	0.44709	20,781,842
2049	19,092,664	14,193,461	4.4534	63,209,272	0.42515	26,873,298
2050	33,995,301	25,272,062	4.6476	117,453,837	0.40429	47,485,041
2051	22,267,982	16,553,988	4.8502	80,290,331	0.38445	30,867,558
2052	21,089,703	15,678,058	5.0617	79,357,308	0.36559	29,011,847
2053	11,774,491	8,753,141	5.2824	46,237,323	0.34765	16,074,244
2054	4,196,882	3,119,957	3.7506	11,701,690	0.33059	3,868,440
2055	3,524,204	2,619,889	3.8766	10,156,296	0.31437	3,192,803
2056	3,533,859	2,627,066	4.0069	10,526,308	0.29894	3,146,750
2057	4,196,882	3,119,957	4.1415	12,921,297	0.28427	3,673,175
2058	3,524,204	2,619,889	4.2807	11,214,834	0.27032	3,031,642
2059	4,196,882	3,119,957	4.4245	13,804,195	0.25706	3,548,506
2060	3,533,859	2,627,066	4.5731	12,013,957	0.24445	2,936,770
2061	4,196,882	3,119,957	4.7268	14,747,422	0.23245	3,428,067
2062	3,524,204	2,619,889	4.8856	12,799,791	0.22105	2,829,343
2063	4,196,882	3,119,957	5.0498	15,755,098	0.21020	3,311,717
2064	3,533,859	2,627,066	5.2195	13,711,851	0.19989	2,740,802
2065	15,247,144	11,334,707	5.3948	61,148,783	0.19008	11,623,014
2066	2,294,203	1,705,507	5.5761	9,510,068	0.18075	1,718,953
	\$735,146,998	\$546,507,311		\$1,760,391,114		\$1,071,957,336

Levelized (beginning of year payment, mid year interest)

AMOUNT TO RECOVER

	Cost Estimate Nominal \$s	Jurisdictional Cost in Nominal \$s	Escalation Factor	Jurisdictional Cost in Future \$'s	Discount Factor	Present Value to Decommission
	(1)	(2)	(3)	(4)	(5)	(6)
Prairie Island Unit 2			4.36%			
<i>Factors</i>	<i>2014</i>	<i>74.3399%</i>	<i>3.36%</i>		<i>5.06%</i>	<i>2034</i>
2034	\$13,161,081	\$9,783,930	2.3479	\$22,971,786	0.95184	\$21,865,397
2035	79,117,394	58,815,767	2.4503	144,115,019	0.90599	130,567,308
2036	120,647,384	89,689,107	2.5571	229,344,985	0.86236	197,777,580
2037	117,466,225	87,324,237	2.6686	233,033,533	0.82082	191,279,678
2038	100,375,226	74,618,811	2.7850	207,809,796	0.78129	162,359,997
2039	29,012,395	21,567,776	2.9064	62,684,061	0.74366	46,615,758
2040	23,603,630	17,546,908	3.0331	53,221,415	0.70785	37,672,518
2041	23,539,139	17,498,965	3.1653	55,390,115	0.67375	37,319,266
2042	23,539,139	17,498,965	3.3033	57,805,124	0.64130	37,070,613
2043	23,539,139	17,498,965	3.4474	60,325,428	0.61042	36,823,617
2044	23,603,630	17,546,908	3.5977	63,128,097	0.58102	36,678,481
2045	23,539,139	17,498,965	3.7545	65,700,481	0.55303	36,334,551
2046	23,539,139	17,498,965	3.9182	68,565,022	0.52640	36,092,459
2047	23,539,139	17,498,965	4.0891	71,554,457	0.50104	35,851,980
2048	23,603,630	17,546,908	4.2674	74,878,818	0.47691	35,710,673
2049	27,290,414	20,287,658	4.4534	90,349,214	0.45394	41,013,425
2050	39,197,270	29,139,199	4.6476	135,426,653	0.43208	58,515,161
2051	27,586,755	20,507,957	4.8502	99,467,913	0.41127	40,908,153
2052	26,123,486	19,420,165	5.0617	98,298,660	0.39146	38,480,177
2053	14,140,094	10,511,727	5.2824	55,526,825	0.37261	20,689,734
2054	4,196,882	3,119,957	3.7506	11,701,690	0.35466	4,150,145
2055	3,524,204	2,619,889	3.8766	10,156,296	0.33758	3,428,567
2056	3,533,859	2,627,066	4.0069	10,526,308	0.32132	3,382,330
2057	4,196,882	3,119,957	4.1415	12,921,297	0.30585	3,951,924
2058	3,524,204	2,619,889	4.2807	11,214,834	0.29112	3,264,810
2059	4,196,882	3,119,957	4.4245	13,804,195	0.27709	3,825,065
2060	3,533,859	2,627,066	4.5731	12,013,957	0.26375	3,168,665
2061	4,196,882	3,119,957	4.7268	14,747,422	0.25105	3,702,278
2062	3,524,204	2,619,889	4.8856	12,799,791	0.23895	3,058,570
2063	4,196,882	3,119,957	5.0498	15,755,098	0.22745	3,583,432
2064	3,533,859	2,627,066	5.2195	13,711,851	0.21649	2,968,498
2065	13,895,374	10,329,803	5.3948	55,727,499	0.20606	11,483,463
2066	2,113,441	1,571,129	5.5761	8,760,763	0.19614	1,718,335
	\$864,330,868	\$642,542,430		\$2,153,438,407		\$1,331,312,607
	\$2,713,105,900	\$2,016,919,355		\$6,392,168,883		\$3,806,118,210

Levelized (beginning of year payment, mid year interest)

EXTERNAL FUND CALCULATION

Monticello

External Levelized

	Beginning Balance	Assumed Interest	Annuity Transfer	Decommissioning Payment	Annuity	Ending Balance	Book Expense
2014	\$453,587,199	\$12,042,740	-	-	-	\$465,629,939	-
2015	465,629,939	25,076,386	-	-	13,236,764	503,943,089	13,236,764
2016	503,943,089	31,465,467	-	-	10,413,729	545,822,286	10,413,729
2017	545,822,286	34,053,601	-	-	10,413,729	590,289,616	10,413,729
2018	590,289,616	36,801,683	-	-	10,413,729	637,505,029	10,413,729
2019	637,505,029	39,719,595	-	-	10,413,729	687,638,353	10,413,729
2020	687,638,353	42,817,834	-	-	10,413,729	740,869,917	10,413,729
2021	740,869,917	46,107,545	-	-	10,413,729	797,391,192	10,413,729
2022	797,391,192	49,600,560	-	-	10,413,729	857,405,481	10,413,729
2023	857,405,481	53,309,443	-	-	10,413,729	921,128,653	10,413,729
2024	921,128,653	57,247,535	-	-	10,413,729	988,789,918	10,413,729
2025	988,789,918	61,429,001	-	-	10,413,729	1,060,632,649	10,413,729
2026	1,060,632,649	65,868,882	-	-	10,413,729	1,136,915,260	10,413,729
2027	1,136,915,260	70,583,147	-	-	10,413,729	1,217,912,137	10,413,729
2028	1,217,912,137	75,588,754	-	-	10,413,729	1,303,914,620	10,413,729
2029	1,303,914,620	80,903,708	-	-	10,413,729	1,395,232,058	10,413,729
2030	1,395,232,058	73,174,876	-	(\$49,473,905)	7,810,297	1,426,743,326	7,810,297
2031	1,426,743,326	74,618,676	-	(174,722,873)	-	1,326,639,128	-
2032	1,326,639,128	69,383,226	-	(248,506,669)	-	1,147,515,686	-
2033	1,147,515,686	60,015,070	-	(210,341,496)	-	997,189,260	-
2034	997,189,260	52,152,998	-	(157,276,336)	-	892,065,923	-
2035	892,065,923	46,655,048	-	(148,035,351)	-	790,685,619	-
2036	790,685,619	41,352,858	-	(37,193,887)	-	794,844,590	-
2037	794,844,590	41,570,372	-	(38,709,487)	-	797,705,474	-
2038	797,705,474	41,719,996	-	(40,397,221)	-	799,028,250	-
2039	799,028,250	41,789,177	-	(42,158,540)	-	798,658,887	-
2040	798,658,887	41,769,860	-	(44,117,191)	-	796,311,556	-
2041	796,311,556	41,647,094	-	(45,914,906)	-	792,043,744	-
2042	792,043,744	41,423,888	-	(47,916,796)	-	785,550,836	-
2043	785,550,836	41,084,309	-	(51,729,889)	-	774,905,256	-
2044	774,905,256	40,527,545	-	(52,329,205)	-	763,103,596	-
2045	763,103,596	39,910,318	-	(199,548,244)	-	603,465,670	-
2046	603,465,670	31,561,255	-	(179,930,062)	-	455,096,863	-
2047	455,096,863	23,801,566	-	(94,968,122)	-	383,930,307	-
2048	383,930,307	20,079,555	-	(89,432,733)	-	314,577,129	-
2049	314,577,129	16,452,384	-	(20,176,867)	-	310,852,645	-
2050	310,852,645	16,257,593	-	(26,866,840)	-	300,243,398	-
2051	300,243,398	15,702,730	-	(21,974,646)	-	293,971,483	-
2052	293,971,483	15,374,709	-	(30,589,123)	-	278,757,068	-
2053	278,757,068	14,578,995	-	(30,536,468)	-	262,799,595	-
2054	262,799,595	13,744,419	-	(24,976,069)	-	251,567,944	-
2055	251,567,944	13,157,003	-	(22,410,037)	-	242,314,910	-
2056	242,314,910	12,673,070	-	(23,212,751)	-	231,775,229	-
2057	231,775,229	12,121,844	-	(18,763,714)	-	225,133,359	-
2058	225,133,359	11,774,475	-	(25,816,028)	-	211,091,806	-
2059	211,091,806	11,040,101	-	(20,045,819)	-	202,086,088	-
2060	202,086,088	10,569,102	-	(26,493,334)	-	186,161,857	-
2061	186,161,857	9,736,265	-	(21,415,529)	-	174,482,593	-
2062	174,482,593	9,125,440	-	(28,242,952)	-	155,365,080	-
2063	155,365,080	8,125,594	-	(22,878,830)	-	140,611,844	-
2064	140,611,844	7,353,999	-	(30,237,551)	-	117,728,292	-
2065	117,728,292	6,157,190	-	(24,442,116)	-	99,443,366	-
2066	99,443,366	5,200,888	-	(68,056,886)	-	36,587,368	-
2067	36,587,368	1,913,519	-	(38,500,887)	-	(0)	-

Levelized (beginning of year payment, mid year interest)

EXTERNAL FUND CALCULATION

Prairie Island Unit 1

External Levelized

	Beginning Balance	Assumed Interest	Annuity Transfer	Decommissioning Payment	Annuity	Ending Balance	Book Expense
2014	\$353,383,409	\$9,718,044	-	-	-	\$363,101,453	-
2015	363,101,453	19,970,580	-	-	-	383,072,033	-
2016	383,072,033	23,903,695	-	-	-	406,975,728	-
2017	406,975,728	25,395,285	-	-	-	432,371,013	-
2018	432,371,013	26,979,951	-	-	-	459,350,964	-
2019	459,350,964	28,663,500	-	-	-	488,014,465	-
2020	488,014,465	30,452,103	-	-	-	518,466,567	-
2021	518,466,567	32,352,314	-	-	-	550,818,881	-
2022	550,818,881	34,371,098	-	-	-	585,189,979	-
2023	585,189,979	36,515,855	-	-	-	621,705,834	-
2024	621,705,834	38,794,444	-	-	-	660,500,278	-
2025	660,500,278	41,215,217	-	-	-	701,715,495	-
2026	701,715,495	43,787,047	-	-	-	745,502,542	-
2027	745,502,542	46,519,359	-	-	-	792,021,901	-
2028	792,021,901	49,422,167	-	-	-	841,444,067	-
2029	841,444,067	52,506,110	-	-	-	893,950,177	-
2030	893,950,177	55,782,491	-	-	-	949,732,668	-
2031	949,732,668	59,263,318	-	-	-	1,008,995,987	-
2032	1,008,995,987	62,961,350	-	-	-	1,071,957,336	-
2033	1,071,957,336	55,312,999	-	(\$44,079,910)	-	1,083,190,425	-
2034	1,083,190,425	55,892,626	-	(144,277,340)	-	994,805,711	-
2035	994,805,711	51,331,975	-	(243,297,710)	-	802,839,976	-
2036	802,839,976	41,426,543	-	(201,095,741)	-	643,170,778	-
2037	643,170,778	33,187,612	-	(115,061,299)	-	561,297,091	-
2038	561,297,091	28,962,930	-	(30,252,714)	-	560,007,306	-
2039	560,007,306	28,896,377	-	(31,571,733)	-	557,331,950	-
2040	557,331,950	28,758,329	-	(33,038,530)	-	553,051,750	-
2041	553,051,750	28,537,470	-	(34,384,804)	-	547,204,415	-
2042	547,204,415	28,235,748	-	(35,883,982)	-	539,556,181	-
2043	539,556,181	27,841,099	-	(37,448,524)	-	529,948,757	-
2044	529,948,757	27,345,356	-	(39,188,351)	-	518,105,761	-
2045	518,105,761	26,734,257	-	(40,785,223)	-	504,054,796	-
2046	504,054,796	26,009,227	-	(42,563,459)	-	487,500,565	-
2047	487,500,565	25,155,029	-	(44,419,225)	-	468,236,368	-
2048	468,236,368	24,160,997	-	(46,482,906)	-	445,914,459	-
2049	445,914,459	23,009,186	-	(63,209,272)	-	405,714,373	-
2050	405,714,373	20,934,862	-	(117,453,837)	-	309,195,397	-
2051	309,195,397	15,954,483	-	(80,290,331)	-	244,859,549	-
2052	244,859,549	12,634,753	-	(79,357,308)	-	178,136,993	-
2053	178,136,993	9,191,869	-	(46,237,323)	-	141,091,538	-
2054	141,091,538	7,280,323	-	(11,701,690)	-	136,670,172	-
2055	136,670,172	7,052,181	-	(10,156,296)	-	133,566,056	-
2056	133,566,056	6,892,008	-	(10,526,308)	-	129,931,756	-
2057	129,931,756	6,704,479	-	(12,921,297)	-	123,714,938	-
2058	123,714,938	6,383,691	-	(11,214,834)	-	118,883,795	-
2059	118,883,795	6,134,404	-	(13,804,195)	-	111,214,003	-
2060	111,214,003	5,738,643	-	(12,013,957)	-	104,938,688	-
2061	104,938,688	5,414,836	-	(14,747,422)	-	95,606,103	-
2062	95,606,103	4,933,275	-	(12,799,791)	-	87,739,587	-
2063	87,739,587	4,527,363	-	(15,755,098)	-	76,511,852	-
2064	76,511,852	3,948,012	-	(13,711,851)	-	66,748,013	-
2065	66,748,013	3,444,197	-	(61,148,783)	-	9,043,427	-
2066	9,043,427	466,641	-	(9,510,068)	-	(0)	-

Levelized (beginning of year payment, mid year interest)

EXTERNAL FUND CALCULATION

Prairie Island Unit 2

External Levelized

	Beginning Balance	Assumed Interest	Annuity Transfer	Decommissioning Payment	Annuity	Ending Balance	Book Expense
2014	\$407,849,753	\$11,277,046	-	-	-	\$419,126,798	
2015	419,126,798	23,204,045	-	-	952,368	443,283,211	952,368
2016	443,283,211	27,926,842	-	-	-	471,210,054	-
2017	471,210,054	29,686,233	-	-	-	500,896,287	-
2018	500,896,287	31,556,466	-	-	-	532,452,753	-
2019	532,452,753	33,544,523	-	-	-	565,997,276	-
2020	565,997,276	35,657,828	-	-	-	601,655,105	-
2021	601,655,105	37,904,272	-	-	-	639,559,377	-
2022	639,559,377	40,292,241	-	-	-	679,851,617	-
2023	679,851,617	42,830,652	-	-	-	722,682,269	-
2024	722,682,269	45,528,983	-	-	-	768,211,252	-
2025	768,211,252	48,397,309	-	-	-	816,608,561	-
2026	816,608,561	51,446,339	-	-	-	868,054,900	-
2027	868,054,900	54,687,459	-	-	-	922,742,359	-
2028	922,742,359	58,132,769	-	-	-	980,875,128	-
2029	980,875,128	61,795,133	-	-	-	1,042,670,261	-
2030	1,042,670,261	65,688,226	-	-	-	1,108,358,487	-
2031	1,108,358,487	69,826,585	-	-	-	1,178,185,072	-
2032	1,178,185,072	74,225,660	-	-	-	1,252,410,731	-
2033	1,252,410,731	78,901,876	-	-	-	1,331,312,607	-
2034	1,331,312,607	67,364,418	-	(22,971,786)	-	1,375,705,240	-
2035	1,375,705,240	69,610,685	-	(144,115,019)	-	1,301,200,906	-
2036	1,301,200,906	65,840,766	-	(229,344,985)	-	1,137,696,687	-
2037	1,137,696,687	57,567,452	-	(233,033,533)	-	962,230,606	-
2038	962,230,606	48,688,869	-	(207,809,796)	-	803,109,679	-
2039	803,109,679	40,637,350	-	(62,684,061)	-	781,062,967	-
2040	781,062,967	39,521,786	-	(53,221,415)	-	767,363,338	-
2041	767,363,338	38,828,585	-	(55,390,115)	-	750,801,808	-
2042	750,801,808	37,990,571	-	(57,805,124)	-	730,987,255	-
2043	730,987,255	36,987,955	-	(60,325,428)	-	707,649,782	-
2044	707,649,782	35,807,079	-	(63,128,097)	-	680,328,764	-
2045	680,328,764	34,424,635	-	(65,700,481)	-	649,052,918	-
2046	649,052,918	32,842,078	-	(68,565,022)	-	613,329,973	-
2047	613,329,973	31,034,497	-	(71,554,457)	-	572,810,013	-
2048	572,810,013	28,984,187	-	(74,878,818)	-	526,915,381	-
2049	526,915,381	26,661,918	-	(90,349,214)	-	463,228,085	-
2050	463,228,085	23,439,341	-	(135,426,653)	-	351,240,773	-
2051	351,240,773	17,772,783	-	(99,467,913)	-	269,545,643	-
2052	269,545,643	13,639,010	-	(98,298,660)	-	184,885,992	-
2053	184,885,992	9,355,231	-	(55,526,825)	-	138,714,399	-
2054	138,714,399	7,018,949	-	(11,701,690)	-	134,031,657	-
2055	134,031,657	6,782,002	-	(10,156,296)	-	130,657,362	-
2056	130,657,362	6,611,263	-	(10,526,308)	-	126,742,317	-
2057	126,742,317	6,413,161	-	(12,921,297)	-	120,234,181	-
2058	120,234,181	6,083,850	-	(11,214,834)	-	115,103,197	-
2059	115,103,197	5,824,222	-	(13,804,195)	-	107,123,223	-
2060	107,123,223	5,420,435	-	(12,013,957)	-	100,529,701	-
2061	100,529,701	5,086,803	-	(14,747,422)	-	90,869,082	-
2062	90,869,082	4,597,976	-	(12,799,791)	-	82,667,267	-
2063	82,667,267	4,182,964	-	(15,755,098)	-	71,095,132	-
2064	71,095,132	3,597,414	-	(13,711,851)	-	60,980,695	-
2065	60,980,695	3,085,623	-	(55,727,499)	-	8,338,819	-
2066	8,338,819	421,944	-	(8,760,763)	-	(0)	-

PRESENT TO PROPOSED ACCRUAL COMPARISON

	Present	Proposed	Difference
Monticello	\$13,236,764	\$13,392,226	\$155,462
Prairie Island Unit 1	0	49,264	49,264
Prairie Island Unit 2	952,368	589,341	(363,027)
TOTAL	\$14,189,132	\$14,030,831	(\$158,301)

Levelized (beginning of year payment, mid year interest)

ANNUAL ACCRUAL SUMMARY

	2014-2015 Remaining Life (yrs)	2014-2015 Operational Earnings Rate	2016+ Operational Earnings Rate	Post-Shutdown Earnings Rate	Present Value to Decommission	Market Value Balance 6/30/2014	Tax-Effect Adjustment	Tax-Adjusted Fund Balance 6/30/2014	2016-2018 Decommissioning Accrual
	(7)	(8)	(9)	(9)	(6)	(10)	(11)	(12)	(13)
Monticello	15.75	5.35%	6.20%	5.51%	\$1,468,176,383	\$470,990,497	\$19,939,768	\$451,050,728	\$13,392,226
Prairie Island Unit 1	18.80	5.50%	6.24%	5.35%	1,085,532,479	373,212,686	15,849,460	357,363,226	49,264
Prairie Island Unit 2	19.80	5.53%	6.30%	5.23%	1,346,402,637	423,527,119	17,120,712	406,406,407	589,341
TOTAL DECOMMISSIONING ACCRUAL					\$3,900,111,500	\$1,267,730,301	\$52,909,941	\$1,214,820,361	\$14,030,831

INPUT DATA

Escalation Rate (Operation/Radiological)	4.36% (a)
Escalation Rate (ISFSI/Site Restoration)	3.36% (a)
Jurisdictional Factor	74.3399% (b)
IRS Tax Qualified Percent	100.00% (c)
External Percent	100.00% (d)

NOTES

Input Data

- (a) = Inflation rate from current filing documentation
(b) = 2014 Minnesota jurisdictional percent from 2013 electric rate case
(c) = IRS qualifying percent based upon 2005 Energy Policy Act
(d) = Recommended external funding

Amount to Recover

- (1) = Current cost estimate by year from TLG Cost Study, 2014.
(2) = Jurisdictional Nominal Cost = (1) x (b)
(3) = Escalation factor based upon the applicable escalation rate for future value calculation
(4) = Future Value of jurisdictional nominal cost
(5) = Discount factor based upon the applicable earnings rate for present value calculation
(6) = Present value to decommission at the start of 2015

Decommissioning Accrual

- (7) = Remaining life as of 1/1/15 based on E,G002/D-14-181
(8) = Fund earnings rate approved in 2011 Triennial Decommissioning Filing
(9) = Fund earnings rates proposed in 2014 Triennial Decommissioning Filing
(10) = Total Market Value Fund Balance as of June 30, 2014
(11) = Tax Effect Adjustment from Schedule G
(12) = (10) - (11)

Levelized (beginning of year payment, mid year interest)

AMOUNT TO RECOVER

	Cost Estimate Nominal \$s	Jurisdictional Cost in Nominal \$s	Escalation Factor	Jurisdictional Cost in Future \$'s	Discount Factor	Present Value to Decommission
	(1)	(2)	(3)	(4)	(5)	(6)
Monticello			4.36%			
<i>Factors</i>	<i>2014</i>	<i>74.3399%</i>	<i>3.36%</i>		<i>5.51%</i>	<i>2030</i>
2030	\$30,141,775	\$22,407,356	1.9795	\$44,355,360	0.94778	\$42,039,123
2031	106,231,518	78,972,371	2.0658	163,141,124	0.89828	146,546,409
2032	155,122,607	115,317,942	2.1558	248,602,420	0.85137	211,652,642
2033	126,314,980	93,902,390	2.2498	211,261,596	0.80691	170,469,095
2034	91,161,917	67,769,649	2.3479	159,116,359	0.76477	121,687,418
2035	82,057,516	61,001,449	2.4503	149,471,852	0.72483	108,341,682
2036	19,627,294	14,590,905	2.5571	37,310,403	0.68698	25,631,500
2037	19,573,836	14,551,164	2.6686	38,831,235	0.65110	25,283,017
2038	19,573,836	14,551,164	2.7850	40,524,991	0.61710	25,007,972
2039	19,573,836	14,551,164	2.9064	42,291,502	0.58488	24,735,454
2040	19,627,294	14,590,905	3.0331	44,255,673	0.55433	24,532,247
2041	19,573,836	14,551,164	3.1653	46,058,798	0.52538	24,198,371
2042	19,573,836	14,551,164	3.3033	48,066,859	0.49795	23,934,892
2043	19,573,836	14,551,164	3.4474	50,163,681	0.47194	23,674,248
2044	19,627,294	14,590,905	3.5977	52,493,698	0.44730	23,480,431
2045	69,600,296	51,740,768	3.7545	194,260,715	0.42394	82,354,887
2046	60,329,456	44,848,838	3.9182	175,726,718	0.40180	70,606,995
2047	30,338,841	22,553,854	4.0891	92,224,965	0.38082	35,121,111
2048	27,281,620	20,281,121	4.2674	86,547,654	0.36093	31,237,645
2049	5,989,212	4,452,372	4.4534	19,828,195	0.34208	6,782,829
2050	14,680,018	10,913,106	4.6476	50,719,751	0.32422	16,444,358
2051	19,430,500	14,444,608	4.8502	70,059,240	0.30728	21,527,803
2052	11,529,270	8,570,844	5.0617	43,383,041	0.29124	12,634,877
2053	17,847,006	13,267,441	5.2824	70,083,930	0.27603	19,345,267
2054	22,597,489	16,798,944	5.5127	92,607,536	0.26161	24,227,057
2055	5,927,836	4,406,746	5.7666	17,083,190	0.24795	4,235,777
2056	5,944,077	4,418,819	6.0069	17,705,766	0.23500	4,160,855
2057	5,927,836	4,406,746	6.2537	18,250,537	0.22273	4,064,942
2058	5,927,836	4,406,746	6.4807	18,863,956	0.21110	3,982,181
2059	5,927,836	4,406,746	6.7145	19,497,646	0.20007	3,900,894
2060	5,944,077	4,418,819	6.9571	20,207,701	0.18963	3,831,986
2061	5,927,836	4,406,746	7.2068	20,829,806	0.17972	3,743,533
2062	5,927,836	4,406,746	7.4686	21,529,597	0.17034	3,667,352
2063	5,927,836	4,406,746	7.7428	22,253,184	0.16144	3,592,554
2064	5,944,077	4,418,819	8.0295	23,064,026	0.15301	3,529,027
2065	5,927,836	4,406,746	8.3248	23,773,512	0.14502	3,447,635
2066	5,927,836	4,406,746	8.6321	24,572,455	0.13745	3,377,484
2067	5,927,836	4,406,746	8.9415	25,398,279	0.13027	3,308,634
2068	5,944,077	4,418,819	9.2527	26,323,347	0.12347	3,250,144
2069	5,927,836	4,406,746	9.5661	27,133,655	0.11702	3,175,180
2070	5,927,836	4,406,746	9.8914	28,044,970	0.11091	3,110,468
2071	5,927,836	4,406,746	10.2284	28,987,573	0.10512	3,047,174
2072	5,944,077	4,418,819	10.5770	30,043,550	0.09963	2,993,239
2073	5,927,836	4,406,746	10.9324	30,967,965	0.09442	2,923,995
2074	5,927,836	4,406,746	11.2949	32,008,838	0.08949	2,864,471
2075	5,927,836	4,406,746	11.6644	33,084,084	0.08482	2,806,192
2076	5,944,077	4,418,819	12.0410	34,289,593	0.08039	2,756,540
2077	6,866,280	5,104,384	12.4246	40,940,220	0.07619	3,119,235
2078	8,212,367	6,105,063	12.8151	50,611,580	0.07221	3,654,662
2079	7,876,028	5,855,029	13.2116	50,169,983	0.06844	3,433,634
2080	7,892,998	5,867,645	13.6141	51,967,381	0.06487	3,371,124
2081	7,876,028	5,855,029	14.0225	53,597,517	0.06148	3,295,175
2082	8,212,367	6,105,063	14.4369	57,764,271	0.05827	3,365,924
2083	7,876,028	5,855,029	14.8584	57,259,837	0.05523	3,162,461
2084	7,892,998	5,867,645	15.2859	59,311,325	0.05234	3,104,355
2085	7,876,028	5,855,029	15.7204	61,172,753	0.04961	3,034,780
2086	8,212,367	6,105,063	16.1618	65,927,961	0.04702	3,099,933
2087	7,876,028	5,855,029	16.6093	65,352,658	0.04456	2,912,114
2088	10,348,028	7,692,711	17.0628	88,749,263	0.04224	3,748,769
2089	7,876,028	5,855,029	17.5283	69,817,703	0.04003	2,794,803
2090	16,469,129	12,243,129	18.0000	150,897,790	0.03794	5,725,062
2091	9,064,000	6,738,166	18.4833	85,838,840	0.03596	3,086,765
	\$1,307,915,460	\$972,302,632		\$3,824,679,609		\$1,468,176,383

Levelized (beginning of year payment, mid year interest)

AMOUNT TO RECOVER

	Cost Estimate Nominal \$s	Jurisdictional Cost in Nominal \$s	Escalation Factor	Jurisdictional Cost in Future \$'s	Discount Factor	Present Value to Decommission
	(1)	(2)	(3)	(4)	(5)	(6)
Prairie Island Unit 1			4.36%			
<i>Factors</i>	<i>2014</i>	<i>74.3399%</i>	<i>3.36%</i>		<i>5.35%</i>	<i>2033</i>
2033	\$26,355,519	\$19,592,658	2.2498	\$44,079,562	0.94922	\$41,841,202
2034	82,603,271	61,407,163	2.3479	144,177,877	0.90101	129,905,709
2035	134,086,555	99,679,768	2.4503	244,245,337	0.85526	208,893,267
2036	106,909,326	79,476,253	2.5571	203,228,726	0.81182	164,985,144
2037	61,196,063	45,493,073	2.6686	121,402,814	0.77060	93,553,008
2038	7,221,467	5,368,429	2.7850	14,951,074	0.73146	10,936,113
2039	13,874,102	10,313,989	2.9064	29,976,579	0.69432	20,813,338
2040	7,241,251	5,383,137	3.0331	16,327,592	0.65906	10,760,863
2041	20,526,738	15,259,550	3.1653	48,301,054	0.62559	30,216,656
2042	7,221,467	5,368,429	3.3033	17,733,531	0.59382	10,530,525
2043	20,526,738	15,259,550	3.4474	52,605,773	0.56366	29,651,770
2044	7,241,251	5,383,137	3.5977	19,366,911	0.53504	10,362,072
2045	20,526,738	15,259,550	3.7545	57,291,981	0.50787	29,096,878
2046	7,221,467	5,368,429	3.9182	21,034,578	0.48208	10,140,349
2047	20,526,738	15,259,550	4.0891	62,397,826	0.45760	28,553,245
2048	7,241,251	5,383,137	4.2674	22,971,998	0.43436	9,978,117
2049	32,955,490	24,499,068	4.4534	109,104,150	0.41230	44,983,641
2050	33,932,600	25,225,450	4.6476	117,237,801	0.39136	45,882,186
2051	22,447,263	16,687,266	4.8502	80,936,575	0.37149	30,067,128
2052	21,454,851	15,949,508	5.0617	80,731,624	0.35262	28,467,585
2053	12,301,776	9,145,124	5.2824	48,308,204	0.33471	16,169,239
2054	4,365,043	3,244,967	5.7506	12,170,574	0.31772	3,866,835
2055	4,028,704	2,994,933	5.8766	11,610,158	0.30158	3,501,391
2056	4,542,868	3,377,162	4.0069	13,531,950	0.28627	3,873,791
2057	4,028,704	2,994,933	4.1415	12,403,515	0.27173	3,370,407
2058	3,860,534	2,869,916	4.2807	12,285,250	0.25793	3,168,734
2059	4,196,873	3,119,950	4.4245	13,804,219	0.24483	3,379,687
2060	4,038,359	3,002,111	4.5731	13,728,953	0.23240	3,190,609
2061	4,196,873	3,119,950	4.7268	14,747,380	0.22060	3,253,272
2062	4,196,873	3,119,950	4.8856	15,242,828	0.20939	3,191,696
2063	4,196,873	3,119,950	5.0498	15,755,124	0.19876	3,131,488
2064	4,038,359	3,002,111	5.2195	15,669,517	0.18867	2,956,368
2065	4,196,873	3,119,950	5.3948	16,831,507	0.17909	3,014,355
2066	4,196,873	3,119,950	5.5761	17,397,154	0.16999	2,957,342
2067	4,028,704	2,994,933	5.7635	17,261,297	0.16136	2,785,283
2068	4,206,529	3,127,128	5.9571	18,628,613	0.15316	2,853,158
2069	4,196,873	3,119,950	6.1573	19,210,469	0.14539	2,793,010
2070	4,028,704	2,994,933	6.3641	19,060,054	0.13800	2,630,287
2071	4,196,873	3,119,950	6.5780	20,523,032	0.13099	2,688,312
2072	4,206,529	3,127,128	6.7990	21,261,342	0.12434	2,643,635
2073	4,028,704	2,994,933	7.0274	21,046,593	0.11803	2,484,129
2074	4,196,873	3,119,950	7.2636	22,662,069	0.11203	2,538,832
2075	5,424,388	4,032,483	7.5076	30,274,270	0.10634	3,219,366
2076	4,038,359	3,002,111	7.7599	23,296,080	0.10094	2,351,506
2077	15,078,966	11,209,683	8.0206	89,908,385	0.09582	8,615,021
2078	2,294,203	1,705,507	8.2901	14,138,827	0.09095	1,285,926
	\$787,621,437	\$585,516,740		\$2,058,860,726		\$1,085,532,479

Levelized (beginning of year payment, mid year interest)

AMOUNT TO RECOVER

	Cost Estimate Nominal \$s	Jurisdictional Cost in Nominal \$s	Escalation Factor	Jurisdictional Cost in Future \$'s	Discount Factor	Present Value to Decommission
	(1)	(2)	(3)	(4)	(5)	(6)
Prairie Island Unit 2			4.36%			
<i>Factors</i>	<i>2014</i>	<i>74.3399%</i>	<i>3.36%</i>		<i>5.23%</i>	<i>2034</i>
2034	\$13,063,811	\$9,711,620	2.3479	\$22,801,913	0.95030	\$21,668,658
2035	79,023,320	58,745,832	2.4503	143,944,912	0.90307	129,992,331
2036	122,429,706	91,014,083	2.5571	232,732,111	0.85819	199,728,370
2037	118,076,175	87,777,673	2.6686	234,243,499	0.81553	191,032,601
2038	99,702,549	74,118,743	2.7850	206,420,700	0.77500	159,976,043
2039	27,921,161	20,756,555	2.9064	60,326,850	0.73648	44,429,519
2040	15,806,355	11,750,424	3.0331	35,640,210	0.69988	24,943,870
2041	29,068,440	21,609,440	3.1653	68,400,360	0.66509	45,492,396
2042	15,763,168	11,718,319	3.3033	38,709,122	0.63204	24,465,713
2043	29,068,440	21,609,440	3.4474	74,496,383	0.60063	44,744,763
2044	15,806,355	11,750,424	3.5977	42,274,499	0.57077	24,129,016
2045	29,068,440	21,609,440	3.7545	81,132,642	0.54241	44,007,156
2046	15,763,168	11,718,319	3.9182	45,914,716	0.51545	23,666,740
2047	29,068,440	21,609,440	4.0891	88,363,161	0.48983	43,282,927
2048	15,806,355	11,750,424	4.2674	50,143,758	0.46549	23,341,418
2049	40,835,808	30,357,286	4.4534	135,193,138	0.44235	59,802,685
2050	39,134,575	29,092,591	4.6476	135,210,727	0.42037	56,838,533
2051	27,766,041	20,641,238	4.8502	100,114,134	0.39947	39,992,593
2052	26,488,635	19,691,616	5.0617	99,673,055	0.37962	37,837,885
2053	14,667,380	10,903,711	5.2824	57,597,761	0.36075	20,778,392
2054	4,365,043	3,244,967	3.7506	12,170,574	0.34282	4,172,316
2055	4,028,704	2,994,933	3.8766	11,610,158	0.32578	3,782,357
2056	4,542,868	3,377,162	4.0069	13,531,950	0.30959	4,189,356
2057	4,028,704	2,994,933	4.1415	12,403,515	0.29421	3,649,238
2058	3,860,534	2,869,916	4.2807	12,285,250	0.27958	3,434,710
2059	4,196,873	3,119,950	4.4245	13,804,219	0.26569	3,667,643
2060	4,038,359	3,002,111	4.5731	13,728,953	0.25248	3,466,286
2061	4,196,873	3,119,950	4.7268	14,747,380	0.23993	3,538,339
2062	4,196,873	3,119,950	4.8856	15,242,828	0.22801	3,475,517
2063	4,196,873	3,119,950	5.0498	15,755,124	0.21668	3,413,820
2064	4,038,359	3,002,111	5.2195	15,669,517	0.20591	3,226,510
2065	4,196,873	3,119,950	5.3948	16,831,507	0.19567	3,293,421
2066	4,196,873	3,119,950	5.5761	17,397,154	0.18595	3,235,001
2067	4,028,704	2,994,933	5.7635	17,261,297	0.17671	3,050,244
2068	4,206,529	3,127,128	5.9571	18,628,613	0.16792	3,128,117
2069	4,196,873	3,119,950	6.1573	19,210,469	0.15958	3,065,607
2070	4,028,704	2,994,933	6.3641	19,060,054	0.15165	2,890,457
2071	4,196,873	3,119,950	6.5780	20,523,032	0.14411	2,957,574
2072	4,206,529	3,127,128	6.7990	21,261,342	0.13695	2,911,741
2073	4,028,704	2,994,933	7.0274	21,046,593	0.13014	2,739,004
2074	4,196,873	3,119,950	7.2636	22,662,069	0.12367	2,802,618
2075	5,424,388	4,032,483	7.5076	30,274,270	0.11753	3,558,135
2076	4,038,359	3,002,111	7.7599	23,296,080	0.11169	2,601,939
2077	13,727,196	10,204,779	8.0206	81,848,452	0.10614	8,687,395
2078	2,113,441	1,571,129	8.2901	13,024,819	0.10086	1,313,683
	\$916,805,305	\$681,551,857		\$2,446,608,868		\$1,346,402,637
	\$3,012,342,202	\$2,239,371,229		\$8,330,149,203		\$3,900,111,500

Levelized (beginning of year payment, mid year interest)

EXTERNAL FUND CALCULATION

Monticello

	Beginning Balance	Assumed Interest	Annuity Transfer	Decommissioning Payment	Annuity	Ending Balance	Book Expense
2014	\$451,050,728	\$12,065,607	-	-	-	\$463,116,335	-
2015	463,116,335	25,130,807	-	-	13,236,764	501,483,907	13,236,764
2016	501,483,907	31,507,161	-	-	13,392,226	546,383,294	13,392,226
2017	546,383,294	34,290,923	-	-	13,392,226	594,066,443	13,392,226
2018	594,066,443	37,247,278	-	-	13,392,226	644,705,948	13,392,226
2019	644,705,948	40,386,928	-	-	13,392,226	698,485,102	13,392,226
2020	698,485,102	43,721,235	-	-	13,392,226	755,598,563	13,392,226
2021	755,598,563	47,262,270	-	-	13,392,226	816,253,059	13,392,226
2022	816,253,059	51,022,849	-	-	13,392,226	880,668,133	13,392,226
2023	880,668,133	55,016,583	-	-	13,392,226	949,076,943	13,392,226
2024	949,076,943	59,257,929	-	-	13,392,226	1,021,727,098	13,392,226
2025	1,021,727,098	63,762,239	-	-	13,392,226	1,098,881,563	13,392,226
2026	1,098,881,563	68,545,816	-	-	13,392,226	1,180,819,605	13,392,226
2027	1,180,819,605	73,625,975	-	-	13,392,226	1,267,837,806	13,392,226
2028	1,267,837,806	79,021,103	-	-	13,392,226	1,360,251,135	13,392,226
2029	1,360,251,135	84,750,729	-	-	13,392,226	1,458,394,090	13,392,226
2030	1,458,394,090	80,634,231	-	(\$44,355,360)	10,044,170	1,504,717,131	10,044,170
2031	1,504,717,131	82,909,914	-	(163,141,124)	-	1,424,485,921	-
2032	1,424,485,921	78,489,174	-	(248,602,420)	-	1,254,372,675	-
2033	1,254,372,675	69,115,934	-	(211,261,596)	-	1,112,227,013	-
2034	1,112,227,013	61,283,708	-	(159,116,359)	-	1,014,394,363	-
2035	1,014,394,363	55,893,129	-	(149,471,852)	-	920,815,640	-
2036	920,815,640	50,736,942	-	(37,310,403)	-	934,242,180	-
2037	934,242,180	51,476,744	-	(38,831,235)	-	946,887,689	-
2038	946,887,689	52,173,512	-	(40,524,991)	-	958,536,210	-
2039	958,536,210	52,815,345	-	(42,291,502)	-	969,060,053	-
2040	969,060,053	53,395,209	-	(44,255,673)	-	978,199,589	-
2041	978,199,589	53,898,797	-	(46,058,798)	-	986,039,588	-
2042	986,039,588	54,330,781	-	(48,066,859)	-	992,303,511	-
2043	992,303,511	54,675,923	-	(50,163,681)	-	996,815,753	-
2044	996,815,753	54,924,548	-	(52,493,698)	-	999,246,602	-
2045	999,246,602	55,058,488	-	(194,260,715)	-	860,044,376	-
2046	860,044,376	47,388,445	-	(175,726,718)	-	731,706,103	-
2047	731,706,103	40,317,006	-	(92,224,965)	-	679,798,145	-
2048	679,798,145	37,456,878	-	(86,547,654)	-	630,707,368	-
2049	630,707,368	34,751,976	-	(19,828,195)	-	645,631,149	-
2050	645,631,149	35,574,276	-	(50,719,751)	-	630,485,675	-
2051	630,485,675	34,739,761	-	(70,059,240)	-	595,166,196	-
2052	595,166,196	32,793,657	-	(43,383,041)	-	584,576,812	-
2053	584,576,812	32,210,182	-	(70,083,930)	-	546,703,065	-
2054	546,703,065	30,123,339	-	(92,607,536)	-	484,218,868	-
2055	484,218,868	26,680,460	-	(17,083,190)	-	493,816,137	-
2056	493,816,137	27,209,269	-	(17,705,766)	-	503,319,640	-
2057	503,319,640	27,732,912	-	(18,250,537)	-	512,802,015	-
2058	512,802,015	28,255,391	-	(18,863,956)	-	522,193,450	-
2059	522,193,450	28,772,859	-	(19,497,646)	-	531,468,662	-
2060	531,468,662	29,283,923	-	(20,207,701)	-	540,544,885	-
2061	540,544,885	29,784,023	-	(20,829,806)	-	549,499,102	-
2062	549,499,102	30,277,401	-	(21,529,597)	-	558,246,906	-
2063	558,246,906	30,759,405	-	(22,253,184)	-	566,753,126	-
2064	566,753,126	31,228,097	-	(23,064,026)	-	574,917,197	-
2065	574,917,197	31,677,938	-	(23,773,512)	-	582,821,623	-
2066	582,821,623	32,113,471	-	(24,572,455)	-	590,362,640	-
2067	590,362,640	32,528,981	-	(25,398,279)	-	597,493,342	-
2068	597,493,342	32,921,883	-	(26,323,347)	-	604,091,879	-
2069	604,091,879	33,285,463	-	(27,133,655)	-	610,243,686	-
2070	610,243,686	33,624,427	-	(28,044,970)	-	615,823,143	-
2071	615,823,143	33,931,855	-	(28,987,573)	-	620,767,425	-
2072	620,767,425	34,204,285	-	(30,043,550)	-	624,928,159	-
2073	624,928,159	34,433,542	-	(30,967,965)	-	628,393,736	-
2074	628,393,736	34,624,495	-	(32,008,838)	-	631,009,393	-
2075	631,009,393	34,768,618	-	(33,084,084)	-	632,693,926	-
2076	632,693,926	34,861,435	-	(34,289,593)	-	633,265,768	-
2077	633,265,768	34,892,944	-	(40,940,220)	-	627,218,492	-
2078	627,218,492	34,559,739	-	(50,611,580)	-	611,166,652	-
2079	611,166,652	33,675,283	-	(50,169,983)	-	594,671,951	-
2080	594,671,951	32,766,424	-	(51,967,381)	-	575,470,994	-
2081	575,470,994	31,708,452	-	(53,597,517)	-	553,581,929	-
2082	553,581,929	30,502,364	-	(57,764,271)	-	526,320,022	-
2083	526,320,022	29,000,233	-	(57,259,837)	-	498,060,418	-
2084	498,060,418	27,443,129	-	(59,311,325)	-	466,192,221	-
2085	466,192,221	25,687,191	-	(61,172,753)	-	430,706,660	-
2086	430,706,660	23,731,937	-	(65,927,961)	-	388,510,636	-
2087	388,510,636	21,406,936	-	(65,352,658)	-	344,564,914	-
2088	344,564,914	18,985,527	-	(88,749,263)	-	274,801,178	-
2089	274,801,178	15,141,545	-	(69,817,703)	-	220,125,020	-
2090	220,125,020	12,128,889	-	(150,897,790)	-	81,356,118	-
2091	81,356,118	4,482,722	-	(85,838,840)	-	(0)	-

External Levelized

Levelized (beginning of year payment, mid year interest)

EXTERNAL FUND CALCULATION

Prairie Island Unit 1

	Beginning Balance	Assumed Interest	Annuity Transfer	Decommissioning		Annuity	Ending Balance	Book Expense
				Payment				
2014	\$357,363,226	\$9,827,489	-	-	-	-	\$367,190,714	-
2015	367,190,714	20,195,489	-	-	-	-	387,386,204	-
2016	387,386,204	24,174,436	-	-	49,264	411,609,904	49,264	-
2017	411,609,904	25,685,995	-	-	49,264	437,345,164	49,264	-
2018	437,345,164	27,291,875	-	-	49,264	464,686,303	49,264	-
2019	464,686,303	28,997,962	-	-	49,264	493,733,530	49,264	-
2020	493,733,530	30,810,509	-	-	49,264	524,593,303	49,264	-
2021	524,593,303	32,736,159	-	-	49,264	557,378,727	49,264	-
2022	557,378,727	34,781,970	-	-	49,264	592,209,961	49,264	-
2023	592,209,961	36,955,439	-	-	49,264	629,214,663	49,264	-
2024	629,214,663	39,264,532	-	-	49,264	668,528,460	49,264	-
2025	668,528,460	41,717,713	-	-	49,264	710,295,437	49,264	-
2026	710,295,437	44,323,972	-	-	49,264	754,668,674	49,264	-
2027	754,668,674	47,092,862	-	-	49,264	801,810,800	49,264	-
2028	801,810,800	50,034,531	-	-	49,264	851,894,595	49,264	-
2029	851,894,595	53,159,760	-	-	49,264	905,103,620	49,264	-
2030	905,103,620	56,480,003	-	-	49,264	961,632,887	49,264	-
2031	961,632,887	60,007,429	-	-	49,264	1,021,689,580	49,264	-
2032	1,021,689,580	63,754,967	-	-	49,264	1,085,493,811	49,264	-
2033	1,085,493,811	58,074,973	-	(\$44,079,562)	39,411	1,099,528,634	39,411	-
2034	1,099,528,634	58,824,782	-	(144,177,877)	-	1,014,175,539	-	-
2035	1,014,175,539	54,258,391	-	(244,245,337)	-	824,188,593	-	-
2036	824,188,593	44,094,090	-	(203,228,726)	-	665,053,958	-	-
2037	665,053,958	35,580,387	-	(121,402,814)	-	579,231,530	-	-
2038	579,231,530	30,988,887	-	(14,951,074)	-	595,269,343	-	-
2039	595,269,343	31,846,910	-	(29,976,579)	-	597,139,674	-	-
2040	597,139,674	31,946,973	-	(16,327,592)	-	612,759,055	-	-
2041	612,759,055	32,782,609	-	(48,301,054)	-	597,240,610	-	-
2042	597,240,610	31,952,373	-	(17,733,531)	-	611,459,452	-	-
2043	611,459,452	32,713,081	-	(52,605,773)	-	591,566,760	-	-
2044	591,566,760	31,648,822	-	(19,366,911)	-	603,848,670	-	-
2045	603,848,670	32,305,904	-	(57,291,981)	-	578,862,593	-	-
2046	578,862,593	30,969,149	-	(21,034,578)	-	588,797,164	-	-
2047	588,797,164	31,500,648	-	(62,397,826)	-	557,899,986	-	-
2048	557,899,986	29,847,649	-	(22,971,998)	-	564,775,638	-	-
2049	564,775,638	30,215,497	-	(109,104,150)	-	485,886,984	-	-
2050	485,886,984	25,994,954	-	(117,237,801)	-	394,644,136	-	-
2051	394,644,136	21,113,461	-	(80,936,575)	-	334,821,022	-	-
2052	334,821,022	17,912,925	-	(80,731,624)	-	272,002,322	-	-
2053	272,002,322	14,552,124	-	(48,308,204)	-	238,246,243	-	-
2054	238,246,243	12,746,174	-	(12,170,574)	-	238,821,843	-	-
2055	238,821,843	12,776,969	-	(11,610,158)	-	239,988,654	-	-
2056	239,988,654	12,839,393	-	(13,531,950)	-	239,296,097	-	-
2057	239,296,097	12,802,341	-	(12,403,515)	-	239,694,923	-	-
2058	239,694,923	12,823,678	-	(12,285,250)	-	240,233,352	-	-
2059	240,233,352	12,852,484	-	(13,804,219)	-	239,281,617	-	-
2060	239,281,617	12,801,566	-	(13,728,953)	-	238,354,230	-	-
2061	238,354,230	12,751,951	-	(14,747,380)	-	236,358,801	-	-
2062	236,358,801	12,645,196	-	(15,242,828)	-	233,761,169	-	-
2063	233,761,169	12,506,223	-	(15,755,124)	-	230,512,268	-	-
2064	230,512,268	12,332,406	-	(15,669,517)	-	227,175,157	-	-
2065	227,175,157	12,153,871	-	(16,831,507)	-	222,497,521	-	-
2066	222,497,521	11,903,617	-	(17,397,154)	-	217,003,984	-	-
2067	217,003,984	11,609,713	-	(17,261,297)	-	211,352,401	-	-
2068	211,352,401	11,307,353	-	(18,628,613)	-	204,031,141	-	-
2069	204,031,141	10,915,666	-	(19,210,469)	-	195,736,338	-	-
2070	195,736,338	10,471,894	-	(19,060,054)	-	187,148,179	-	-
2071	187,148,179	10,012,428	-	(20,523,032)	-	176,637,575	-	-
2072	176,637,575	9,450,110	-	(21,261,342)	-	164,826,343	-	-
2073	164,826,343	8,818,209	-	(21,046,593)	-	152,597,959	-	-
2074	152,597,959	8,163,991	-	(22,662,069)	-	138,099,881	-	-
2075	138,099,881	7,388,344	-	(30,274,270)	-	115,213,954	-	-
2076	115,213,954	6,163,947	-	(23,296,080)	-	98,081,821	-	-
2077	98,081,821	5,247,377	-	(89,908,385)	-	13,420,813	-	-
2078	13,420,813	718,014	-	(14,138,827)	-	0	-	-

External Levelized

Levelized (beginning of year payment, mid year interest)

EXTERNAL FUND CALCULATION

Prairie Island Unit 2

	Beginning Balance	Assumed Interest	Annuity Transfer	Decommissioning		Annuity	Ending Balance	Book Expense
				Payment				
2014	\$406,406,407	\$11,237,137	-	-	-	-	\$417,643,544	
2015	417,643,544	23,122,021	-	-	952,368	441,717,933	952,368	
2016	441,717,933	27,846,794	-	-	589,341	470,154,068	589,341	
2017	470,154,068	29,638,271	-	-	589,341	500,381,679	589,341	
2018	500,381,679	31,542,610	-	-	589,341	532,513,630	589,341	
2019	532,513,630	33,566,923	-	-	589,341	566,669,894	589,341	
2020	566,669,894	35,718,768	-	-	589,341	602,978,002	589,341	
2021	602,978,002	38,006,178	-	-	589,341	641,573,522	589,341	
2022	641,573,522	40,437,696	-	-	589,341	682,600,559	589,341	
2023	682,600,559	43,022,399	-	-	589,341	726,212,299	589,341	
2024	726,212,299	45,769,939	-	-	589,341	772,571,579	589,341	
2025	772,571,579	48,690,574	-	-	589,341	821,851,493	589,341	
2026	821,851,493	51,795,208	-	-	589,341	874,236,043	589,341	
2027	874,236,043	55,095,435	-	-	589,341	929,920,818	589,341	
2028	929,920,818	58,603,576	-	-	589,341	989,113,735	589,341	
2029	989,113,735	62,332,730	-	-	589,341	1,052,035,806	589,341	
2030	1,052,035,806	66,296,820	-	-	589,341	1,118,921,966	589,341	
2031	1,118,921,966	70,510,648	-	-	589,341	1,190,021,955	589,341	
2032	1,190,021,955	74,989,947	-	-	589,341	1,265,601,244	589,341	
2033	1,265,601,244	79,751,443	-	-	589,341	1,345,942,027	589,341	
2034	1,345,942,027	70,405,097	-	(22,801,913)	471,473	1,394,016,684	471,473	
2035	1,394,016,684	72,907,073	-	(143,944,912)	-	1,322,978,845	-	
2036	1,322,978,845	69,191,794	-	(232,732,111)	-	1,159,438,528	-	
2037	1,159,438,528	60,638,635	-	(234,243,499)	-	985,833,664	-	
2038	985,833,664	51,559,101	-	(206,420,700)	-	830,972,064	-	
2039	830,972,064	43,459,839	-	(60,326,850)	-	814,105,053	-	
2040	814,105,053	42,577,694	-	(35,640,210)	-	821,042,538	-	
2041	821,042,538	42,940,525	-	(68,400,360)	-	795,582,702	-	
2042	795,582,702	41,608,975	-	(38,709,122)	-	798,482,556	-	
2043	798,482,556	41,760,638	-	(74,496,383)	-	765,746,810	-	
2044	765,746,810	40,048,558	-	(42,274,499)	-	763,520,869	-	
2045	763,520,869	39,932,141	-	(81,132,642)	-	722,320,369	-	
2046	722,320,369	37,777,355	-	(45,914,716)	-	714,183,008	-	
2047	714,183,008	37,351,771	-	(88,363,161)	-	663,171,619	-	
2048	663,171,619	34,683,876	-	(50,143,758)	-	647,711,737	-	
2049	647,711,737	33,875,324	-	(135,193,138)	-	546,393,922	-	
2050	546,393,922	28,576,402	-	(135,210,727)	-	439,759,597	-	
2051	439,759,597	22,999,427	-	(100,114,134)	-	362,644,890	-	
2052	362,644,890	18,966,328	-	(99,673,055)	-	281,938,163	-	
2053	281,938,163	14,745,366	-	(57,597,761)	-	239,085,768	-	
2054	239,085,768	12,504,186	-	(12,170,574)	-	239,419,380	-	
2055	239,419,380	12,521,634	-	(11,610,158)	-	240,330,856	-	
2056	240,330,856	12,569,304	-	(13,531,950)	-	239,368,209	-	
2057	239,368,209	12,518,957	-	(12,403,515)	-	239,483,651	-	
2058	239,483,651	12,524,995	-	(12,285,250)	-	239,723,397	-	
2059	239,723,397	12,537,534	-	(13,804,219)	-	238,456,711	-	
2060	238,456,711	12,471,286	-	(13,728,953)	-	237,199,044	-	
2061	237,199,044	12,405,510	-	(14,747,380)	-	234,857,174	-	
2062	234,857,174	12,283,030	-	(15,242,828)	-	231,897,376	-	
2063	231,897,376	12,128,233	-	(15,755,124)	-	228,270,485	-	
2064	228,270,485	11,938,546	-	(15,669,517)	-	224,539,514	-	
2065	224,539,514	11,743,417	-	(16,831,507)	-	219,451,424	-	
2066	219,451,424	11,477,309	-	(17,397,154)	-	213,531,579	-	
2067	213,531,579	11,167,702	-	(17,261,297)	-	207,437,984	-	
2068	207,437,984	10,849,007	-	(18,628,613)	-	199,658,377	-	
2069	199,658,377	10,442,133	-	(19,210,469)	-	190,890,042	-	
2070	190,890,042	9,983,549	-	(19,060,054)	-	181,813,537	-	
2071	181,813,537	9,508,848	-	(20,523,032)	-	170,799,354	-	
2072	170,799,354	8,932,806	-	(21,261,342)	-	158,470,818	-	
2073	158,470,818	8,288,024	-	(21,046,593)	-	145,712,249	-	
2074	145,712,249	7,620,751	-	(22,662,069)	-	130,670,930	-	
2075	130,670,930	6,834,090	-	(30,274,270)	-	107,230,750	-	
2076	107,230,750	5,608,168	-	(23,296,080)	-	89,542,838	-	
2077	89,542,838	4,683,090	-	(81,848,452)	-	12,377,477	-	
2078	12,377,477	647,342	-	(13,024,819)	-	(0)	-	

External Levelized

PRESENT TO PROPOSED ACCRUAL COMPARISON

	Present	Proposed	Difference
Monticello	\$13,236,764	\$21,776,206	\$8,539,442
Prairie Island Unit 1	0	6,769,034	6,769,034
Prairie Island Unit 2	952,368	6,996,324	6,043,956
TOTAL	\$14,189,132	\$35,541,564	\$21,352,432

Levelized (beginning of year payment, mid year interest)

ANNUAL ACCRUAL SUMMARY

	Remaining Life (yrs)	2014-2015 Operational Earnings Rate	2016+ Operational Earnings Rate	Post-Shutdown Earnings Rate	Present Value to Decommission	Market Value Balance 6/30/2014	Tax-Effect Adjustment	Tax-Adjusted Fund Balance 6/30/2014	2016-2018 Decommissioning Accrual
	(7)	(8)	(9)	(9)	(6)	(10)	(11)	(12)	(13)
Monticello	15.75	5.39%	6.24%	5.88%	\$1,666,748,691	\$470,990,497	\$19,939,768	\$451,050,728	\$21,776,206
Prairie Island Unit 1	18.80	5.51%	6.29%	5.82%	1,300,267,011	373,212,686	15,849,460	357,363,226	6,769,034
Prairie Island Unit 2	19.80	5.54%	6.34%	5.73%	1,571,662,254	423,527,119	17,120,712	406,406,407	6,996,324
TOTAL DECOMMISSIONING ACCRUAL					\$4,538,677,956	\$1,267,730,301	\$52,909,941	\$1,214,820,361	\$35,541,564

INPUT DATA

Escalation Rate (Operation/Radiological)	4.36%	(a)
Escalation Rate (ISFSI/Site Restoration)	3.36%	(a)
Jurisdictional Factor	74.3399%	(b)
IRS Tax Qualified Percent	100.00%	(c)
External Percent	100.00%	(d)

NOTES

Input Data

- (a) = Inflation rate from current filing documentation
(b) = 2014 Minnesota jurisdictional percent from 2013 electric rate case
(c) = IRS qualifying percent based upon 2005 Energy Policy Act
(d) = Recommended external funding

Amount to Recover

- (1) = Current cost estimate by year from TLG Cost Study, 2014.
(2) = Jurisdictional Nominal Cost = (1) x (b)
(3) = Escalation factor based upon the applicable escalation rate for future value calculation
(4) = Future Value of jurisdictional nominal cost
(5) = Discount factor based upon the applicable earnings rate for present value calculation
(6) = Present value to decommission at the start of 2015

Decommissioning Accrual

- (7) = Remaining life as of 1/1/15 based on E,G002/D-14-181
(8) = Fund earnings rate approved in 2011 Triennial Decommissioning Filing
(9) = Fund earnings rates proposed in 2014 Triennial Decommissioning Filing
(10) = Total Market Value Fund Balance as of June 30, 2014
(11) = Tax Effect Adjustment from Schedule G
(12) = (10) - (11)

Levelized (beginning of year payment, mid year interest)

AMOUNT TO RECOVER

	Cost Estimate Nominal \$s	Jurisdictional Cost in Nominal \$s	Escalation Factor	Jurisdictional Cost in Future \$'s	Discount Factor	Present Value to Decommission
	(1)	(2)	(3)	(4)	(5)	(6)
Monticello			4.36%			
<i>Factors</i>	2014	74.3399%	3.36%		5.88%	2030
2030	\$30,141,775	\$22,407,356	1.9795	\$44,354,300	0.94447	\$41,891,103
2031	106,231,518	78,972,371	2.0658	163,137,715	0.89201	145,521,281
2032	155,122,607	115,317,942	2.1558	248,605,167	0.84248	209,444,207
2033	126,314,980	93,902,390	2.2498	211,263,263	0.79569	168,100,208
2034	91,161,917	67,769,649	2.3479	159,117,023	0.75150	119,576,815
2035	82,057,516	61,001,449	2.4503	149,470,550	0.70977	106,089,411
2036	19,627,294	14,590,905	2.5571	37,310,560	0.67035	25,011,184
2037	19,573,836	14,551,164	2.6686	38,831,247	0.63312	24,584,981
2038	19,573,836	14,551,164	2.7850	40,524,290	0.59796	24,232,042
2039	19,573,836	14,551,164	2.9064	42,291,149	0.56476	23,884,170
2040	19,627,294	14,590,905	3.0331	44,255,582	0.53339	23,605,586
2041	19,573,836	14,551,164	3.1653	46,059,331	0.50377	23,203,336
2042	19,573,836	14,551,164	3.3033	48,067,518	0.47579	22,870,232
2043	19,573,836	14,551,164	3.4474	50,163,261	0.44937	22,541,910
2044	19,627,294	14,590,905	3.5977	52,493,356	0.42442	22,278,982
2045	69,600,296	51,740,768	3.7545	194,262,537	0.40085	77,869,276
2046	60,329,456	44,848,838	3.9182	175,728,196	0.37858	66,528,020
2047	30,429,360	22,621,146	4.0891	92,499,403	0.35756	33,074,108
2048	27,345,395	20,328,530	4.2674	86,748,980	0.33770	29,295,415
2049	8,000,509	5,947,568	4.4534	26,486,945	0.31895	8,447,987
2050	13,524,326	10,053,966	4.6476	46,726,576	0.30124	14,075,744
2051	13,524,326	10,053,966	4.8502	48,763,854	0.28451	13,873,675
2052	13,546,077	10,070,136	5.0617	50,971,804	0.26871	13,696,499
2053	13,524,326	10,053,966	5.2824	53,108,761	0.25378	13,478,196
2054	13,524,326	10,053,966	5.5127	55,424,303	0.23969	13,284,705
2055	13,524,326	10,053,966	5.7666	58,975,343	0.22638	12,823,232
2056	26,946,857	20,032,258	6.0069	80,266,613	0.21381	17,161,639
2057	13,524,326	10,053,966	6.2615	83,638,488	0.20193	16,408,235
2058	44,212,010	32,867,150	6.5187	109,692,866	0.19072	26,832,926
2059	13,524,326	10,053,966	6.7845	114,483,602	0.18013	8,012,757
2060	13,546,077	10,070,136	7.0631	120,052,198	0.17012	7,834,629
2061	13,524,326	10,053,966	7.3568	126,523,121	0.16068	7,635,880
2062	13,524,326	10,053,966	7.6686	133,919,897	0.15175	7,454,142
2063	44,212,010	32,867,150	8.0009	165,971,906	0.14333	23,788,161
2064	13,546,077	10,070,136	8.3595	174,560,606	0.13537	7,114,964
2065	13,524,326	10,053,966	8.7398	184,239,409	0.12785	6,934,472
2066	44,212,010	32,867,150	9.1461	195,270,297	0.12075	22,129,753
2067	13,524,326	10,053,966	9.5835	207,945,532	0.11404	6,608,312
2068	13,546,077	10,070,136	10.0851	222,988,826	0.10771	6,461,405
2069	13,524,326	10,053,966	10.7573	240,904,890	0.10173	6,297,492
2070	13,524,326	10,053,966	11.5941	261,984,894	0.09608	6,147,609
2071	13,524,326	10,053,966	12.6480	286,134,787	0.09074	6,001,292
2072	13,546,077	10,070,136	13.9690	315,466,853	0.08570	5,867,881
2073	13,524,326	10,053,966	15.5774	350,653,708	0.08094	5,719,024
2074	13,524,326	10,053,966	17.5636	395,027,672	0.07645	5,582,908
2075	13,524,326	10,053,966	19.9706	454,481,402	0.07220	5,450,032
2076	13,546,077	10,070,136	23.0599	534,143,052	0.06819	5,328,875
2077	13,524,326	10,053,966	27.0206	638,638,968	0.06441	5,193,692
2078	13,524,326	10,053,966	32.2901	783,348,437	0.06083	5,070,079
2079	13,524,326	10,053,966	39.5687	961,148,945	0.05745	4,949,409
2080	44,233,761	32,883,320	48.8566	1,192,233,078	0.05426	15,802,658
2081	13,524,326	10,053,966	59.1541	1,492,035,412	0.05125	4,716,615

Levelized (beginning of year payment, mid year interest)

AMOUNT TO RECOVER

	Cost Estimate Nominal \$s	Jurisdictional Cost in Nominal \$s	Escalation Factor	Jurisdictional Cost in Future \$'s	Discount Factor	Present Value to Decommission
	(1)	(2)	(3)	(4)	(5)	(6)
2082	13,524,326	10,053,966	9.4617	95,127,802	0.04840	4,604,357
2083	13,524,326	10,053,966	9.7796	98,324,096	0.04571	4,494,771
2084	13,546,077	10,070,136	10.1082	101,791,233	0.04318	4,394,850
2085	53,418,315	39,711,105	10.4479	414,896,262	0.04078	16,918,400
2086	13,524,326	10,053,966	10.7989	108,571,907	0.03851	4,181,415
2087	13,524,326	10,053,966	11.1618	112,219,923	0.03637	4,081,895
2088	16,001,107	11,895,202	11.5368	137,232,465	0.03435	4,714,491
2089	13,524,326	10,053,966	11.9244	119,887,794	0.03245	3,889,905
2090	13,524,326	10,053,966	12.3251	123,916,024	0.03064	3,797,323
2091	21,441,797	15,939,804	12.7392	203,060,534	0.02894	5,877,081
2092	13,546,077	10,070,136	13.1672	132,595,987	0.02734	3,624,538
2093	19,858,303	14,762,636	13.6097	200,914,589	0.02582	5,187,042
2094	24,608,786	18,294,139	14.0670	257,342,802	0.02438	6,274,894
2095	50,756,401	37,732,242	14.5396	548,611,824	0.02303	12,634,138
2096	7,960,884	5,918,111	15.0281	88,938,161	0.02175	1,934,437
2097	7,939,133	5,901,941	15.5331	91,675,318	0.02054	1,883,237
2098	7,939,133	5,901,941	16.0550	94,755,609	0.01940	1,838,415
2099	7,939,133	5,901,941	16.5944	97,939,398	0.01832	1,794,660
2100	7,939,133	5,901,941	17.1520	101,230,161	0.01731	1,751,946
2101	7,939,133	5,901,941	17.7283	104,631,495	0.01635	1,710,249
2102	7,939,133	5,901,941	18.3240	108,147,113	0.01544	1,669,544
2103	7,939,133	5,901,941	18.9397	111,780,856	0.01458	1,629,808
2104	7,960,884	5,918,111	19.5760	115,853,232	0.01377	1,595,377
2105	7,939,133	5,901,941	20.2338	119,418,726	0.01301	1,553,151
2106	7,939,133	5,901,941	20.9137	123,431,195	0.01228	1,516,185
2107	7,939,133	5,901,941	21.6164	127,578,483	0.01160	1,480,099
2108	7,960,884	5,918,111	22.3427	132,226,394	0.01096	1,448,830
2109	7,939,133	5,901,941	23.0934	136,295,788	0.01035	1,410,483
2110	7,939,133	5,901,941	23.8693	140,875,327	0.00977	1,376,913
2111	7,939,133	5,901,941	24.6713	145,608,738	0.00923	1,344,141
2112	7,960,884	5,918,111	25.5003	150,913,523	0.00872	1,315,745
2113	7,939,133	5,901,941	26.3571	155,558,031	0.00823	1,280,920
2114	7,939,133	5,901,941	27.2427	160,784,781	0.00778	1,250,434
2115	7,939,133	5,901,941	28.1580	166,187,150	0.00735	1,220,673
2116	7,960,884	5,918,111	29.1042	172,241,643	0.00694	1,194,885
2117	6,867,011	5,104,927	30.0821	153,566,709	0.00655	1,006,169
2118	8,212,367	6,105,063	31.0928	189,823,600	0.00619	1,174,655
2119	7,876,028	5,855,029	32.1375	188,166,195	0.00584	1,099,734
2120	7,892,999	5,867,645	33.2174	194,907,651	0.00552	1,075,873
2121	7,876,028	5,855,029	34.3335	201,023,395	0.00521	1,048,008
2122	8,212,367	6,105,063	35.4871	216,650,755	0.00492	1,066,754
2123	7,876,028	5,855,029	36.6794	214,759,115	0.00465	998,716
2124	7,892,999	5,867,645	37.9119	222,453,319	0.00439	977,047
2125	7,876,028	5,855,029	39.1857	229,433,382	0.00415	951,742
2126	8,212,367	6,105,063	40.5023	247,269,306	0.00392	968,766
2127	7,876,028	5,855,029	41.8632	245,110,326	0.00370	906,977
2128	10,348,029	7,692,711	43.2698	332,862,200	0.00349	1,163,282
2129	7,876,028	5,855,029	44.7237	261,858,460	0.00330	864,318
2130	16,469,129	12,243,129	46.2264	565,955,784	0.00312	1,764,312
2131	9,753,000	7,250,367	47.7796	346,419,706	0.00294	1,019,956
	\$2,124,433,988	\$1,579,301,431		\$13,571,420,741		\$1,666,748,691

Levelized (beginning of year payment, mid year interest)

AMOUNT TO RECOVER

	Cost Estimate Nominal \$s	Jurisdictional Cost in Nominal \$s	Escalation Factor	Jurisdictional Cost in Future \$'s	Discount Factor	Present Value to Decommission
	(1)	(2)	(3)	(4)	(5)	(6)
Prairie Island Unit 1			4.36%			
<i>Factors</i>	<i>2014</i>	<i>74.3399%</i>	<i>3.36%</i>		<i>5.82%</i>	<i>2033</i>
2033	\$26,355,519	\$19,592,658	2.2498	\$44,079,910	0.94500	\$41,655,557
2034	82,603,271	61,407,163	2.3479	144,178,479	0.89303	128,755,244
2035	134,086,555	99,679,768	2.4503	244,243,210	0.84391	206,119,570
2036	106,909,326	79,476,253	2.5571	203,229,585	0.79750	162,074,952
2037	61,196,063	45,493,073	2.6686	121,402,852	0.75364	91,493,471
2038	7,221,467	5,368,429	2.7850	14,950,816	0.71219	10,647,762
2039	13,874,102	10,313,989	2.9064	29,976,329	0.67302	20,174,563
2040	7,241,251	5,383,137	3.0331	16,327,558	0.63600	10,384,347
2041	20,526,738	15,259,550	3.1653	48,301,613	0.60102	29,030,319
2042	7,221,467	5,368,429	3.3033	17,733,774	0.56797	10,072,183
2043	20,526,738	15,259,550	3.4474	52,605,333	0.53673	28,234,782
2044	7,241,251	5,383,137	3.5977	19,366,785	0.50721	9,823,007
2045	20,526,738	15,259,550	3.7545	57,292,518	0.47931	27,461,046
2046	7,221,467	5,368,429	3.9182	21,034,755	0.45295	9,527,717
2047	20,526,738	15,259,550	4.0891	62,397,337	0.42804	26,708,512
2048	7,241,251	5,383,137	4.2674	22,971,736	0.40450	9,292,011
2049	33,866,524	25,176,330	4.4534	112,120,463	0.38225	42,858,109
2050	38,410,156	28,554,059	4.6476	132,707,171	0.36123	47,937,432
2051	29,910,708	22,235,581	4.8502	107,847,252	0.34136	36,814,736
2052	32,151,026	23,901,030	5.0617	120,979,364	0.32259	39,026,190
2053	25,636,749	19,058,325	5.2824	100,673,109	0.30484	30,689,554
2054	19,907,200	14,798,986	3.7506	55,504,984	0.28808	15,989,737
2055	19,907,200	14,798,986	3.8766	57,369,952	0.27223	15,618,023
2056	15,264,526	11,347,629	4.0069	45,468,450	0.25726	11,697,255
2057	11,530,247	8,571,570	4.1415	35,499,148	0.24311	8,630,262
2058	11,530,247	8,571,570	4.2807	36,691,919	0.22974	8,429,634
2059	4,084,067	3,036,090	4.4245	13,433,128	0.21711	2,916,404
2060	15,264,526	11,347,629	4.5731	51,894,359	0.20516	10,646,894
2061	11,530,247	8,571,570	4.7268	40,516,128	0.19388	7,855,304
2062	15,253,337	11,339,311	4.8856	55,399,607	0.18322	10,150,185
2063	15,253,337	11,339,311	5.0498	57,261,034	0.17314	9,914,224
2064	4,095,256	3,044,408	5.2195	15,890,146	0.16362	2,599,918
2065	11,530,247	8,571,570	5.3948	46,242,141	0.15462	7,149,933
2066	4,084,067	3,036,090	5.5761	16,929,521	0.14612	2,473,665
2067	15,253,337	11,339,311	5.7635	65,353,551	0.13808	9,023,971
2068	11,541,436	8,579,888	5.9571	51,111,271	0.13049	6,669,256
2069	4,084,067	3,036,090	6.1573	18,693,997	0.12331	2,305,129
2070	15,253,337	11,339,311	6.3641	72,165,012	0.11653	8,409,146
2071	11,530,247	8,571,570	6.5780	56,383,617	0.11012	6,208,839
2072	4,095,256	3,044,408	6.7990	20,698,930	0.10406	2,153,960
2073	11,530,247	8,571,570	7.0274	60,236,251	0.09834	5,923,520
2074	16,480,852	12,251,844	7.2636	88,992,106	0.09293	8,270,003
2075	4,084,067	3,036,090	7.5076	22,793,823	0.08782	2,001,721
2076	11,541,436	8,579,888	7.7599	66,578,911	0.08299	5,525,294

Levelized (beginning of year payment, mid year interest)

AMOUNT TO RECOVER

	Cost Estimate Nominal \$s	Jurisdictional Cost in Nominal \$s	Escalation Factor	Jurisdictional Cost in Future \$'s	Discount Factor	Present Value to Decommission
	(1)	(2)	(3)	(4)	(5)	(6)
2077	15,253,337	11,339,311	8.0206	90,948,218	0.07842	7,132,555
2078	4,084,067	3,036,090	8.2901	25,169,505	0.07411	1,865,339
2079	11,530,247	8,571,570	8.5687	73,446,811	0.07004	5,143,851
2080	11,541,436	8,579,888	8.8566	75,988,293	0.06618	5,029,147
2081	4,084,067	3,036,090	9.1541	27,792,792	0.06254	1,738,249
2082	7,807,157	5,803,830	9.4617	54,914,210	0.05910	3,245,614
2083	4,084,067	3,036,090	9.7796	29,691,845	0.05585	1,658,371
2084	4,095,256	3,044,408	10.1082	30,773,572	0.05278	1,624,256
2085	11,530,247	8,571,570	10.4479	89,554,610	0.04988	4,466,803
2086	26,422,607	19,642,531	10.7989	212,117,989	0.04713	9,998,126
2087	4,084,067	3,036,090	11.1618	33,888,097	0.04454	1,509,456
2088	18,987,616	14,115,369	11.5368	162,846,070	0.04209	6,854,612
2089	4,084,067	3,036,090	11.9244	36,203,636	0.03978	1,440,091
2090	11,530,247	8,571,570	12.3251	105,645,365	0.03759	3,971,189
2091	3,869,024	2,876,228	12.7392	36,640,871	0.03552	1,301,572
2092	19,107,402	14,204,418	13.1672	187,033,104	0.03357	6,278,459
2093	4,205,363	3,126,262	13.6097	42,547,384	0.03172	1,349,708
2094	19,265,893	14,322,240	14.0670	201,470,277	0.02998	6,039,626
2095	4,037,194	3,001,245	14.5396	43,636,905	0.02833	1,236,190
2096	19,443,741	14,454,452	15.0281	217,223,432	0.02677	5,815,274
2097	4,037,194	3,001,245	15.5331	46,618,569	0.02530	1,179,383
2098	18,761,384	13,947,188	16.0550	223,921,979	0.02391	5,353,339
2099	4,205,363	3,126,262	16.5944	51,878,555	0.02259	1,172,055
2100	26,232,857	19,501,472	17.1520	334,489,463	0.02135	7,141,262
2101	4,205,363	3,126,262	17.7283	55,423,362	0.02018	1,118,195
2102	4,205,363	3,126,262	18.3240	57,285,587	0.01907	1,092,200
2103	4,205,363	3,126,262	18.9397	59,210,383	0.01802	1,066,810
2104	5,274,387	3,920,973	19.5760	76,757,154	0.01703	1,306,894
2105	4,205,363	3,126,262	20.2338	63,256,167	0.01609	1,017,786
2106	4,205,363	3,126,262	20.9137	65,381,574	0.01520	994,126
2107	4,037,194	3,001,245	21.6164	64,875,982	0.01437	932,185
2108	4,215,042	3,133,457	22.3427	70,009,786	0.01358	950,625
2109	4,205,363	3,126,262	23.0934	72,195,956	0.01283	926,394
2110	4,037,194	3,001,245	23.8693	71,637,669	0.01213	868,673
2111	4,205,363	3,126,262	24.6713	77,129,031	0.01146	883,823
2112	4,215,042	3,133,457	25.5003	79,904,042	0.01083	865,263
2113	4,037,194	3,001,245	26.3571	79,104,092	0.01023	809,488
2114	4,205,363	3,126,262	27.2427	85,167,790	0.00967	823,606
2115	4,205,363	3,126,262	28.1580	88,029,428	0.00914	804,459
2116	4,046,872	3,008,440	29.1042	87,558,107	0.00864	756,144
2117	15,087,439	11,215,982	30.0821	337,399,842	0.00816	2,753,503
2118	2,294,203	1,705,507	31.0928	53,029,029	0.00771	408,965
	\$1,322,500,630	\$983,145,228		\$6,723,324,469		\$1,300,267,011

Levelized (beginning of year payment, mid year interest)

AMOUNT TO RECOVER

	Cost Estimate Nominal \$s	Jurisdictional Cost in Nominal \$s	Escalation Factor	Jurisdictional Cost in Future \$'s	Discount Factor	Present Value to Decommission
	(1)	(2)	(3)	(4)	(5)	(6)
Prairie Island Unit 2			4.36%			
<i>Factors</i>	<i>2014</i>	<i>74.3399%</i>	<i>3.36%</i>		<i>5.73%</i>	<i>2034</i>
2034	\$13,063,811	\$9,711,620	2.3479	\$22,802,008	0.94581	\$21,566,261
2035	79,023,320	58,745,832	2.4503	143,943,658	0.89455	128,764,478
2036	122,429,706	91,014,083	2.5571	232,733,095	0.84607	196,908,040
2037	118,076,175	87,777,673	2.6686	234,243,574	0.80022	187,445,387
2038	99,702,549	74,118,743	2.7850	206,417,131	0.75685	156,226,455
2039	27,921,161	20,756,555	2.9064	60,326,347	0.71583	43,183,479
2040	15,806,355	11,750,424	3.0331	35,640,136	0.67704	24,129,689
2041	29,068,440	21,609,440	3.1653	68,401,151	0.64035	43,800,347
2042	15,763,168	11,718,319	3.3033	38,709,653	0.60564	23,444,187
2043	29,068,440	21,609,440	3.4474	74,495,760	0.57282	42,672,612
2044	15,806,355	11,750,424	3.5977	42,274,223	0.54178	22,903,143
2045	29,068,440	21,609,440	3.7545	81,133,403	0.51241	41,573,913
2046	15,763,168	11,718,319	3.9182	45,915,102	0.48464	22,252,486
2047	29,068,440	21,609,440	4.0891	88,362,467	0.45838	40,503,503
2048	15,806,355	11,750,424	4.2674	50,143,185	0.43354	21,738,944
2049	41,746,842	31,034,548	4.4534	138,209,496	0.41004	56,671,691
2050	43,612,125	32,421,196	4.6476	150,679,986	0.38782	58,436,692
2051	35,229,480	26,189,549	4.8502	127,024,830	0.36680	46,592,975
2052	37,184,808	27,643,137	5.0617	139,920,711	0.34692	48,541,768
2053	28,002,351	20,816,911	5.2824	109,962,608	0.32812	36,081,151
2054	19,907,200	14,798,986	3.7506	55,504,984	0.31034	17,225,392
2055	19,907,200	14,798,986	3.8766	57,369,952	0.29352	16,839,274
2056	15,264,526	11,347,629	4.0069	45,468,450	0.27761	12,622,658
2057	11,530,247	8,571,570	4.1415	35,499,148	0.26257	9,320,954
2058	11,530,247	8,571,570	4.2807	36,691,919	0.24834	9,112,019
2059	4,084,067	3,036,090	4.4245	13,433,128	0.23488	3,155,173
2060	15,264,526	11,347,629	4.5731	51,894,359	0.22215	11,528,369
2061	11,530,247	8,571,570	4.7268	40,516,128	0.21011	8,512,898
2062	15,253,337	11,339,311	4.8856	55,399,607	0.19872	11,009,256
2063	15,253,337	11,339,311	5.0498	57,261,034	0.18795	10,762,477
2064	4,095,256	3,044,408	5.2195	15,890,146	0.17777	2,824,767
2065	11,530,247	8,571,570	5.3948	46,242,141	0.16813	7,774,894
2066	4,084,067	3,036,090	5.5761	16,929,521	0.15902	2,692,173
2067	15,253,337	11,339,311	5.7635	65,353,551	0.15040	9,829,452
2068	11,541,436	8,579,888	5.9571	51,111,271	0.14225	7,270,739
2069	4,084,067	3,036,090	6.1573	18,693,997	0.13454	2,515,161
2070	15,253,337	11,339,311	6.3641	72,165,012	0.12725	9,183,159
2071	11,530,247	8,571,570	6.5780	56,383,617	0.12036	6,786,098
2072	4,095,256	3,044,408	6.7990	20,698,930	0.11383	2,356,225
2073	11,530,247	8,571,570	7.0274	60,236,251	0.10766	6,485,279
2074	16,480,852	12,251,844	7.2636	88,992,106	0.10183	9,061,998
2075	4,084,067	3,036,090	7.5076	22,793,823	0.09631	2,195,288
2076	11,541,436	8,579,888	7.7599	66,578,911	0.09109	6,064,747
2077	15,253,337	11,339,311	8.0206	90,948,218	0.08615	7,835,595
2078	4,084,067	3,036,090	8.2901	25,169,505	0.08149	2,050,946

Levelized (beginning of year payment, mid year interest)

AMOUNT TO RECOVER

	Cost Estimate Nominal \$s	Jurisdictional Cost in Nominal \$s	Escalation Factor	Jurisdictional Cost in Future \$'s	Discount Factor	Present Value to Decommission
	(1)	(2)	(3)	(4)	(5)	(6)
2079	11,530,247	8,571,570	8.5687	73,446,811	0.07707	5,660,493
2080	11,541,436	8,579,888	8.8566	75,988,293	0.07289	5,538,980
2081	4,084,067	3,036,090	9.1541	27,792,792	0.06894	1,916,095
2082	7,807,157	5,803,830	9.4617	54,914,210	0.06521	3,580,728
2083	4,084,067	3,036,090	9.7796	29,691,845	0.06167	1,831,157
2084	4,095,256	3,044,408	10.1082	30,773,572	0.05833	1,795,015
2085	11,530,247	8,571,570	10.4479	89,554,610	0.05517	4,940,602
2086	26,422,607	19,642,531	10.7989	212,117,989	0.05218	11,068,052
2087	4,084,067	3,036,090	11.1618	33,888,097	0.04935	1,672,410
2088	18,987,616	14,115,369	11.5368	162,846,070	0.04668	7,601,066
2089	4,084,067	3,036,090	11.9244	36,203,636	0.04415	1,598,274
2090	11,530,247	8,571,570	12.3251	105,645,365	0.04175	4,411,144
2091	3,869,024	2,876,228	12.7392	36,640,871	0.03949	1,446,999
2092	19,107,402	14,204,418	13.1672	187,033,104	0.03735	6,985,907
2093	4,205,363	3,126,262	13.6097	42,547,384	0.03533	1,503,069
2094	19,265,893	14,322,240	14.0670	201,470,278	0.03341	6,731,608
2095	4,037,194	3,001,245	14.5396	43,636,905	0.03160	1,378,998
2096	19,443,741	14,454,452	15.0281	217,223,433	0.02989	6,492,591
2097	4,037,194	3,001,245	15.5331	46,618,570	0.02827	1,317,869
2098	18,761,384	13,947,188	16.0550	223,921,980	0.02674	5,987,033
2099	4,205,363	3,126,262	16.5944	51,878,555	0.02529	1,311,912
2100	26,232,857	19,501,472	17.1520	334,489,464	0.02392	8,000,201
2101	4,205,363	3,126,262	17.7283	55,423,363	0.02262	1,253,756
2102	4,205,363	3,126,262	18.3240	57,285,588	0.02140	1,225,652
2103	4,205,363	3,126,262	18.9397	59,210,384	0.02024	1,198,179
2104	5,274,387	3,920,973	19.5760	76,757,155	0.01914	1,469,076
2105	4,205,363	3,126,262	20.2338	63,256,167	0.01810	1,145,065
2106	4,205,363	3,126,262	20.9137	65,381,575	0.01712	1,119,398
2107	4,037,194	3,001,245	21.6164	64,875,983	0.01619	1,050,545
2108	4,215,042	3,133,457	22.3427	70,009,786	0.01532	1,072,238
2109	4,205,363	3,126,262	23.0934	72,195,957	0.01449	1,045,797
2110	4,037,194	3,001,245	23.8693	71,637,670	0.01370	981,471
2111	4,205,363	3,126,262	24.6713	77,129,032	0.01296	999,438
2112	4,215,042	3,133,457	25.5003	79,904,043	0.01226	979,283
2113	4,037,194	3,001,245	26.3571	79,104,093	0.01159	916,939
2114	4,205,363	3,126,262	27.2427	85,167,791	0.01096	933,724
2115	4,205,363	3,126,262	28.1580	88,029,428	0.01037	912,794
2116	4,046,872	3,008,440	29.1042	87,558,108	0.00981	858,703
2117	13,735,669	10,211,078	30.0821	307,170,259	0.00928	2,849,231
2118	2,113,441	1,571,129	31.0928	48,850,834	0.00877	428,570
	\$1,451,684,484	\$1,079,180,334		\$7,085,835,284		\$1,571,662,254
	\$4,898,619,102	\$3,641,626,993		\$27,380,580,494		\$4,538,677,956

Levelized (beginning of year payment, mid year interest)

EXTERNAL FUND CALCULATION

Monticello

levelized

	Beginning Balance	Assumed Interest	Annuity Transfer	Decommissioning Payment	Annuity	Ending Balance	Book Expense
2014	\$451,050,728	\$12,155,817	-	-	-	\$463,206,545	-
2015	463,206,545	25,323,564	-	-	13,236,764	501,766,873	13,236,764
2016	501,766,873	31,989,671	-	-	21,776,206	555,532,750	21,776,206
2017	555,532,750	35,344,661	-	-	21,776,206	612,653,617	21,776,206
2018	612,653,617	38,909,003	-	-	21,776,206	673,338,827	21,776,206
2019	673,338,827	42,695,760	-	-	21,776,206	737,810,794	21,776,206
2020	737,810,794	46,718,811	-	-	21,776,206	806,305,811	21,776,206
2021	806,305,811	50,992,900	-	-	21,776,206	879,074,918	21,776,206
2022	879,074,918	55,533,693	-	-	21,776,206	956,384,817	21,776,206
2023	956,384,817	60,357,830	-	-	21,776,206	1,038,518,853	21,776,206
2024	1,038,518,853	65,482,994	-	-	21,776,206	1,125,778,053	21,776,206
2025	1,125,778,053	70,927,968	-	-	21,776,206	1,218,482,228	21,776,206
2026	1,218,482,228	76,712,709	-	-	21,776,206	1,316,971,143	21,776,206
2027	1,316,971,143	82,858,417	-	-	21,776,206	1,421,605,766	21,776,206
2028	1,421,605,766	89,387,617	-	-	21,776,206	1,532,769,590	21,776,206
2029	1,532,769,590	96,324,240	-	-	21,776,206	1,650,870,036	21,776,206
2030	1,650,870,036	97,551,323	-	(\$44,354,300)	16,332,155	1,720,399,214	16,332,155
2031	1,720,399,214	101,159,474	-	(163,137,715)	-	1,658,420,973	-
2032	1,658,420,973	97,515,153	-	(248,605,167)	-	1,507,330,959	-
2033	1,507,330,959	88,631,060	-	(211,263,263)	-	1,384,698,757	-
2034	1,384,698,757	81,420,287	-	(159,117,023)	-	1,307,002,020	-
2035	1,307,002,020	76,851,719	-	(149,470,550)	-	1,234,383,189	-
2036	1,234,383,189	72,581,731	-	(37,310,560)	-	1,269,654,360	-
2037	1,269,654,360	74,655,676	-	(38,831,247)	-	1,305,478,788	-
2038	1,305,478,788	76,762,153	-	(40,524,290)	-	1,341,716,651	-
2039	1,341,716,651	78,892,939	-	(42,291,149)	-	1,378,318,442	-
2040	1,378,318,442	81,045,124	-	(44,255,582)	-	1,415,107,984	-
2041	1,415,107,984	83,208,349	-	(46,059,331)	-	1,452,257,003	-
2042	1,452,257,003	85,392,712	-	(48,067,518)	-	1,489,582,197	-
2043	1,489,582,197	87,587,433	-	(50,163,261)	-	1,527,006,369	-
2044	1,527,006,369	89,787,974	-	(52,493,356)	-	1,564,300,987	-
2045	1,564,300,987	91,980,898	-	(194,262,537)	-	1,462,019,348	-
2046	1,462,019,348	85,966,738	-	(175,728,196)	-	1,372,257,890	-
2047	1,372,257,890	80,688,764	-	(92,499,403)	-	1,360,447,251	-
2048	1,360,447,251	79,994,298	-	(86,748,980)	-	1,353,692,569	-
2049	1,353,692,569	79,597,123	-	(26,486,945)	-	1,406,802,747	-
2050	1,406,802,747	82,720,002	-	(46,726,576)	-	1,442,796,173	-
2051	1,442,796,173	84,836,415	-	(48,763,854)	-	1,478,868,734	-
2052	1,478,868,734	86,957,482	-	(50,971,804)	-	1,514,854,411	-
2053	1,514,854,411	89,073,439	-	(53,108,761)	-	1,550,819,090	-
2054	1,550,819,090	91,188,162	-	(55,424,303)	-	1,586,582,950	-
2055	1,586,582,950	93,291,077	-	(38,975,343)	-	1,640,898,684	-
2056	1,640,898,684	96,484,843	-	(80,266,613)	-	1,657,116,913	-
2057	1,657,116,913	97,438,474	-	(41,638,488)	-	1,712,916,900	-
2058	1,712,916,900	100,719,514	-	(140,692,866)	-	1,672,943,547	-
2059	1,672,943,547	98,369,081	-	(44,483,602)	-	1,726,829,026	-
2060	1,726,829,026	101,537,547	-	(46,052,198)	-	1,782,314,375	-
2061	1,782,314,375	104,800,085	-	(47,523,121)	-	1,839,591,339	-
2062	1,839,591,339	108,167,971	-	(49,119,897)	-	1,898,639,413	-
2063	1,898,639,413	111,639,997	-	(165,971,906)	-	1,844,307,504	-
2064	1,844,307,504	108,445,281	-	(52,560,606)	-	1,900,192,180	-
2065	1,900,192,180	111,731,300	-	(54,239,409)	-	1,957,684,070	-
2066	1,957,684,070	115,111,823	-	(183,270,297)	-	1,889,525,597	-
2067	1,889,525,597	111,104,105	-	(57,945,532)	-	1,942,684,170	-
2068	1,942,684,170	114,229,829	-	(59,988,826)	-	1,996,925,173	-
2069	1,996,925,173	117,419,200	-	(61,904,890)	-	2,052,439,483	-
2070	2,052,439,483	120,683,442	-	(63,984,894)	-	2,109,138,031	-

Levelized (beginning of year payment, mid year interest)

EXTERNAL FUND CALCULATION

External Lc	2071	2,109,138,031	124,017,316	-	(66,134,787)	-	2,167,020,561	-
	2072	2,167,020,561	127,420,809	-	(68,466,853)	-	2,225,974,516	-
	2073	2,225,974,516	130,887,302	-	(70,653,708)	-	2,286,208,110	-
	2074	2,286,208,110	134,429,037	-	(73,027,672)	-	2,347,609,475	-
	2075	2,347,609,475	138,039,437	-	(75,481,402)	-	2,410,167,510	-
	2076	2,410,167,510	141,717,850	-	(78,143,052)	-	2,473,742,307	-
	2077	2,473,742,307	145,456,048	-	(80,638,968)	-	2,538,559,387	-
	2078	2,538,559,387	149,267,292	-	(83,348,437)	-	2,604,478,241	-
	2079	2,604,478,241	153,143,321	-	(86,148,945)	-	2,671,472,617	-
	2080	2,671,472,617	157,082,590	-	(291,233,078)	-	2,537,322,129	-
	2081	2,537,322,129	149,194,541	-	(92,035,412)	-	2,594,481,258	-
	2082	2,594,481,258	152,555,498	-	(95,127,802)	-	2,651,908,954	-
	2083	2,651,908,954	155,932,246	-	(98,324,096)	-	2,709,517,104	-
	2084	2,709,517,104	159,319,606	-	(101,791,233)	-	2,767,045,476	-
	2085	2,767,045,476	162,702,274	-	(414,896,262)	-	2,514,851,488	-
	2086	2,514,851,488	147,873,267	-	(108,571,907)	-	2,554,152,848	-
	2087	2,554,152,848	150,184,187	-	(112,219,923)	-	2,592,117,113	-
	2088	2,592,117,113	152,416,486	-	(137,232,465)	-	2,607,301,134	-
	2089	2,607,301,134	153,309,307	-	(119,887,794)	-	2,640,722,647	-
	2090	2,640,722,647	155,274,492	-	(123,916,024)	-	2,672,081,115	-
	2091	2,672,081,115	157,118,370	-	(203,060,534)	-	2,626,138,951	-
	2092	2,626,138,951	154,416,970	-	(132,595,987)	-	2,647,959,934	-
	2093	2,647,959,934	155,700,044	-	(200,914,589)	-	2,602,745,390	-
	2094	2,602,745,390	153,041,429	-	(257,342,802)	-	2,498,444,017	-
	2095	2,498,444,017	146,908,508	-	(548,611,824)	-	2,096,740,701	-
	2096	2,096,740,701	123,288,353	-	(88,938,161)	-	2,131,090,893	-
	2097	2,131,090,893	125,308,145	-	(91,675,318)	-	2,164,723,719	-
	2098	2,164,723,719	127,285,755	-	(94,755,609)	-	2,197,253,865	-
	2099	2,197,253,865	129,198,527	-	(97,939,398)	-	2,228,512,994	-
	2100	2,228,512,994	131,036,564	-	(101,230,161)	-	2,258,319,397	-
	2101	2,258,319,397	132,789,181	-	(104,631,495)	-	2,286,477,083	-
	2102	2,286,477,083	134,444,852	-	(108,147,113)	-	2,312,774,822	-
	2103	2,312,774,822	135,991,160	-	(111,780,856)	-	2,336,985,126	-
	2104	2,336,985,126	137,414,725	-	(115,853,232)	-	2,358,546,619	-
	2105	2,358,546,619	138,682,541	-	(119,418,726)	-	2,377,810,435	-
	2106	2,377,810,435	139,815,254	-	(123,431,195)	-	2,394,194,494	-
	2107	2,394,194,494	140,778,636	-	(127,578,483)	-	2,407,394,647	-
	2108	2,407,394,647	141,554,805	-	(132,226,394)	-	2,416,723,058	-
	2109	2,416,723,058	142,103,316	-	(136,295,788)	-	2,422,530,585	-
	2110	2,422,530,585	142,444,798	-	(140,875,327)	-	2,424,100,057	-
	2111	2,424,100,057	142,537,083	-	(145,608,738)	-	2,421,028,403	-
	2112	2,421,028,403	142,356,470	-	(150,913,523)	-	2,412,471,350	-
	2113	2,412,471,350	141,853,315	-	(155,558,031)	-	2,398,766,634	-
	2114	2,398,766,634	141,047,478	-	(160,784,781)	-	2,379,029,331	-
	2115	2,379,029,331	139,886,925	-	(166,187,150)	-	2,352,729,106	-
	2116	2,352,729,106	138,340,471	-	(172,241,643)	-	2,318,827,934	-
	2117	2,318,827,934	136,347,083	-	(153,566,709)	-	2,301,608,308	-
	2118	2,301,608,308	135,334,569	-	(189,823,600)	-	2,247,119,277	-
	2119	2,247,119,277	132,130,614	-	(188,166,195)	-	2,191,083,696	-
	2120	2,191,083,696	128,835,721	-	(194,907,651)	-	2,125,011,766	-
	2121	2,125,011,766	124,950,692	-	(201,023,395)	-	2,048,939,062	-
	2122	2,048,939,062	120,477,617	-	(216,650,755)	-	1,952,765,924	-
	2123	1,952,765,924	114,822,636	-	(214,759,115)	-	1,852,829,445	-
	2124	1,852,829,445	108,946,371	-	(222,453,319)	-	1,739,322,498	-
	2125	1,739,322,498	102,272,163	-	(229,433,382)	-	1,612,161,278	-
	2126	1,612,161,278	94,795,083	-	(247,269,306)	-	1,459,687,055	-
	2127	1,459,687,055	85,829,599	-	(245,110,326)	-	1,300,406,328	-
	2128	1,300,406,328	76,463,892	-	(332,862,200)	-	1,044,008,020	-
	2129	1,044,008,020	61,387,672	-	(261,858,460)	-	843,537,232	-
	2130	843,537,232	49,599,989	-	(565,955,784)	-	327,181,437	-
	2131	327,181,437	19,238,269	-	(346,419,706)	-	(0)	-

Levelized (beginning of year payment, mid year interest)

EXTERNAL FUND CALCULATION

Prairie Island Unit 1

	Beginning Balance	Assumed Interest	Annuity Transfer	Decommissioning Payment	Annuity	Ending Balance	Book Expense
2014	\$357,363,226	\$9,845,357	-	-	-	\$367,208,583	-
2015	367,208,583	20,233,193	-	-	-	387,441,776	-
2016	387,441,776	24,582,974	-	-	6,769,034	418,793,784	6,769,034
2017	418,793,784	26,555,015	-	-	6,769,034	452,117,833	6,769,034
2018	452,117,833	28,651,098	-	-	6,769,034	487,537,965	6,769,034
2019	487,537,965	30,879,024	-	-	6,769,034	525,186,024	6,769,034
2020	525,186,024	33,247,087	-	-	6,769,034	565,202,145	6,769,034
2021	565,202,145	35,764,101	-	-	6,769,034	607,735,280	6,769,034
2022	607,735,280	38,439,435	-	-	6,769,034	652,943,750	6,769,034
2023	652,943,750	41,283,048	-	-	6,769,034	700,995,832	6,769,034
2024	700,995,832	44,305,524	-	-	6,769,034	752,070,390	6,769,034
2025	752,070,390	47,518,114	-	-	6,769,034	806,357,538	6,769,034
2026	806,357,538	50,932,775	-	-	6,769,034	864,059,348	6,769,034
2027	864,059,348	54,562,219	-	-	6,769,034	925,390,601	6,769,034
2028	925,390,601	58,419,955	-	-	6,769,034	990,579,590	6,769,034
2029	990,579,590	62,520,342	-	-	6,769,034	1,059,868,967	6,769,034
2030	1,059,868,967	66,878,644	-	-	6,769,034	1,133,516,645	6,769,034
2031	1,133,516,645	71,511,083	-	-	6,769,034	1,211,796,763	6,769,034
2032	1,211,796,763	76,434,903	-	-	6,769,034	1,295,000,700	6,769,034
2033	1,295,000,700	75,526,624	-	(\$44,079,910)	5,415,227	1,331,862,641	5,415,227
2034	1,331,862,641	77,514,406	-	(144,178,479)	-	1,265,198,568	-
2035	1,265,198,568	73,634,557	-	(244,243,210)	-	1,094,589,914	-
2036	1,094,589,914	63,705,133	-	(203,229,585)	-	955,065,462	-
2037	955,065,462	55,584,810	-	(121,402,852)	-	889,247,420	-
2038	889,247,420	51,754,200	-	(14,950,816)	-	926,050,804	-
2039	926,050,804	53,896,157	-	(29,976,329)	-	949,970,632	-
2040	949,970,632	55,288,291	-	(16,327,558)	-	988,931,364	-
2041	988,931,364	57,555,805	-	(48,301,613)	-	998,185,557	-
2042	998,185,557	58,094,399	-	(17,733,774)	-	1,038,546,182	-
2043	1,038,546,182	60,443,388	-	(52,605,333)	-	1,046,384,238	-
2044	1,046,384,238	60,899,563	-	(19,366,785)	-	1,087,917,015	-
2045	1,087,917,015	63,316,770	-	(57,292,518)	-	1,093,941,267	-
2046	1,093,941,267	63,667,382	-	(21,034,755)	-	1,136,573,894	-
2047	1,136,573,894	66,148,601	-	(62,397,337)	-	1,140,325,158	-
2048	1,140,325,158	66,366,924	-	(22,971,736)	-	1,183,720,347	-
2049	1,183,720,347	68,892,524	-	(112,120,463)	-	1,140,492,408	-
2050	1,140,492,408	66,376,658	-	(132,707,171)	-	1,074,161,896	-
2051	1,074,161,896	62,516,222	-	(107,847,252)	-	1,028,830,866	-
2052	1,028,830,866	59,877,956	-	(120,979,364)	-	967,729,459	-
2053	967,729,459	56,321,855	-	(100,673,109)	-	923,378,204	-
2054	923,378,204	53,740,611	-	(55,504,984)	-	921,613,831	-
2055	921,613,831	53,637,925	-	(57,369,952)	-	917,881,805	-
2056	917,881,805	53,420,721	-	(45,468,450)	-	925,834,076	-
2057	925,834,076	53,883,543	-	(35,499,148)	-	944,218,472	-
2058	944,218,472	54,953,515	-	(36,691,919)	-	962,480,068	-
2059	962,480,068	56,016,340	-	(13,433,128)	-	1,005,063,279	-
2060	1,005,063,279	58,494,683	-	(51,894,359)	-	1,011,663,603	-
2061	1,011,663,603	58,878,822	-	(40,516,128)	-	1,030,026,298	-
2062	1,030,026,298	59,947,531	-	(55,399,607)	-	1,034,574,221	-
2063	1,034,574,221	60,212,220	-	(57,261,034)	-	1,037,525,406	-
2064	1,037,525,406	60,383,979	-	(15,890,146)	-	1,082,019,239	-

Levelized

Levelized (beginning of year payment, mid year interest)

EXTERNAL FUND CALCULATION

External 1	2065	1,082,019,239	62,973,520	-	(46,242,141)	-	1,098,750,618	-
	2066	1,098,750,618	63,947,286	-	(16,929,521)	-	1,145,768,383	-
	2067	1,145,768,383	66,683,720	-	(65,353,551)	-	1,147,098,552	-
	2068	1,147,098,552	66,761,136	-	(51,111,271)	-	1,162,748,417	-
	2069	1,162,748,417	67,671,958	-	(18,693,997)	-	1,211,726,377	-
	2070	1,211,726,377	70,522,475	-	(72,165,012)	-	1,210,083,840	-
	2071	1,210,083,840	70,426,879	-	(56,383,617)	-	1,224,127,102	-
	2072	1,224,127,102	71,244,197	-	(20,698,930)	-	1,274,672,369	-
	2073	1,274,672,369	74,185,932	-	(60,236,251)	-	1,288,622,050	-
	2074	1,288,622,050	74,997,803	-	(88,992,106)	-	1,274,627,747	-
	2075	1,274,627,747	74,183,335	-	(22,793,823)	-	1,326,017,258	-
	2076	1,326,017,258	77,174,204	-	(66,578,911)	-	1,336,612,552	-
	2077	1,336,612,552	77,790,851	-	(90,948,218)	-	1,323,455,185	-
	2078	1,323,455,185	77,025,092	-	(25,169,505)	-	1,375,310,771	-
	2079	1,375,310,771	80,043,087	-	(73,446,811)	-	1,381,907,047	-
	2080	1,381,907,047	80,426,990	-	(75,988,293)	-	1,386,345,745	-
	2081	1,386,345,745	80,685,322	-	(27,792,792)	-	1,439,238,275	-
	2082	1,439,238,275	83,763,668	-	(54,914,210)	-	1,468,087,732	-
	2083	1,468,087,732	85,442,706	-	(29,691,845)	-	1,523,838,593	-
	2084	1,523,838,593	88,687,406	-	(30,773,572)	-	1,581,752,427	-
	2085	1,581,752,427	92,057,991	-	(89,554,610)	-	1,584,255,809	-
	2086	1,584,255,809	92,203,688	-	(212,117,989)	-	1,464,341,508	-
	2087	1,464,341,508	85,224,676	-	(33,888,097)	-	1,515,678,086	-
	2088	1,515,678,086	88,212,465	-	(162,846,070)	-	1,441,044,480	-
	2089	1,441,044,480	83,868,789	-	(36,203,636)	-	1,488,709,633	-
	2090	1,488,709,633	86,642,901	-	(105,645,365)	-	1,469,707,169	-
	2091	1,469,707,169	85,536,957	-	(36,640,871)	-	1,518,603,255	-
	2092	1,518,603,255	88,382,709	-	(187,033,104)	-	1,419,952,861	-
	2093	1,419,952,861	82,641,256	-	(42,547,384)	-	1,460,046,733	-
	2094	1,460,046,733	84,974,720	-	(201,470,277)	-	1,343,551,176	-
	2095	1,343,551,176	78,194,678	-	(43,636,905)	-	1,378,108,949	-
	2096	1,378,108,949	80,205,941	-	(217,223,432)	-	1,241,091,458	-
	2097	1,241,091,458	72,231,523	-	(46,618,569)	-	1,266,704,411	-
	2098	1,266,704,411	73,722,197	-	(223,921,979)	-	1,116,504,629	-
	2099	1,116,504,629	64,980,569	-	(51,878,555)	-	1,129,606,644	-
	2100	1,129,606,644	65,743,107	-	(334,489,463)	-	860,860,287	-
	2101	860,860,287	50,102,069	-	(55,423,362)	-	855,538,994	-
	2102	855,538,994	49,792,369	-	(57,285,587)	-	848,045,776	-
	2103	848,045,776	49,356,264	-	(59,210,383)	-	838,191,657	-
	2104	838,191,657	48,782,754	-	(76,757,154)	-	810,217,258	-
	2105	810,217,258	47,154,644	-	(63,256,167)	-	794,115,735	-
	2106	794,115,735	46,217,536	-	(65,381,574)	-	774,951,697	-
	2107	774,951,697	45,102,189	-	(64,875,982)	-	755,177,903	-
	2108	755,177,903	43,951,354	-	(70,009,786)	-	729,119,472	-
	2109	729,119,472	42,434,753	-	(72,195,956)	-	699,358,268	-
	2110	699,358,268	40,702,651	-	(71,637,669)	-	668,423,250	-
	2111	668,423,250	38,902,233	-	(77,129,031)	-	630,196,453	-
	2112	630,196,453	36,677,434	-	(79,904,042)	-	586,969,844	-
	2113	586,969,844	34,161,645	-	(79,104,092)	-	542,027,397	-
	2114	542,027,397	31,545,994	-	(85,167,790)	-	488,405,601	-
	2115	488,405,601	28,425,206	-	(88,029,428)	-	428,801,380	-
	2116	428,801,380	24,956,240	-	(87,558,107)	-	366,199,513	-
	2117	366,199,513	21,312,812	-	(337,399,842)	-	50,112,482	-
	2118	50,112,482	2,916,546	-	(53,029,029)	-	(0)	-

Levelized (beginning of year payment, mid year interest)

EXTERNAL FUND CALCULATION

Prairie Island Unit 2

	Beginning Balance	Assumed Interest	Annuity Transfer	Decommissioning Payment	Annuity	Ending Balance	Book Expense
2014	\$406,406,407	\$11,257,457	-	-	-	\$417,663,864	
2015	417,663,864	23,164,959	-	-	952,368	441,781,191	952,368
2016	441,781,191	28,230,711	-	-	6,996,324	477,008,225	6,996,324
2017	477,008,225	30,464,105	-	-	6,996,324	514,468,654	6,996,324
2018	514,468,654	32,839,096	-	-	6,996,324	554,304,074	6,996,324
2019	554,304,074	35,364,662	-	-	6,996,324	596,665,059	6,996,324
2020	596,665,059	38,050,348	-	-	6,996,324	641,711,731	6,996,324
2021	641,711,731	40,906,307	-	-	6,996,324	689,614,361	6,996,324
2022	689,614,361	43,943,334	-	-	6,996,324	740,554,019	6,996,324
2023	740,554,019	47,172,908	-	-	6,996,324	794,723,251	6,996,324
2024	794,723,251	50,607,238	-	-	6,996,324	852,326,812	6,996,324
2025	852,326,812	54,259,303	-	-	6,996,324	913,582,439	6,996,324
2026	913,582,439	58,142,910	-	-	6,996,324	978,721,673	6,996,324
2027	978,721,673	62,272,737	-	-	6,996,324	1,047,990,734	6,996,324
2028	1,047,990,734	66,664,396	-	-	6,996,324	1,121,651,453	6,996,324
2029	1,121,651,453	71,334,486	-	-	6,996,324	1,199,982,262	6,996,324
2030	1,199,982,262	76,300,659	-	-	6,996,324	1,283,279,245	6,996,324
2031	1,283,279,245	81,581,688	-	-	6,996,324	1,371,857,256	6,996,324
2032	1,371,857,256	87,197,533	-	-	6,996,324	1,466,051,113	6,996,324
2033	1,466,051,113	93,169,424	-	-	6,996,324	1,566,216,861	6,996,324
2034	1,566,216,861	89,904,582	-	(22,802,008)	5,597,059	1,638,916,494	5,597,059
2035	1,638,916,494	93,909,915	-	(143,943,658)	-	1,588,882,750	-
2036	1,588,882,750	91,042,982	-	(232,733,095)	-	1,447,192,637	-
2037	1,447,192,637	82,924,138	-	(234,243,574)	-	1,295,873,201	-
2038	1,295,873,201	74,253,534	-	(206,417,131)	-	1,163,709,604	-
2039	1,163,709,604	66,680,560	-	(60,326,347)	-	1,170,063,818	-
2040	1,170,063,818	67,044,657	-	(35,640,136)	-	1,201,468,338	-
2041	1,201,468,338	68,844,136	-	(68,401,151)	-	1,201,911,323	-
2042	1,201,911,323	68,869,519	-	(38,709,653)	-	1,232,071,189	-
2043	1,232,071,189	70,597,679	-	(74,495,760)	-	1,228,173,109	-
2044	1,228,173,109	70,374,319	-	(42,274,223)	-	1,256,273,204	-
2045	1,256,273,204	71,984,455	-	(81,133,403)	-	1,247,124,256	-
2046	1,247,124,256	71,460,220	-	(45,915,102)	-	1,272,669,373	-
2047	1,272,669,373	72,923,955	-	(88,362,467)	-	1,257,230,861	-
2048	1,257,230,861	72,039,328	-	(50,143,185)	-	1,279,127,004	-
2049	1,279,127,004	73,293,977	-	(138,209,496)	-	1,214,211,485	-
2050	1,214,211,485	69,574,318	-	(150,679,986)	-	1,133,105,817	-
2051	1,133,105,817	64,926,963	-	(127,024,830)	-	1,071,007,950	-
2052	1,071,007,950	61,368,756	-	(139,920,711)	-	992,455,995	-
2053	992,455,995	56,867,729	-	(109,962,608)	-	939,361,116	-
2054	939,361,116	53,825,392	-	(55,504,984)	-	937,681,523	-
2055	937,681,523	53,729,151	-	(57,369,952)	-	934,040,723	-
2056	934,040,723	53,520,533	-	(45,468,450)	-	942,092,806	-
2057	942,092,806	53,981,918	-	(35,499,148)	-	960,575,577	-
2058	960,575,577	55,040,981	-	(36,691,919)	-	978,924,638	-
2059	978,924,638	56,092,382	-	(13,433,128)	-	1,021,583,891	-
2060	1,021,583,891	58,536,757	-	(51,894,359)	-	1,028,226,290	-
2061	1,028,226,290	58,917,366	-	(40,516,128)	-	1,046,627,529	-
2062	1,046,627,529	59,971,757	-	(55,399,607)	-	1,051,199,679	-
2063	1,051,199,679	60,233,742	-	(57,261,034)	-	1,054,172,386	-

levelized

Levelized (beginning of year payment, mid year interest)

EXTERNAL FUND CALCULATION

External Lev	2064	1,054,172,386	60,404,078	-	(15,890,146)	-	1,098,686,318	-
	2065	1,098,686,318	62,954,726	-	(46,242,141)	-	1,115,398,903	-
	2066	1,115,398,903	63,912,357	-	(16,929,521)	-	1,162,381,739	-
	2067	1,162,381,739	66,604,474	-	(65,353,551)	-	1,163,632,662	-
	2068	1,163,632,662	66,676,152	-	(51,111,271)	-	1,179,197,543	-
	2069	1,179,197,543	67,568,019	-	(18,693,997)	-	1,228,071,565	-
	2070	1,228,071,565	70,368,501	-	(72,165,012)	-	1,226,275,053	-
	2071	1,226,275,053	70,265,561	-	(56,383,617)	-	1,240,156,996	-
	2072	1,240,156,996	71,060,996	-	(20,698,930)	-	1,290,519,062	-
	2073	1,290,519,062	73,946,742	-	(60,236,251)	-	1,304,229,552	-
	2074	1,304,229,552	74,732,353	-	(88,992,106)	-	1,289,969,800	-
	2075	1,289,969,800	73,915,270	-	(22,793,823)	-	1,341,091,246	-
	2076	1,341,091,246	76,844,528	-	(66,578,911)	-	1,351,356,864	-
	2077	1,351,356,864	77,432,748	-	(90,948,218)	-	1,337,841,394	-
	2078	1,337,841,394	76,658,312	-	(25,169,505)	-	1,389,330,200	-
	2079	1,389,330,200	79,608,620	-	(73,446,811)	-	1,395,492,010	-
	2080	1,395,492,010	79,961,692	-	(75,988,293)	-	1,399,465,410	-
	2081	1,399,465,410	80,189,368	-	(27,792,792)	-	1,451,861,985	-
	2082	1,451,861,985	83,191,692	-	(54,914,210)	-	1,480,139,467	-
	2083	1,480,139,467	84,811,991	-	(29,691,845)	-	1,535,259,613	-
	2084	1,535,259,613	87,970,376	-	(30,773,572)	-	1,592,456,417	-
	2085	1,592,456,417	91,247,753	-	(89,554,610)	-	1,594,149,560	-
	2086	1,594,149,560	91,344,770	-	(212,117,989)	-	1,473,376,341	-
	2087	1,473,376,341	84,424,464	-	(33,888,097)	-	1,523,912,708	-
	2088	1,523,912,708	87,320,198	-	(162,846,070)	-	1,448,386,835	-
	2089	1,448,386,835	82,992,566	-	(36,203,636)	-	1,495,175,765	-
	2090	1,495,175,765	85,673,571	-	(105,645,365)	-	1,475,203,972	-
	2091	1,475,203,972	84,529,188	-	(36,640,871)	-	1,523,092,288	-
	2092	1,523,092,288	87,273,188	-	(187,033,104)	-	1,423,332,372	-
	2093	1,423,332,372	81,556,945	-	(42,547,384)	-	1,462,341,932	-
	2094	1,462,341,932	83,792,193	-	(201,470,278)	-	1,344,663,847	-
	2095	1,344,663,847	77,049,238	-	(43,636,905)	-	1,378,076,180	-
	2096	1,378,076,180	78,963,765	-	(217,223,433)	-	1,239,816,513	-
	2097	1,239,816,513	71,041,486	-	(46,618,570)	-	1,264,239,429	-
	2098	1,264,239,429	72,440,919	-	(223,921,980)	-	1,112,758,369	-
	2099	1,112,758,369	63,761,055	-	(51,878,555)	-	1,124,640,869	-
	2100	1,124,640,869	64,441,922	-	(334,489,464)	-	854,593,327	-
	2101	854,593,327	48,968,198	-	(55,423,363)	-	848,138,162	-
	2102	848,138,162	48,598,317	-	(57,285,588)	-	839,450,891	-
	2103	839,450,891	48,100,536	-	(59,210,384)	-	828,341,043	-
	2104	828,341,043	47,463,942	-	(76,757,155)	-	799,047,830	-
	2105	799,047,830	45,785,441	-	(63,256,167)	-	781,577,103	-
	2106	781,577,103	44,784,368	-	(65,381,575)	-	760,979,897	-
	2107	760,979,897	43,604,148	-	(64,875,983)	-	739,708,062	-
	2108	739,708,062	42,385,272	-	(70,009,786)	-	712,083,548	-
	2109	712,083,548	40,802,387	-	(72,195,957)	-	680,689,978	-
	2110	680,689,978	39,003,536	-	(71,637,670)	-	648,055,844	-
	2111	648,055,844	37,133,600	-	(77,129,032)	-	608,060,412	-
	2112	608,060,412	34,841,862	-	(79,904,043)	-	562,998,230	-
	2113	562,998,230	32,259,799	-	(79,104,093)	-	516,153,936	-
	2114	516,153,936	29,575,621	-	(85,167,791)	-	460,561,766	-
	2115	460,561,766	26,390,189	-	(88,029,428)	-	398,922,527	-
	2116	398,922,527	22,858,261	-	(87,558,108)	-	334,222,680	-
	2117	334,222,680	19,150,960	-	(307,170,259)	-	46,203,380	-
	2118	46,203,380	2,647,454	-	(48,850,834)	-	(0)	-

PRESENT TO PROPOSED ACCRUAL COMPARISON

	Present	Proposed	Difference
Monticello	\$13,236,764	\$25,458,231	\$12,221,466
Prairie Island Unit 1	0	8,365,322	8,365,322
Prairie Island Unit 2	952,368	8,492,272	7,539,904
TOTAL	\$14,189,132	\$42,315,825	\$28,126,693

Levelized (beginning of year payment, mid year interest)

ANNUAL ACCRUAL SUMMARY									
	Remaining Life (yrs)	2014-2015 Operational Earnings Rate	2016+ Operational Earnings Rate	Post-Shutdown Earnings Rate	Present Value to Decommission	Market Value Balance 6/30/2014	Tax-Effect Adjustment	Tax-Adjusted Fund Balance 6/30/2014	2016-2018 Decommissioning Accrual
	(7)	(8)	(9)	(9)	(6)	(10)	(11)	(12)	(13)
Monticello	15.75	5.40%	6.25%	6.04%	\$1,752,699,979	\$470,990,497	\$19,939,768	\$451,050,728	\$25,458,231
Prairie Island Unit 1	18.80	5.51%	6.30%	6.01%	1,351,148,188	373,212,686	15,849,460	357,363,226	8,365,322
Prairie Island Unit 2	19.80	5.54%	6.35%	5.94%	1,624,626,930	423,527,119	17,120,712	406,406,407	8,492,272
TOTAL DECOMMISSIONING ACCRUAL					\$4,728,475,097	\$1,267,730,301	\$52,909,941	\$1,214,820,361	\$42,315,825

INPUT DATA

Escalation Rate (Operation/Radiological)	4.36%	(a)
Escalation Rate (ISFSI/Site Restoration)	3.36%	(a)
Jurisdictional Factor	74.3399%	(b)
IRS Tax Qualified Percent	100.00%	(c)
External Percent	100.00%	(d)

NOTES

Input Data

- (a) = Inflation rate from current filing documentation
(b) = 2014 Minnesota jurisdictional percent from 2013 electric rate case
(c) = IRS qualifying percent based upon 2005 Energy Policy Act
(d) = Recommended external funding

Amount to Recover

- (1) = Current cost estimate by year from TLG Cost Study, 2014.
(2) = Jurisdictional Nominal Cost = (1) x (b)
(3) = Escalation factor based upon the applicable escalation rate for future value calculation
(4) = Future Value of jurisdictional nominal cost
(5) = Discount factor based upon the applicable earnings rate for present value calculation
(6) = Present value to decommission at the start of 2015

Decommissioning Accrual

- (7) = Remaining life as of 1/1/15 based on E,G002/D-14-181
(8) = Fund earnings rate approved in 2011 Triennial Decommissioning Filing
(9) = Fund earnings rates proposed in 2014 Triennial Decommissioning Filing
(10) = Total Market Value Fund Balance as of June 30, 2014
(11) = Tax Effect Adjustment from Schedule G
(12) = (10) - (11)

Levelized (beginning of year payment, mid year interest)

AMOUNT TO RECOVER

	Cost Estimate Nominal \$s	Jurisdictional Cost in Nominal \$s	Escalation Factor	Jurisdictional Cost in Future \$'s	Discount Factor	Present Value to Decommission
	(1)	(2)	(3)	(4)	(5)	(6)
Monticello			4.36%			
<i>Factors</i>	<i>2014</i>	<i>74.3399%</i>	<i>3.36%</i>		<i>6.04%</i>	<i>2030</i>
2030	\$30,141,775	\$22,407,356	1.9795	\$44,354,300	0.94304	\$41,827,895
2031	106,231,518	78,972,371	2.0658	163,137,715	0.88933	145,082,468
2032	155,122,607	115,317,942	2.1558	248,605,167	0.83867	208,497,568
2033	126,314,980	93,902,390	2.2498	211,263,263	0.79090	167,087,941
2034	91,161,917	67,769,649	2.3479	159,117,023	0.74585	118,677,408
2035	82,057,516	61,001,449	2.4503	149,470,550	0.70337	105,132,579
2036	19,627,294	14,590,905	2.5571	37,310,560	0.66330	24,748,207
2037	19,573,836	14,551,164	2.6686	38,831,247	0.62552	24,289,780
2038	19,573,836	14,551,164	2.7850	40,524,290	0.58989	23,904,956
2039	19,573,836	14,551,164	2.9064	42,291,149	0.55629	23,526,228
2040	19,627,294	14,590,905	3.0331	44,255,582	0.52461	23,216,735
2041	19,573,836	14,551,164	3.1653	46,059,331	0.49472	22,786,677
2042	19,573,836	14,551,164	3.3033	48,067,518	0.46655	22,425,666
2043	19,573,836	14,551,164	3.4474	50,163,261	0.43997	22,070,374
2044	19,627,294	14,590,905	3.5977	52,493,356	0.41491	21,780,034
2045	69,600,296	51,740,768	3.7545	194,262,537	0.39128	76,010,493
2046	60,329,456	44,848,838	3.9182	175,728,196	0.36899	64,841,974
2047	30,429,360	22,621,146	4.0891	92,499,403	0.34797	32,187,259
2048	27,430,692	20,391,941	4.2674	87,019,573	0.32815	28,555,666
2049	9,112,424	6,774,164	4.4534	30,168,114	0.30946	9,335,848
2050	14,636,241	10,880,562	4.6476	50,568,244	0.29183	14,757,533
2051	14,636,241	10,880,562	4.8502	52,773,020	0.27521	14,523,729
2052	14,661,038	10,898,997	5.0617	55,167,232	0.25954	14,317,845
2053	14,636,241	10,880,562	5.2824	57,475,146	0.24475	14,067,173
2054	14,636,241	10,880,562	5.5127	59,981,063	0.23081	13,844,306
2055	14,636,241	10,880,562	3.8766	42,179,737	0.21766	9,181,025
2056	28,061,819	20,861,119	4.0069	83,587,749	0.20527	17,157,745
2057	14,636,241	10,880,562	4.1415	45,061,834	0.19357	8,722,816
2058	45,321,934	33,692,266	4.2807	144,224,902	0.18255	26,328,032
2059	14,636,241	10,880,562	4.4245	48,140,863	0.17215	8,287,476
2060	14,661,038	10,898,997	4.5731	49,842,699	0.16234	8,091,709
2061	14,636,241	10,880,562	4.7268	51,430,278	0.15310	7,873,863
2062	14,636,241	10,880,562	4.8856	53,158,335	0.14438	7,674,863
2063	45,321,934	33,692,266	5.0498	170,138,562	0.13615	23,165,000
2064	14,661,038	10,898,997	5.2195	56,886,806	0.12840	7,304,179
2065	14,636,241	10,880,562	5.3948	58,698,753	0.12108	7,107,535
2066	45,321,934	33,692,266	5.5761	187,871,222	0.11419	21,452,636
2067	14,636,241	10,880,562	5.7635	62,709,577	0.10768	6,752,810
2068	14,661,038	10,898,997	5.9571	64,926,434	0.10155	6,593,295
2069	14,636,241	10,880,562	6.1573	66,994,457	0.09577	6,415,790
2070	14,636,241	10,880,562	6.3641	69,245,471	0.09031	6,253,640
2071	14,636,241	10,880,562	6.5780	71,572,119	0.08517	6,095,589
2072	14,661,038	10,898,997	6.7990	74,102,277	0.08032	5,951,599
2073	14,636,241	10,880,562	7.0274	76,462,568	0.07574	5,791,369
2074	14,636,241	10,880,562	7.2636	79,031,710	0.07143	5,645,001
2075	14,636,241	10,880,562	7.5076	81,687,175	0.06736	5,502,332
2076	14,661,038	10,898,997	7.7599	84,574,913	0.06352	5,372,356
2077	14,636,241	10,880,562	8.0206	87,268,775	0.05990	5,227,721
2078	14,636,241	10,880,562	8.2901	90,201,006	0.05649	5,095,598
2079	14,636,241	10,880,562	8.5687	93,231,760	0.05327	4,966,814

Levelized (beginning of year payment, mid year interest)

AMOUNT TO RECOVER

	Cost Estimate Nominal \$s	Jurisdictional Cost in Nominal \$s	Escalation Factor	Jurisdictional Cost in Future \$'s	Discount Factor	Present Value to Decommission
	(1)	(2)	(3)	(4)	(5)	(6)
2080	45,346,732	33,710,701	8.8566	298,560,825	0.05024	14,999,513
2081	14,636,241	10,880,562	9.1541	99,602,189	0.04738	4,718,930
2082	14,636,241	10,880,562	9.4617	102,948,822	0.04468	4,599,666
2083	14,636,241	10,880,562	9.7796	106,407,903	0.04213	4,483,416
2084	14,661,038	10,898,997	10.1082	110,169,547	0.03973	4,377,509
2085	54,527,642	40,535,778	10.4479	423,512,326	0.03747	15,869,447
2086	14,636,241	10,880,562	10.7989	117,498,247	0.03534	4,152,001
2087	14,636,241	10,880,562	11.1618	121,446,188	0.03332	4,047,065
2088	17,116,068	12,724,063	11.5368	146,794,858	0.03143	4,613,148
2089	14,636,241	10,880,562	11.9244	129,744,479	0.02964	3,845,083
2090	14,636,241	10,880,562	12.3251	134,103,894	0.02795	3,747,905
2091	14,636,241	10,880,562	12.7392	138,609,785	0.02636	3,653,182
2092	14,661,038	10,898,997	13.1672	143,509,803	0.02485	3,566,886
2093	14,636,241	10,880,562	13.6097	148,080,847	0.02344	3,470,858
2094	14,636,241	10,880,562	14.0670	153,056,364	0.02210	3,383,138
2095	57,450,908	42,708,929	14.5396	620,970,886	0.02084	12,944,038
2096	14,661,038	10,898,997	15.0281	163,791,580	0.01966	3,219,737
2097	14,636,241	10,880,562	15.5331	169,008,634	0.01854	3,133,055
2098	14,636,241	10,880,562	16.0550	174,687,325	0.01748	3,053,872
2099	14,636,241	10,880,562	16.5944	180,556,819	0.01649	2,976,690
2100	14,636,241	10,880,562	17.1520	186,623,528	0.01555	2,901,458
2101	14,636,241	10,880,562	17.7283	192,894,078	0.01466	2,828,128
2102	14,636,241	10,880,562	18.3240	199,375,319	0.01383	2,756,652
2103	14,636,241	10,880,562	18.9397	206,074,330	0.01304	2,686,982
2104	14,661,038	10,898,997	19.5760	213,359,299	0.01230	2,623,510
2105	14,636,241	10,880,562	20.2338	220,155,175	0.01160	2,552,879
2106	14,636,241	10,880,562	20.9137	227,552,389	0.01094	2,488,359
2107	14,636,241	10,880,562	21.6164	235,198,149	0.01031	2,425,469
2108	45,346,732	33,710,701	22.3427	753,187,044	0.00973	7,324,788
2109	14,636,241	10,880,562	23.0934	251,268,994	0.00917	2,304,419
2110	14,636,241	10,880,562	23.8693	259,711,632	0.00865	2,246,178
2111	14,636,241	10,880,562	24.6713	268,437,943	0.00816	2,189,409
2112	14,661,038	10,898,997	25.5003	277,927,539	0.00769	2,137,691
2113	45,321,934	33,692,266	26.3571	888,030,311	0.00725	6,441,268
2114	14,636,241	10,880,562	27.2427	296,415,837	0.00684	2,027,567
2115	14,636,241	10,880,562	28.1580	306,375,409	0.00645	1,976,324
2116	45,346,732	33,710,701	29.1042	981,121,620	0.00608	5,968,391
2117	14,636,241	10,880,562	30.0821	327,309,722	0.00574	1,877,689
2118	14,636,241	10,880,562	31.0928	338,307,329	0.00541	1,830,233
2119	14,636,241	10,880,562	32.1375	349,674,455	0.00510	1,783,977
2120	14,661,038	10,898,997	33.2174	362,035,857	0.00481	1,741,836
2121	14,636,241	10,880,562	34.3335	373,567,347	0.00454	1,694,942
2122	14,636,241	10,880,562	35.4871	386,119,210	0.00428	1,652,105
2123	14,636,241	10,880,562	36.6794	399,092,815	0.00404	1,610,350
2124	14,661,038	10,898,997	37.9119	413,201,214	0.00381	1,572,310
2125	14,636,241	10,880,562	39.1857	426,362,412	0.00359	1,529,980
2126	14,636,241	10,880,562	40.5023	440,688,189	0.00338	1,491,313
2127	14,636,241	10,880,562	41.8632	455,495,313	0.00319	1,453,622
2128	17,116,068	12,724,063	43.2698	550,567,879	0.00301	1,656,947
2129	14,636,241	10,880,562	44.7237	486,618,834	0.00284	1,381,074
2130	45,321,934	33,692,266	46.2264	1,557,472,190	0.00268	4,168,489
2131	14,636,241	10,880,562	47.7796	519,868,992	0.00252	1,312,147

Levelized (beginning of year payment, mid year interest)

AMOUNT TO RECOVER

	Cost Estimate Nominal \$s	Jurisdictional Cost in Nominal \$s	Escalation Factor	Jurisdictional Cost in Future \$'s	Discount Factor	Present Value to Decommission
	(1)	(2)	(3)	(4)	(5)	(6)
2132	14,661,038	10,898,997	49.3850	538,246,971	0.00238	1,281,152
2133	14,636,241	10,880,562	51.0443	555,391,100	0.00224	1,246,660
2134	14,636,241	10,880,562	52.7594	574,052,241	0.00212	1,215,153
2135	54,527,642	40,535,778	54.5321	2,210,502,890	0.00200	4,412,664
2136	14,661,038	10,898,997	56.3644	614,315,675	0.00188	1,156,463
2137	14,636,241	10,880,562	58.2583	633,882,729	0.00178	1,125,328
2138	14,636,241	10,880,562	60.2157	655,181,188	0.00167	1,096,887
2139	14,636,241	10,880,562	62.2390	677,195,276	0.00158	1,069,165
2140	14,661,038	10,898,997	64.3302	701,134,923	0.00149	1,043,909
2141	14,636,241	10,880,562	66.4917	723,467,325	0.00140	1,015,805
2142	14,636,241	10,880,562	68.7258	747,775,827	0.00132	990,132
2143	14,636,241	10,880,562	71.0350	772,901,095	0.00125	965,108
2144	14,661,038	10,898,997	73.4218	800,224,055	0.00118	942,310
2145	57,450,908	42,708,929	75.8888	3,241,128,660	0.00111	3,599,224
2146	14,636,241	10,880,562	78.4386	853,456,567	0.00105	893,767
2147	14,636,241	10,880,562	81.0742	882,132,708	0.00099	871,178
2148	14,661,038	10,898,997	83.7983	913,317,133	0.00093	850,599
2149	14,636,241	10,880,562	86.6139	942,407,918	0.00088	827,699
2150	14,636,241	10,880,562	89.5241	974,072,824	0.00083	806,781
2151	14,636,241	10,880,562	92.5321	1,006,801,671	0.00078	786,390
2152	14,661,038	10,898,997	95.6412	1,042,393,291	0.00074	767,814
2153	14,636,241	10,880,562	98.8548	1,075,595,382	0.00069	747,143
2154	14,636,241	10,880,562	102.1763	1,111,735,387	0.00066	728,260
2155	14,636,241	10,880,562	105.6094	1,149,089,696	0.00062	709,854
2156	14,661,038	10,898,997	109.1579	1,189,711,364	0.00058	693,086
2157	14,636,241	10,880,562	112.8256	1,227,605,800	0.00055	674,427
2158	45,321,934	33,692,266	116.6165	3,929,075,001	0.00052	2,035,619
2159	14,636,241	10,880,562	120.5348	1,311,486,828	0.00049	640,767
2160	14,661,038	10,898,997	124.5848	1,357,849,425	0.00046	625,631
2161	14,636,241	10,880,562	128.7709	1,401,099,359	0.00043	608,788
2162	14,636,241	10,880,562	133.0976	1,448,176,297	0.00041	593,402
2163	45,321,934	33,692,266	137.5696	4,635,032,912	0.00039	1,791,061
2164	14,661,038	10,898,997	142.1920	1,549,749,894	0.00036	564,741
2165	14,636,241	10,880,562	146.9696	1,599,112,201	0.00034	549,537
2166	45,321,934	33,692,266	151.9078	5,118,118,350	0.00032	1,658,666
2167	14,636,241	10,880,562	157.0119	1,708,377,875	0.00031	522,111
2168	17,116,068	12,724,063	162.2875	2,064,956,446	0.00029	595,141
2169	14,636,241	10,880,562	167.7404	1,825,109,558	0.00027	496,053
2170	14,636,241	10,880,562	173.3764	1,886,433,239	0.00026	483,516
2171	14,636,241	10,880,562	179.2019	1,949,817,396	0.00024	471,296
2172	14,661,038	10,898,997	185.2231	2,018,745,727	0.00023	460,163
2173	14,636,241	10,880,562	191.4466	2,083,046,391	0.00021	447,775
2174	14,636,241	10,880,562	197.8792	2,153,036,750	0.00020	436,458
2175	14,636,241	10,880,562	204.5279	2,225,378,784	0.00019	425,427
2176	14,661,038	10,898,997	211.4001	2,304,048,534	0.00018	415,377
2177	14,636,241	10,880,562	218.5031	2,377,436,602	0.00017	404,195
2178	14,636,241	10,880,562	225.8448	2,457,318,472	0.00016	393,979
2179	14,636,241	10,880,562	233.4332	2,539,884,373	0.00015	384,022
2180	45,346,732	33,710,701	241.2765	8,133,601,445	0.00014	1,159,726
2181	14,636,241	10,880,562	249.3834	2,713,432,030	0.00013	364,856
2182	14,636,241	10,880,562	257.7627	2,804,603,347	0.00013	355,635
2183	14,636,241	10,880,562	266.4235	2,898,838,019	0.00012	346,647

Levelized (beginning of year payment, mid year interest)

AMOUNT TO RECOVER

	Cost Estimate Nominal \$s	Jurisdictional Cost in Nominal \$s	Escalation Factor	Jurisdictional Cost in Future \$'s	Discount Factor	Present Value to Decommission
	(1)	(2)	(3)	(4)	(5)	(6)
2184	14,661,038	10,898,997	275.3754	3,001,315,342	0.00011	338,458
2185	54,527,642	40,535,778	284.6280	11,537,617,038	0.00011	1,226,987
2186	14,636,241	10,880,562	294.1915	3,200,968,870	0.00010	321,023
2187	14,636,241	10,880,562	304.0763	3,308,521,424	0.00009	312,909
2188	14,661,038	10,898,997	314.2933	3,425,481,536	0.00009	305,518
2189	14,636,241	10,880,562	324.8535	3,534,589,252	0.00008	297,292
2190	17,803,229	13,234,897	335.7686	4,443,863,306	0.00008	352,481
2191	22,553,712	16,766,400	347.0505	5,818,786,693	0.00007	435,249
2192	14,661,038	10,898,997	358.7113	3,909,593,766	0.00007	275,783
2193	20,970,218	15,589,232	370.7640	5,779,926,934	0.00007	384,493
2194	25,720,701	19,120,735	383.2217	7,327,480,988	0.00006	459,675
2195	51,865,715	38,556,904	396.0980	15,272,311,626	0.00006	903,507
2196	9,075,845	6,746,972	409.4069	2,762,256,468	0.00006	154,106
2197	9,051,048	6,728,537	423.1629	2,847,267,552	0.00005	149,801
2198	9,051,048	6,728,537	437.3812	2,942,935,742	0.00005	146,015
2199	9,051,048	6,728,537	452.0772	3,041,818,383	0.00005	142,325
2200	9,051,048	6,728,537	467.2670	3,144,023,481	0.00004	138,728
2201	9,051,048	6,728,537	482.9672	3,249,662,670	0.00004	135,222
2202	9,051,048	6,728,537	499.1949	3,358,851,335	0.00004	131,804
2203	9,051,048	6,728,537	515.9678	3,471,708,740	0.00004	128,473
2204	9,075,845	6,746,972	533.3043	3,598,189,272	0.00003	125,569
2205	9,051,048	6,728,537	551.2234	3,708,926,988	0.00003	122,061
2206	9,051,048	6,728,537	569.7445	3,833,546,935	0.00003	118,976
2207	9,051,048	6,728,537	588.8879	3,962,354,112	0.00003	115,969
2208	42,216,569	31,383,742	608.6745	19,102,484,052	0.00003	527,242
2209	9,051,048	6,728,537	629.1260	4,233,097,647	0.00003	110,182
2210	9,051,048	6,728,537	650.2646	4,375,329,728	0.00002	107,397
2211	9,051,048	6,728,537	672.1135	4,522,340,807	0.00002	104,683
2212	9,075,845	6,746,972	694.6965	4,687,097,736	0.00002	102,316
2213	39,736,741	29,540,241	718.0383	21,211,025,606	0.00002	436,650
2214	9,051,048	6,728,537	742.1644	4,993,680,932	0.00002	96,944
2215	9,051,048	6,728,537	767.1011	5,161,468,612	0.00002	94,494
2216	9,075,845	6,746,972	792.8757	5,349,510,105	0.00002	92,358
2217	6,867,010	5,104,927	819.5164	4,183,570,843	0.00002	68,115
2218	8,212,367	6,105,063	847.0521	5,171,306,259	0.00002	79,401
2219	7,876,028	5,855,029	875.5131	5,126,154,084	0.00001	74,224
2220	7,892,998	5,867,645	904.9303	5,309,809,508	0.00001	72,504
2221	7,876,028	5,855,029	935.3360	5,476,418,862	0.00001	70,520
2222	8,212,367	6,105,063	966.7633	5,902,150,253	0.00001	71,673
2223	7,876,028	5,855,029	999.2465	5,850,616,867	0.00001	67,000
2224	7,892,998	5,867,645	1,032.8212	6,060,227,718	0.00001	65,448
2225	7,876,028	5,855,029	1,067.5240	6,250,383,433	0.00001	63,656
2226	8,212,367	6,105,063	1,103.3928	6,736,282,065	0.00001	64,697
2227	7,876,028	5,855,029	1,140.4668	6,677,465,632	0.00001	60,479
2228	7,892,998	5,867,645	1,178.7865	6,916,700,107	0.00001	59,078
2229	7,876,028	5,855,029	1,218.3937	7,133,729,915	0.00001	57,461
2230	16,469,129	12,243,129	1,259.3317	15,418,160,555	0.00001	117,117
2231	9,753,500	7,250,739	1,301.6453	9,437,890,134	0.00001	67,607
	\$4,144,730,940	\$3,081,187,526		\$399,334,353,359		\$1,752,699,979

Levelized (beginning of year payment, mid year interest)

AMOUNT TO RECOVER

	Cost Estimate Nominal \$s	Jurisdictional Cost in Nominal \$s	Escalation Factor	Jurisdictional Cost in Future \$'s	Discount Factor	Present Value to Decommission
	(1)	(2)	(3)	(4)	(5)	(6)
Prairie Island Unit 1			4.36%			
<i>Factors</i>	<i>2014</i>	<i>74.3399%</i>	<i>3.36%</i>		<i>6.01%</i>	<i>2033</i>
2033	\$26,355,519	\$19,592,658	2.2498	\$44,079,910	0.94331	\$41,580,898
2034	82,603,271	61,407,163	2.3479	144,178,479	0.88983	128,294,125
2035	134,086,555	99,679,768	2.4503	244,243,210	0.83938	205,013,281
2036	106,909,326	79,476,253	2.5571	203,229,585	0.79179	160,916,135
2037	61,196,063	45,493,073	2.6686	121,402,852	0.74691	90,676,494
2038	7,221,467	5,368,429	2.7850	14,950,816	0.70456	10,533,771
2039	13,874,102	10,313,989	2.9064	29,976,329	0.66462	19,922,810
2040	7,241,251	5,383,137	3.0331	16,327,558	0.62694	10,236,384
2041	20,526,738	15,259,550	3.1653	48,301,613	0.59140	28,565,387
2042	7,221,467	5,368,429	3.3033	17,733,774	0.55787	9,893,110
2043	20,526,738	15,259,550	3.4474	52,605,333	0.52624	27,683,092
2044	7,241,251	5,383,137	3.5977	19,366,785	0.49641	9,613,810
2045	20,526,738	15,259,550	3.7545	57,292,518	0.46826	26,828,047
2046	7,221,467	5,368,429	3.9182	21,034,755	0.44172	9,291,413
2047	20,526,738	15,259,550	4.0891	62,397,337	0.41668	25,999,413
2048	7,241,251	5,383,137	4.2674	22,971,736	0.39305	9,029,100
2049	33,866,524	25,176,330	4.4534	112,120,463	0.37077	41,570,830
2050	38,410,156	28,554,059	4.6476	132,707,171	0.34975	46,414,253
2051	29,910,708	22,235,581	4.8502	107,847,252	0.32992	35,581,088
2052	31,179,465	23,178,773	5.0617	117,323,529	0.31122	36,513,076
2053	25,644,821	19,064,326	5.2824	100,704,808	0.29357	29,564,237
2054	19,909,683	14,800,832	3.7506	55,511,907	0.27693	15,372,900
2055	19,909,683	14,800,832	3.8766	57,377,108	0.26123	14,988,613
2056	15,262,758	11,346,314	4.0069	45,463,183	0.24642	11,203,038
2057	11,525,136	8,567,771	4.1415	35,483,413	0.23245	8,248,112
2058	11,525,136	8,567,771	4.2807	36,675,656	0.21927	8,041,928
2059	4,072,206	3,027,273	4.4245	13,394,117	0.20684	2,770,445
2060	15,262,758	11,346,314	4.5731	51,888,347	0.19511	10,124,148
2061	11,525,136	8,567,771	4.7268	40,498,169	0.18405	7,453,791
2062	15,251,601	11,338,020	4.8856	55,393,303	0.17362	9,617,279
2063	15,251,601	11,338,020	5.0498	57,254,518	0.16378	9,376,870
2064	4,083,363	3,035,567	5.2195	15,844,000	0.15449	2,447,745
2065	11,525,136	8,567,771	5.3948	46,221,645	0.14573	6,735,966
2066	4,072,206	3,027,273	5.5761	16,880,356	0.13747	2,320,541
2067	15,251,601	11,338,020	5.7635	65,346,114	0.12968	8,473,846
2068	11,536,293	8,576,065	5.9571	51,088,494	0.12232	6,249,382
2069	4,072,206	3,027,273	6.1573	18,639,708	0.11539	2,150,831
2070	15,251,601	11,338,020	6.3641	72,156,801	0.10885	7,854,120
2071	11,525,136	8,567,771	6.5780	56,358,626	0.10268	5,786,738
2072	4,083,363	3,035,567	6.7990	20,638,818	0.09686	1,998,994
2073	11,525,136	8,567,771	7.0274	60,209,553	0.09136	5,501,045
2074	15,251,601	11,338,020	7.2636	82,354,488	0.08619	7,097,742
2075	5,299,721	3,939,806	7.5076	29,578,583	0.08130	2,404,714
2076	11,536,293	8,576,065	7.7599	66,549,242	0.07669	5,103,668
2077	15,251,601	11,338,020	8.0206	90,937,869	0.07234	6,578,657
2078	4,072,206	3,027,273	8.2901	25,096,411	0.06824	1,712,605

Levelized (beginning of year payment, mid year interest)

AMOUNT TO RECOVER

	Cost Estimate Nominal \$s	Jurisdictional Cost in Nominal \$s	Escalation Factor	Jurisdictional Cost in Future \$'s	Discount Factor	Present Value to Decommission
	(1)	(2)	(3)	(4)	(5)	(6)
2079	11,525,136	8,567,771	8.5687	73,414,256	0.06437	4,725,842
2080	11,536,293	8,576,065	8.8566	75,954,431	0.06072	4,612,167
2081	4,072,206	3,027,273	9.1541	27,712,079	0.05728	1,587,356
2082	7,798,671	5,797,522	9.4617	54,854,524	0.05403	2,963,949
2083	4,072,206	3,027,273	9.7796	29,605,617	0.05097	1,508,987
2084	4,083,363	3,035,567	10.1082	30,684,202	0.04808	1,475,297
2085	11,525,136	8,567,771	10.4479	89,514,916	0.04535	4,059,880
2086	26,430,996	19,648,768	10.7989	212,185,337	0.04278	9,077,919
2087	4,072,206	3,027,273	11.1618	33,789,683	0.04036	1,363,667
2088	18,989,223	14,116,563	11.5368	162,859,851	0.03807	6,199,994
2089	4,072,206	3,027,273	11.9244	36,098,497	0.03591	1,296,342
2090	11,525,136	8,567,771	12.3251	105,598,539	0.03388	3,577,186
2091	4,072,206	3,027,273	12.7392	38,565,070	0.03195	1,232,341
2092	18,989,223	14,116,563	13.1672	185,876,307	0.03014	5,602,914
2093	4,072,206	3,027,273	13.6097	41,200,181	0.02843	1,171,500
2094	18,978,066	14,108,270	14.0670	198,460,372	0.02682	5,323,167
2095	4,072,206	3,027,273	14.5396	44,015,346	0.02530	1,113,662
2096	18,989,223	14,116,563	15.0281	212,145,604	0.02387	5,063,335
2097	4,072,206	3,027,273	15.5331	47,022,869	0.02251	1,058,680
2098	18,978,066	14,108,270	16.0550	226,508,134	0.02124	4,810,528
2099	4,072,206	3,027,273	16.5944	50,235,893	0.02003	1,006,413
2100	26,286,010	19,540,985	17.1520	335,167,205	0.01890	6,333,981
2101	4,072,206	3,027,273	17.7283	53,668,459	0.01783	956,726
2102	19,909,683	14,800,832	18.3240	271,210,301	0.01682	4,560,661
2103	19,909,683	14,800,832	18.9397	280,322,968	0.01586	4,446,655
2104	19,920,839	14,809,126	19.5760	289,904,181	0.01496	4,337,929
2105	19,909,683	14,800,832	20.2338	299,477,144	0.01412	4,227,122
2106	15,251,601	11,338,020	20.9137	237,119,512	0.01331	3,157,196
2107	11,525,136	8,567,771	21.6164	185,204,025	0.01256	2,326,151
2108	11,536,293	8,576,065	22.3427	191,612,188	0.01185	2,270,198
2109	4,072,206	3,027,273	23.0934	69,909,973	0.01118	781,327
2110	15,251,601	11,338,020	23.8693	270,630,846	0.01054	2,853,147
2111	11,525,136	8,567,771	24.6713	211,378,311	0.00994	2,102,134
2112	15,262,758	11,346,314	25.5003	289,334,267	0.00938	2,714,270
2113	15,251,601	11,338,020	26.3571	298,837,296	0.00885	2,644,486
2114	4,072,206	3,027,273	27.2427	82,471,071	0.00835	688,432
2115	12,752,651	9,480,304	28.1580	266,946,873	0.00787	2,102,024
2116	4,083,363	3,035,567	29.1042	88,347,621	0.00743	656,237
2117	15,251,601	11,338,020	30.0821	341,071,004	0.00701	2,389,813
2118	11,525,136	8,567,771	31.0928	266,396,141	0.00661	1,760,760
2119	4,072,206	3,027,273	32.1375	97,289,090	0.00623	606,582
2120	15,262,758	11,346,314	33.2174	376,894,568	0.00588	2,216,657
2121	11,525,136	8,567,771	34.3335	294,161,229	0.00555	1,631,989
2122	4,072,206	3,027,273	35.4871	107,429,027	0.00523	562,220
2123	11,525,136	8,567,771	36.6794	314,260,959	0.00494	1,551,417
2124	15,262,758	11,346,314	37.9119	430,159,858	0.00466	2,003,185
2125	4,072,206	3,027,273	39.1857	118,625,797	0.00439	521,103
2126	11,525,136	8,567,771	40.5023	347,014,749	0.00414	1,437,956

Levelized (beginning of year payment, mid year interest)

AMOUNT TO RECOVER

	Cost Estimate Nominal \$s	Jurisdictional Cost in Nominal \$s	Escalation Factor	Jurisdictional Cost in Future \$'s	Discount Factor	Present Value to Decommission
	(1)	(2)	(3)	(4)	(5)	(6)
2127	15,251,601	11,338,020	41.8632	474,645,980	0.00391	1,855,327
2128	4,083,363	3,035,567	43.2698	131,348,424	0.00369	484,316
2129	11,525,136	8,567,771	44.7237	383,182,296	0.00348	1,332,792
2130	11,525,136	8,567,771	46.2264	396,057,222	0.00328	1,299,476
2131	4,072,206	3,027,273	47.7796	144,641,910	0.00310	447,670
2132	7,809,828	5,805,816	49.3850	286,720,233	0.00292	837,095
2133	4,072,206	3,027,273	51.0443	154,525,141	0.00275	425,568
2134	4,072,206	3,027,273	52.7594	159,717,186	0.00260	414,930
2135	11,525,136	8,567,771	54.5321	467,218,940	0.00245	1,144,976
2136	26,442,153	19,657,062	56.3644	1,107,958,980	0.00231	2,561,255
2137	4,072,206	3,027,273	58.2583	176,363,680	0.00218	384,584
2138	18,978,066	14,108,270	60.2157	849,539,994	0.00206	1,747,509
2139	4,072,206	3,027,273	62.2390	188,414,427	0.00194	365,597
2140	11,536,293	8,576,065	64.3302	551,700,213	0.00183	1,009,822
2141	4,072,206	3,027,273	66.4917	201,288,588	0.00173	347,548
2142	18,978,066	14,108,270	68.7258	969,602,734	0.00163	1,579,218
2143	4,072,206	3,027,273	71.0350	215,042,428	0.00154	330,389
2144	18,989,223	14,116,563	73.4218	1,036,463,634	0.00145	1,502,134
2145	4,072,206	3,027,273	75.8888	229,736,054	0.00137	314,078
2146	18,978,066	14,108,270	78.4386	1,106,633,554	0.00129	1,427,134
2147	4,072,206	3,027,273	81.0742	245,433,680	0.00122	298,571
2148	18,989,223	14,116,563	83.7983	1,182,943,688	0.00115	1,357,473
2149	4,072,206	3,027,273	86.6139	262,203,908	0.00108	283,831
2150	26,286,010	19,540,985	89.5241	1,749,389,641	0.00102	1,786,323
2151	4,072,206	3,027,273	92.5321	280,120,028	0.00096	269,818
2152	19,920,839	14,809,126	95.6412	1,416,362,795	0.00091	1,286,928
2153	19,909,683	14,800,832	98.8548	1,463,132,693	0.00086	1,254,055
2154	19,909,683	14,800,832	102.1763	1,512,293,952	0.00081	1,222,707
2155	21,137,198	15,713,365	105.6094	1,659,479,092	0.00076	1,265,643
2156	15,262,758	11,346,314	109.1579	1,238,539,612	0.00072	891,051
2157	11,525,136	8,567,771	112.8256	966,663,797	0.00068	656,026
2158	11,525,136	8,567,771	116.6165	999,143,701	0.00064	639,627
2159	4,072,206	3,027,273	120.5348	364,891,852	0.00060	220,352
2160	15,262,758	11,346,314	124.5848	1,413,578,411	0.00057	805,240
2161	11,525,136	8,567,771	128.7709	1,103,279,266	0.00054	592,849
2162	15,251,601	11,338,020	133.0976	1,509,062,856	0.00051	764,925
2163	15,251,601	11,338,020	137.5696	1,559,767,368	0.00048	745,804
2164	4,083,363	3,035,567	142.1920	431,633,248	0.00045	194,685
2165	11,525,136	8,567,771	146.9696	1,259,202,158	0.00043	535,755
2166	4,072,206	3,027,273	151.9078	459,866,391	0.00040	184,568
2167	15,251,601	11,338,020	157.0119	1,780,204,247	0.00038	673,980
2168	11,536,293	8,576,065	162.2875	1,391,788,264	0.00036	497,054
2169	4,072,206	3,027,273	167.7404	507,795,880	0.00034	171,070
2170	15,251,601	11,338,020	173.3764	1,965,745,702	0.00032	624,689
2171	11,525,136	8,567,771	179.2019	1,535,360,853	0.00030	460,257
2172	4,083,363	3,035,567	185.2231	562,257,032	0.00028	158,993
2173	11,525,136	8,567,771	191.4466	1,640,270,463	0.00027	437,534
2174	15,251,601	11,338,020	197.8792	2,243,558,186	0.00025	564,530

Levelized (beginning of year payment, mid year interest)

AMOUNT TO RECOVER

	Cost Estimate Nominal \$s	Jurisdictional Cost in Nominal \$s	Escalation Factor	Jurisdictional Cost in Future \$'s	Discount Factor	Present Value to Decommission
	(1)	(2)	(3)	(4)	(5)	(6)
2175	4,072,206	3,027,273	204.5279	619,161,832	0.00024	146,963
2176	11,536,293	8,576,065	211.4001	1,812,980,676	0.00022	405,928
2177	15,251,601	11,338,020	218.5031	2,477,392,619	0.00021	523,243
2178	4,072,206	3,027,273	225.8448	683,693,858	0.00020	136,215
2179	11,525,136	8,567,771	233.4332	2,000,002,177	0.00019	375,877
2180	11,536,293	8,576,065	241.2765	2,069,203,373	0.00018	366,836
2181	4,072,206	3,027,273	249.3834	754,951,723	0.00017	126,253
2182	7,798,671	5,797,522	257.7627	1,494,385,065	0.00016	235,742
2183	4,072,206	3,027,273	266.4235	806,536,789	0.00015	120,020
2184	4,083,363	3,035,567	275.3754	835,920,360	0.00014	117,340
2185	11,525,136	8,567,771	284.6280	2,438,627,530	0.00013	322,909
2186	26,430,996	19,648,768	294.1915	5,780,500,376	0.00012	722,026
2187	4,072,206	3,027,273	304.0763	920,522,025	0.00012	108,461
2188	18,989,223	14,116,563	314.2933	4,436,741,208	0.00011	493,126
2189	4,072,206	3,027,273	324.8535	983,420,338	0.00010	103,107
2190	11,525,136	8,567,771	335.7686	2,876,788,776	0.00010	284,517
2191	3,869,024	2,876,228	347.0505	998,196,069	0.00009	93,126
2192	19,120,902	14,214,453	358.7113	5,098,885,693	0.00009	448,727
2193	4,205,363	3,126,262	370.7640	1,159,105,399	0.00008	96,224
2194	19,279,393	14,332,275	383.2217	5,492,439,186	0.00008	430,109
2195	5,264,709	3,913,778	396.0980	1,550,239,339	0.00007	114,516
2196	19,457,241	14,464,487	409.4069	5,921,860,372	0.00007	412,646
2197	4,037,194	3,001,245	423.1629	1,270,015,450	0.00007	83,480
2198	18,774,884	13,957,224	437.3812	6,104,627,576	0.00006	378,516
2199	4,205,363	3,126,262	452.0772	1,413,311,630	0.00006	82,664
2200	26,250,998	19,514,957	467.2670	9,118,695,696	0.00006	503,112
2201	4,205,363	3,126,262	482.9672	1,509,881,744	0.00005	78,583
2202	4,205,363	3,126,262	499.1949	1,560,613,771	0.00005	76,618
2203	4,205,363	3,126,262	515.9678	1,613,050,393	0.00005	74,703
2204	4,046,872	3,008,440	533.3043	1,604,413,920	0.00004	70,091
2205	4,205,363	3,126,262	551.2234	1,723,268,449	0.00004	71,015
2206	4,205,363	3,126,262	569.7445	1,781,170,269	0.00004	69,240
2207	4,037,194	3,001,245	588.8879	1,767,396,582	0.00004	64,809
2208	4,215,042	3,133,457	608.6745	1,907,255,225	0.00003	65,973
2209	4,205,363	3,126,262	629.1260	1,966,812,407	0.00003	64,176
2210	4,037,194	3,001,245	650.2646	1,951,603,160	0.00003	60,070
2211	4,205,363	3,126,262	672.1135	2,101,202,654	0.00003	61,008
2212	4,215,042	3,133,457	694.6965	2,176,801,440	0.00003	59,620
2213	4,037,194	3,001,245	718.0383	2,155,008,635	0.00003	55,677
2214	4,205,363	3,126,262	742.1644	2,320,200,107	0.00002	56,546
2215	4,205,363	3,126,262	767.1011	2,398,158,831	0.00002	55,132
2216	4,046,872	3,008,440	792.8757	2,385,318,788	0.00002	51,728
2217	15,087,440	11,215,983	819.5164	9,191,681,539	0.00002	188,031
2218	2,615,281	1,944,197	847.0521	1,646,835,951	0.00002	31,779
	\$2,461,759,634	\$1,830,068,872		\$164,062,432,000		\$1,351,148,188

Levelized (beginning of year payment, mid year interest)

AMOUNT TO RECOVER

	Cost Estimate Nominal \$s	Jurisdictional Cost in Nominal \$s	Escalation Factor	Jurisdictional Cost in Future \$'s	Discount Factor	Present Value to Decommission
	(1)	(2)	(3)	(4)	(5)	(6)
Prairie Island Unit 2			4.36%			
<i>Factors</i>	<i>2014</i>	<i>74.3399%</i>	<i>3.36%</i>		<i>5.94%</i>	<i>2034</i>
2034	\$13,063,811	\$9,711,620	2.3479	\$22,802,008	0.94393	\$21,523,511
2035	79,023,320	58,745,832	2.4503	143,943,658	0.89100	128,254,496
2036	122,429,706	91,014,083	2.5571	232,733,095	0.84105	195,739,394
2037	118,076,175	87,777,673	2.6686	234,243,574	0.79389	185,963,543
2038	99,702,549	74,118,743	2.7850	206,417,131	0.74938	154,684,178
2039	27,921,161	20,756,555	2.9064	60,326,347	0.70736	42,672,414
2040	15,806,355	11,750,424	3.0331	35,640,136	0.66770	23,796,856
2041	29,068,440	21,609,440	3.1653	68,401,151	0.63026	43,110,560
2042	15,763,168	11,718,319	3.3033	38,709,653	0.59492	23,029,237
2043	29,068,440	21,609,440	3.4474	74,495,760	0.56157	41,834,238
2044	15,806,355	11,750,424	3.5977	42,274,223	0.53008	22,408,665
2045	29,068,440	21,609,440	3.7545	81,133,403	0.50036	40,595,703
2046	15,763,168	11,718,319	3.9182	45,915,102	0.47230	21,685,826
2047	29,068,440	21,609,440	4.0891	88,362,467	0.44582	39,393,836
2048	15,806,355	11,750,424	4.2674	50,143,185	0.42082	21,101,454
2049	41,746,842	31,034,548	4.4534	138,209,496	0.39723	54,900,764
2050	43,612,125	32,421,196	4.6476	150,679,986	0.37496	56,498,394
2051	35,229,480	26,189,549	4.8502	127,024,830	0.35393	44,958,228
2052	36,213,246	26,920,880	5.0617	136,264,875	0.33409	45,524,430
2053	28,010,423	20,822,912	5.2824	109,994,306	0.31536	34,687,327
2054	19,909,683	14,800,832	3.7506	55,511,907	0.29767	16,524,442
2055	19,909,683	14,800,832	3.8766	57,377,108	0.28098	16,122,016
2056	15,262,758	11,346,314	4.0069	45,463,183	0.26523	12,058,147
2057	11,525,136	8,567,771	4.1415	35,483,413	0.25036	8,883,542
2058	11,525,136	8,567,771	4.2807	36,675,656	0.23632	8,667,197
2059	4,072,206	3,027,273	4.4245	13,394,117	0.22307	2,987,823
2060	15,262,758	11,346,314	4.5731	51,888,347	0.21056	10,925,736
2061	11,525,136	8,567,771	4.7268	40,498,169	0.19876	8,049,266
2062	15,251,601	11,338,020	4.8856	55,393,303	0.18761	10,392,456
2063	15,251,601	11,338,020	5.0498	57,254,518	0.17709	10,139,364
2064	4,083,363	3,035,567	5.2195	15,844,000	0.16716	2,648,536
2065	11,525,136	8,567,771	5.3948	46,221,645	0.15779	7,293,339
2066	4,072,206	3,027,273	5.5761	16,880,356	0.14894	2,514,216
2067	15,251,601	11,338,020	5.7635	65,346,114	0.14059	9,187,151
2068	11,536,293	8,576,065	5.9571	51,088,494	0.13271	6,779,914
2069	4,072,206	3,027,273	6.1573	18,639,708	0.12527	2,334,964
2070	15,251,601	11,338,020	6.3641	72,156,801	0.11824	8,532,149
2071	11,525,136	8,567,771	6.5780	56,358,626	0.11161	6,290,448
2072	4,083,363	3,035,567	6.7990	20,638,818	0.10536	2,174,433
2073	11,525,136	8,567,771	7.0274	60,209,553	0.09945	5,987,791
2074	15,251,601	11,338,020	7.2636	82,354,488	0.09387	7,730,873
2075	5,299,721	3,939,806	7.5076	29,578,583	0.08861	2,620,950
2076	11,536,293	8,576,065	7.7599	66,549,242	0.08364	5,566,272
2077	15,251,601	11,338,020	8.0206	90,937,869	0.07895	7,179,698
2078	4,072,206	3,027,273	8.2901	25,096,411	0.07452	1,870,308
2079	11,525,136	8,567,771	8.5687	73,414,256	0.07035	5,164,423
2080	11,536,293	8,576,065	8.8566	75,954,431	0.06640	5,043,530

Levelized (beginning of year payment, mid year interest)

AMOUNT TO RECOVER

	Cost Estimate Nominal \$s	Jurisdictional Cost in Nominal \$s	Escalation Factor	Jurisdictional Cost in Future \$'s	Discount Factor	Present Value to Decommission
	(1)	(2)	(3)	(4)	(5)	(6)
2081	4,072,206	3,027,273	9.1541	27,712,079	0.06268	1,736,963
2082	7,798,671	5,797,522	9.4617	54,854,524	0.05916	3,245,443
2083	4,072,206	3,027,273	9.7796	29,605,617	0.05585	1,653,391
2084	4,083,363	3,035,567	10.1082	30,684,202	0.05272	1,617,545
2085	11,525,136	8,567,771	10.4479	89,514,916	0.04976	4,454,275
2086	26,430,996	19,648,768	10.7989	212,185,337	0.04697	9,966,371
2087	4,072,206	3,027,273	11.1618	33,789,683	0.04434	1,498,117
2088	18,989,223	14,116,563	11.5368	162,859,851	0.04185	6,815,783
2089	4,072,206	3,027,273	11.9244	36,098,497	0.03950	1,426,037
2090	11,525,136	8,567,771	12.3251	105,598,539	0.03729	3,937,673
2091	4,072,206	3,027,273	12.7392	38,565,070	0.03520	1,357,425
2092	18,989,223	14,116,563	13.1672	185,876,307	0.03322	6,175,696
2093	4,072,206	3,027,273	13.6097	41,200,181	0.03136	1,292,115
2094	18,978,066	14,108,270	14.0670	198,460,372	0.02960	5,875,106
2095	4,072,206	3,027,273	14.5396	44,015,346	0.02794	1,229,946
2096	18,989,223	14,116,563	15.0281	212,145,604	0.02638	5,595,721
2097	4,072,206	3,027,273	15.5331	47,022,869	0.02490	1,170,769
2098	18,978,066	14,108,270	16.0550	226,508,134	0.02350	5,323,360
2099	4,072,206	3,027,273	16.5944	50,235,893	0.02218	1,114,439
2100	26,286,010	19,540,985	17.1520	335,167,205	0.02094	7,018,489
2101	4,072,206	3,027,273	17.7283	53,668,459	0.01977	1,060,819
2102	19,909,683	14,800,832	18.3240	271,210,301	0.01866	5,060,208
2103	19,909,683	14,800,832	18.9397	280,322,968	0.01761	4,936,974
2104	19,920,839	14,809,126	19.5760	289,904,181	0.01662	4,819,441
2105	19,909,683	14,800,832	20.2338	299,477,144	0.01569	4,699,438
2106	15,251,601	11,338,020	20.9137	237,119,512	0.01481	3,512,284
2107	11,525,136	8,567,771	21.6164	185,204,025	0.01398	2,589,481
2108	11,536,293	8,576,065	22.3427	191,612,188	0.01320	2,528,864
2109	4,072,206	3,027,273	23.0934	69,909,973	0.01246	870,927
2110	15,251,601	11,338,020	23.8693	270,630,846	0.01176	3,182,436
2111	11,525,136	8,567,771	24.6713	211,378,311	0.01110	2,346,296
2112	15,262,758	11,346,314	25.5003	289,334,267	0.01048	3,031,533
2113	15,251,601	11,338,020	26.3571	298,837,296	0.00989	2,955,543
2114	4,072,206	3,027,273	27.2427	82,471,071	0.00934	769,917
2115	12,752,651	9,480,304	28.1580	266,946,873	0.00881	2,352,380
2116	4,083,363	3,035,567	29.1042	88,347,621	0.00832	734,882
2117	15,251,601	11,338,020	30.0821	341,071,004	0.00785	2,677,981
2118	11,525,136	8,567,771	31.0928	266,396,141	0.00741	1,974,379
2119	4,072,206	3,027,273	32.1375	97,289,090	0.00700	680,623
2120	15,262,758	11,346,314	33.2174	376,894,568	0.00660	2,488,872
2121	11,525,136	8,567,771	34.3335	294,161,229	0.00623	1,833,615
2122	4,072,206	3,027,273	35.4871	107,429,027	0.00588	632,098
2123	11,525,136	8,567,771	36.6794	314,260,959	0.00555	1,745,393
2124	15,262,758	11,346,314	37.9119	430,159,858	0.00524	2,255,136
2125	4,072,206	3,027,273	39.1857	118,625,797	0.00495	587,032
2126	11,525,136	8,567,771	40.5023	347,014,749	0.00467	1,620,955
2127	15,251,601	11,338,020	41.8632	474,645,980	0.00441	2,092,824
2128	4,083,363	3,035,567	43.2698	131,348,424	0.00416	546,673
2129	11,525,136	8,567,771	44.7237	383,182,296	0.00393	1,505,388

Levelized (beginning of year payment, mid year interest)

AMOUNT TO RECOVER

	Cost Estimate Nominal \$s	Jurisdictional Cost in Nominal \$s	Escalation Factor	Jurisdictional Cost in Future \$'s	Discount Factor	Present Value to Decommission
	(1)	(2)	(3)	(4)	(5)	(6)
2130	11,525,136	8,567,771	46.2264	396,057,222	0.00371	1,468,727
2131	4,072,206	3,027,273	47.7796	144,641,910	0.00350	506,311
2132	7,809,828	5,805,816	49.3850	286,720,233	0.00330	947,374
2133	4,072,206	3,027,273	51.0443	154,525,141	0.00312	481,950
2134	4,072,206	3,027,273	52.7594	159,717,186	0.00294	470,213
2135	11,525,136	8,567,771	54.5321	467,218,940	0.00278	1,298,385
2136	26,442,153	19,657,062	56.3644	1,107,958,980	0.00262	2,906,343
2137	4,072,206	3,027,273	58.2583	176,363,680	0.00248	436,689
2138	18,978,066	14,108,270	60.2157	849,539,994	0.00234	1,985,579
2139	4,072,206	3,027,273	62.2390	188,414,427	0.00221	415,678
2140	11,536,293	8,576,065	64.3302	551,700,213	0.00208	1,148,911
2141	4,072,206	3,027,273	66.4917	201,288,588	0.00197	395,679
2142	18,978,066	14,108,270	68.7258	969,602,734	0.00186	1,799,108
2143	4,072,206	3,027,273	71.0350	215,042,428	0.00175	376,641
2144	18,989,223	14,116,563	73.4218	1,036,463,634	0.00165	1,713,553
2145	4,072,206	3,027,273	75.8888	229,736,054	0.00156	358,519
2146	18,978,066	14,108,270	78.4386	1,106,633,554	0.00147	1,630,149
2147	4,072,206	3,027,273	81.0742	245,433,680	0.00139	341,270
2148	18,989,223	14,116,563	83.7983	1,182,943,688	0.00131	1,552,629
2149	4,072,206	3,027,273	86.6139	262,203,908	0.00124	324,850
2150	26,286,010	19,540,985	89.5241	1,749,389,641	0.00117	2,045,833
2151	4,072,206	3,027,273	92.5321	280,120,028	0.00110	309,220
2152	19,920,839	14,809,126	95.6412	1,416,362,795	0.00104	1,475,836
2153	19,909,683	14,800,832	98.8548	1,463,132,693	0.00098	1,439,088
2154	19,909,683	14,800,832	102.1763	1,512,293,952	0.00093	1,404,042
2155	21,137,198	15,713,365	105.6094	1,659,479,092	0.00088	1,454,305
2156	15,262,758	11,346,314	109.1579	1,238,539,612	0.00083	1,024,551
2157	11,525,136	8,567,771	112.8256	966,663,797	0.00078	754,813
2158	11,525,136	8,567,771	116.6165	999,143,701	0.00074	736,431
2159	4,072,206	3,027,273	120.5348	364,891,852	0.00070	253,868
2160	15,262,758	11,346,314	124.5848	1,413,578,411	0.00066	928,333
2161	11,525,136	8,567,771	128.7709	1,103,279,266	0.00062	683,927
2162	15,251,601	11,338,020	133.0976	1,509,062,856	0.00059	883,022
2163	15,251,601	11,338,020	137.5696	1,559,767,368	0.00055	861,517
2164	4,083,363	3,035,567	142.1920	431,633,248	0.00052	225,040
2165	11,525,136	8,567,771	146.9696	1,259,202,158	0.00049	619,697
2166	4,072,206	3,027,273	151.9078	459,866,391	0.00046	213,627
2167	15,251,601	11,338,020	157.0119	1,780,204,247	0.00044	780,610
2168	11,536,293	8,576,065	162.2875	1,391,788,264	0.00041	576,073
2169	4,072,206	3,027,273	167.7404	507,795,880	0.00039	198,396
2170	15,251,601	11,338,020	173.3764	1,965,745,702	0.00037	724,956
2171	11,525,136	8,567,771	179.2019	1,535,360,853	0.00035	534,484
2172	4,083,363	3,035,567	185.2231	562,257,032	0.00033	184,756
2173	11,525,136	8,567,771	191.4466	1,640,270,463	0.00031	508,768
2174	15,251,601	11,338,020	197.8792	2,243,558,186	0.00029	656,874
2175	4,072,206	3,027,273	204.5279	619,161,832	0.00028	171,115
2176	11,536,293	8,576,065	211.4001	1,812,980,676	0.00026	472,953
2177	15,251,601	11,338,020	218.5031	2,477,392,619	0.00025	610,041
2178	4,072,206	3,027,273	225.8448	683,693,858	0.00023	158,915

Levelized (beginning of year payment, mid year interest)

AMOUNT TO RECOVER

	Cost Estimate Nominal \$s	Jurisdictional Cost in Nominal \$s	Escalation Factor	Jurisdictional Cost in Future \$'s	Discount Factor	Present Value to Decommission
	(1)	(2)	(3)	(4)	(5)	(6)
2179	11,525,136	8,567,771	233.4332	2,000,002,177	0.00022	438,809
2180	11,536,293	8,576,065	241.2765	2,069,203,373	0.00021	428,536
2181	4,072,206	3,027,273	249.3834	754,951,723	0.00020	147,586
2182	7,798,671	5,797,522	257.7627	1,494,385,065	0.00018	275,757
2183	4,072,206	3,027,273	266.4235	806,536,789	0.00017	140,485
2184	4,083,363	3,035,567	275.3754	835,920,360	0.00016	137,439
2185	11,525,136	8,567,771	284.6280	2,438,627,530	0.00016	378,469
2186	26,430,996	19,648,768	294.1915	5,780,500,376	0.00015	846,818
2187	4,072,206	3,027,273	304.0763	920,522,025	0.00014	127,291
2188	18,989,223	14,116,563	314.2933	4,436,741,208	0.00013	579,121
2189	4,072,206	3,027,273	324.8535	983,420,338	0.00012	121,167
2190	11,525,136	8,567,771	335.7686	2,876,788,776	0.00012	334,575
2191	3,869,024	2,876,228	347.0505	998,196,078	0.00011	109,582
2192	19,120,902	14,214,453	358.7113	5,098,885,703	0.00010	528,373
2193	4,205,363	3,126,262	370.7640	1,159,105,410	0.00010	113,378
2194	19,279,393	14,332,275	383.2217	5,492,439,197	0.00009	507,120
2195	5,264,709	3,913,778	396.0980	1,550,239,350	0.00009	135,109
2196	19,457,241	14,464,487	409.4069	5,921,860,383	0.00008	487,173
2197	4,037,194	3,001,245	423.1629	1,270,015,462	0.00008	98,622
2198	18,774,884	13,957,224	437.3812	6,104,627,588	0.00007	447,470
2199	4,205,363	3,126,262	452.0772	1,413,311,643	0.00007	97,787
2200	26,250,998	19,514,957	467.2670	9,118,695,709	0.00007	595,550
2201	4,205,363	3,126,262	482.9672	1,509,881,757	0.00006	93,083
2202	4,205,363	3,126,262	499.1949	1,560,613,784	0.00006	90,816
2203	4,205,363	3,126,262	515.9678	1,613,050,408	0.00005	88,604
2204	4,046,872	3,008,440	533.3043	1,604,413,934	0.00005	83,188
2205	4,205,363	3,126,262	551.2234	1,723,268,464	0.00005	84,341
2206	4,205,363	3,126,262	569.7445	1,781,170,285	0.00005	82,287
2207	4,037,194	3,001,245	588.8879	1,767,396,598	0.00004	77,073
2208	4,215,042	3,133,457	608.6745	1,907,255,242	0.00004	78,508
2209	4,205,363	3,126,262	629.1260	1,966,812,425	0.00004	76,420
2210	4,037,194	3,001,245	650.2646	1,951,603,178	0.00004	71,578
2211	4,205,363	3,126,262	672.1135	2,101,202,672	0.00003	72,743
2212	4,215,042	3,133,457	694.6965	2,176,801,459	0.00003	71,135
2213	4,037,194	3,001,245	718.0383	2,155,008,655	0.00003	66,474
2214	4,205,363	3,126,262	742.1644	2,320,200,128	0.00003	67,557
2215	4,205,363	3,126,262	767.1011	2,398,158,852	0.00003	65,912
2216	4,046,872	3,008,440	792.8757	2,385,318,810	0.00003	61,883
2217	13,735,669	10,211,078	819.5164	8,368,145,667	0.00002	204,925
2218	2,434,519	1,809,819	847.0521	1,533,010,609	0.00002	35,437
	\$2,590,943,487	\$1,926,103,978		\$163,521,989,752		\$1,624,626,930
	\$9,197,434,062	\$6,837,360,376		\$726,918,775,111		\$4,728,475,097

Levelized (beginning of year payment, mid year interest)

EXTERNAL FUND CALCULATION

Monticello

	Beginning Balance	Assumed Interest	Annuity Transfer	Decommissioning Payment	Annuity	Ending Balance	Book Expense
2014	\$451,050,728	\$12,178,370	-	-	-	\$463,229,098	-
2015	463,229,098	25,371,764	-	-	13,236,764	501,837,626	13,236,764
2016	501,837,626	32,160,421	-	-	25,458,231	559,456,278	25,458,231
2017	559,456,278	35,761,587	-	-	25,458,231	620,676,096	25,458,231
2018	620,676,096	39,587,826	-	-	25,458,231	685,722,152	25,458,231
2019	685,722,152	43,653,204	-	-	25,458,231	754,833,587	25,458,231
2020	754,833,587	47,972,669	-	-	25,458,231	828,264,486	25,458,231
2021	828,264,486	52,562,100	-	-	25,458,231	906,284,817	25,458,231
2022	906,284,817	57,438,371	-	-	25,458,231	989,181,419	25,458,231
2023	989,181,419	62,619,408	-	-	25,458,231	1,077,259,058	25,458,231
2024	1,077,259,058	68,124,261	-	-	25,458,231	1,170,841,549	25,458,231
2025	1,170,841,549	73,973,167	-	-	25,458,231	1,270,272,946	25,458,231
2026	1,270,272,946	80,187,629	-	-	25,458,231	1,375,918,806	25,458,231
2027	1,375,918,806	86,790,495	-	-	25,458,231	1,488,167,532	25,458,231
2028	1,488,167,532	93,806,040	-	-	25,458,231	1,607,431,803	25,458,231
2029	1,607,431,803	101,260,057	-	-	25,458,231	1,734,150,091	25,458,231
2030	1,734,150,091	105,319,294	-	(\$44,354,300)	19,093,673	1,814,208,758	19,093,673
2031	1,814,208,758	109,578,209	-	(163,137,715)	-	1,760,649,252	-
2032	1,760,649,252	106,343,215	-	(248,605,167)	-	1,618,387,300	-
2033	1,618,387,300	97,750,593	-	(211,263,263)	-	1,504,874,630	-
2034	1,504,874,630	90,894,428	-	(159,117,023)	-	1,436,652,034	-
2035	1,436,652,034	86,773,783	-	(149,470,550)	-	1,373,955,267	-
2036	1,373,955,267	82,986,898	-	(37,310,560)	-	1,419,631,604	-
2037	1,419,631,604	85,745,749	-	(38,831,247)	-	1,466,546,106	-
2038	1,466,546,106	88,579,385	-	(40,524,290)	-	1,514,601,201	-
2039	1,514,601,201	91,481,913	-	(42,291,149)	-	1,563,791,964	-
2040	1,563,791,964	94,453,035	-	(44,255,582)	-	1,613,989,417	-
2041	1,613,989,417	97,484,961	-	(46,059,331)	-	1,665,415,047	-
2042	1,665,415,047	100,591,069	-	(48,067,518)	-	1,717,938,598	-
2043	1,717,938,598	103,763,491	-	(50,163,261)	-	1,771,538,828	-
2044	1,771,538,828	107,000,945	-	(52,493,356)	-	1,826,046,418	-
2045	1,826,046,418	110,293,204	-	(194,262,537)	-	1,742,077,084	-
2046	1,742,077,084	105,221,456	-	(175,728,196)	-	1,671,570,344	-
2047	1,671,570,344	100,962,849	-	(92,499,403)	-	1,680,033,790	-
2048	1,680,033,790	101,474,041	-	(87,019,573)	-	1,694,488,257	-
2049	1,694,488,257	102,347,091	-	(30,168,114)	-	1,766,667,233	-
2050	1,766,667,233	106,706,701	-	(50,568,244)	-	1,822,805,690	-
2051	1,822,805,690	110,097,464	-	(52,773,020)	-	1,880,130,134	-
2052	1,880,130,134	113,559,860	-	(55,167,232)	-	1,938,522,762	-
2053	1,938,522,762	117,086,775	-	(57,475,146)	-	1,998,134,391	-
2054	1,998,134,391	120,687,317	-	(59,981,063)	-	2,058,840,646	-
2055	2,058,840,646	124,353,975	-	(42,179,737)	-	2,141,014,884	-
2056	2,141,014,884	129,317,299	-	(83,587,749)	-	2,186,744,434	-
2057	2,186,744,434	132,079,364	-	(45,061,834)	-	2,273,761,963	-
2058	2,273,761,963	137,335,223	-	(144,224,902)	-	2,266,872,283	-
2059	2,266,872,283	136,919,086	-	(48,140,863)	-	2,355,650,507	-
2060	2,355,650,507	142,281,291	-	(49,842,699)	-	2,448,089,099	-
2061	2,448,089,099	147,864,582	-	(51,430,278)	-	2,544,523,403	-
2062	2,544,523,403	153,689,214	-	(53,158,335)	-	2,645,054,281	-
2063	2,645,054,281	159,761,279	-	(170,138,562)	-	2,634,676,998	-
2064	2,634,676,998	159,134,491	-	(56,886,806)	-	2,736,924,683	-

Levelized (beginning of year payment, mid year interest)

EXTERNAL FUND CALCULATION

2065	2,736,924,683	165,310,251	-	(58,698,753)	-	2,843,536,181	-
2066	2,843,536,181	171,749,585	-	(187,871,222)	-	2,827,414,545	-
2067	2,827,414,545	170,775,839	-	(62,709,577)	-	2,935,480,806	-
2068	2,935,480,806	177,303,041	-	(64,926,434)	-	3,047,857,412	-
2069	3,047,857,412	184,090,588	-	(66,994,457)	-	3,164,953,543	-
2070	3,164,953,543	191,163,194	-	(69,245,471)	-	3,286,871,265	-
2071	3,286,871,265	198,527,024	-	(71,572,119)	-	3,413,826,171	-
2072	3,413,826,171	206,195,101	-	(74,102,277)	-	3,545,918,994	-
2073	3,545,918,994	214,173,507	-	(76,462,568)	-	3,683,629,934	-
2074	3,683,629,934	222,491,248	-	(79,031,710)	-	3,827,089,472	-
2075	3,827,089,472	231,156,204	-	(81,687,175)	-	3,976,558,501	-
2076	3,976,558,501	240,184,133	-	(84,574,913)	-	4,132,167,722	-
2077	4,132,167,722	249,582,930	-	(87,268,775)	-	4,294,481,877	-
2078	4,294,481,877	259,386,705	-	(90,201,006)	-	4,463,667,577	-
2079	4,463,667,577	269,605,522	-	(93,231,760)	-	4,640,041,339	-
2080	4,640,041,339	280,258,497	-	(298,560,825)	-	4,621,739,010	-
2081	4,621,739,010	279,153,036	-	(99,602,189)	-	4,801,289,858	-
2082	4,801,289,858	289,997,907	-	(102,948,822)	-	4,988,338,943	-
2083	4,988,338,943	301,295,672	-	(106,407,903)	-	5,183,226,712	-
2084	5,183,226,712	313,066,893	-	(110,169,547)	-	5,386,124,059	-
2085	5,386,124,059	325,321,893	-	(423,512,326)	-	5,287,933,626	-
2086	5,287,933,626	319,391,191	-	(117,498,247)	-	5,489,826,571	-
2087	5,489,826,571	331,585,525	-	(121,446,188)	-	5,699,965,908	-
2088	5,699,965,908	344,277,941	-	(146,794,858)	-	5,897,448,991	-
2089	5,897,448,991	356,205,919	-	(129,744,479)	-	6,123,910,431	-
2090	6,123,910,431	369,884,190	-	(134,103,894)	-	6,359,690,727	-
2091	6,359,690,727	384,125,320	-	(138,609,785)	-	6,605,206,262	-
2092	6,605,206,262	398,954,458	-	(143,509,803)	-	6,860,650,917	-
2093	6,860,650,917	414,383,315	-	(148,080,847)	-	7,126,953,386	-
2094	7,126,953,386	430,467,984	-	(153,056,364)	-	7,404,365,007	-
2095	7,404,365,007	447,223,646	-	(620,970,886)	-	7,230,617,767	-
2096	7,230,617,767	436,729,313	-	(163,791,580)	-	7,503,555,501	-
2097	7,503,555,501	453,214,752	-	(169,008,634)	-	7,787,761,619	-
2098	7,787,761,619	470,380,802	-	(174,687,325)	-	8,083,455,096	-
2099	8,083,455,096	488,240,688	-	(180,556,819)	-	8,391,138,965	-
2100	8,391,138,965	506,824,794	-	(186,623,528)	-	8,711,340,231	-
2101	8,711,340,231	526,164,950	-	(192,894,078)	-	9,044,611,103	-
2102	9,044,611,103	546,294,511	-	(199,375,319)	-	9,391,530,294	-
2103	9,391,530,294	567,248,430	-	(206,074,330)	-	9,752,704,394	-
2104	9,752,704,394	589,063,345	-	(213,359,299)	-	10,128,408,440	-
2105	10,128,408,440	611,755,870	-	(220,155,175)	-	10,520,009,135	-
2106	10,520,009,135	635,408,552	-	(227,552,389)	-	10,927,865,299	-
2107	10,927,865,299	660,043,064	-	(235,198,149)	-	11,352,710,214	-
2108	11,352,710,214	685,703,697	-	(753,187,044)	-	11,285,226,867	-
2109	11,285,226,867	681,627,703	-	(251,268,994)	-	11,715,585,576	-
2110	11,715,585,576	707,621,369	-	(259,711,632)	-	12,163,495,313	-
2111	12,163,495,313	734,675,117	-	(268,437,943)	-	12,629,732,487	-
2112	12,629,732,487	762,835,842	-	(277,927,539)	-	13,114,640,790	-
2113	13,114,640,790	792,124,304	-	(888,030,311)	-	13,018,734,783	-
2114	13,018,734,783	786,331,581	-	(296,415,837)	-	13,508,650,527	-
2115	13,508,650,527	815,922,492	-	(306,375,409)	-	14,018,197,610	-
2116	14,018,197,610	846,699,136	-	(981,121,620)	-	13,883,775,125	-
2117	13,883,775,125	838,580,018	-	(327,309,722)	-	14,395,045,420	-
2118	14,395,045,420	869,460,743	-	(338,307,329)	-	14,926,198,835	-
2119	14,926,198,835	901,542,410	-	(349,674,455)	-	15,478,066,789	-
2120	15,478,066,789	934,875,234	-	(362,035,857)	-	16,050,906,166	-
2121	16,050,906,166	969,474,732	-	(373,567,347)	-	16,646,813,551	-

Levelized

Levelized (beginning of year payment, mid year interest)

EXTERNAL FUND CALCULATION

<i>External</i>	2122	16,646,813,551	1,005,467,538	-	(386,119,210)	-	17,266,161,880	-
	2123	17,266,161,880	1,042,876,178	-	(399,092,815)	-	17,909,945,242	-
	2124	17,909,945,242	1,081,760,693	-	(413,201,214)	-	18,578,504,720	-
	2125	18,578,504,720	1,122,141,685	-	(426,362,412)	-	19,274,283,993	-
	2126	19,274,283,993	1,164,166,753	-	(440,688,189)	-	19,997,762,557	-
	2127	19,997,762,557	1,207,864,858	-	(455,495,313)	-	20,750,132,102	-
	2128	20,750,132,102	1,253,307,979	-	(550,567,879)	-	21,452,872,203	-
	2129	21,452,872,203	1,295,753,481	-	(486,618,834)	-	22,262,006,850	-
	2130	22,262,006,850	1,344,625,214	-	(1,557,472,190)	-	22,049,159,874	-
	2131	22,049,159,874	1,331,769,256	-	(519,868,992)	-	22,861,060,138	-
	2132	22,861,060,138	1,380,808,032	-	(538,246,971)	-	23,703,621,199	-
	2133	23,703,621,199	1,431,698,720	-	(555,391,100)	-	24,579,928,820	-
	2134	24,579,928,820	1,484,627,701	-	(574,052,241)	-	25,490,504,279	-
	2135	25,490,504,279	1,539,626,458	-	(2,210,502,890)	-	24,819,627,848	-
	2136	24,819,627,848	1,499,105,522	-	(614,315,675)	-	25,704,417,695	-
	2137	25,704,417,695	1,552,546,829	-	(633,882,729)	-	26,623,081,795	-
	2138	26,623,081,795	1,608,034,140	-	(655,181,188)	-	27,575,934,747	-
	2139	27,575,934,747	1,665,586,459	-	(677,195,276)	-	28,564,325,930	-
	2140	28,564,325,930	1,725,285,286	-	(701,134,923)	-	29,588,476,293	-
	2141	29,588,476,293	1,787,143,968	-	(723,467,325)	-	30,652,152,936	-
	2142	30,652,152,936	1,851,390,037	-	(747,775,827)	-	31,755,767,146	-
	2143	31,755,767,146	1,918,048,336	-	(772,901,095)	-	32,900,914,387	-
	2144	32,900,914,387	1,987,215,229	-	(800,224,055)	-	34,087,905,561	-
	2145	34,087,905,561	2,058,909,496	-	(3,241,128,660)	-	32,905,686,397	-
	2146	32,905,686,397	1,987,503,458	-	(853,456,567)	-	34,039,733,288	-
	2147	34,039,733,288	2,055,999,891	-	(882,132,708)	-	35,213,600,471	-
	2148	35,213,600,471	2,126,901,468	-	(913,317,133)	-	36,427,184,806	-
	2149	36,427,184,806	2,200,201,962	-	(942,407,918)	-	37,684,978,850	-
	2150	37,684,978,850	2,276,172,723	-	(974,072,824)	-	38,987,078,748	-
	2151	38,987,078,748	2,354,819,556	-	(1,006,801,671)	-	40,335,096,634	-
	2152	40,335,096,634	2,436,239,837	-	(1,042,393,291)	-	41,728,943,179	-
	2153	41,728,943,179	2,520,428,168	-	(1,075,595,382)	-	43,173,775,965	-
	2154	43,173,775,965	2,607,696,068	-	(1,111,735,387)	-	44,669,736,646	-
	2155	44,669,736,646	2,698,052,093	-	(1,149,089,696)	-	46,218,699,044	-
	2156	46,218,699,044	2,791,609,422	-	(1,189,711,364)	-	47,820,597,102	-
	2157	47,820,597,102	2,888,364,065	-	(1,227,605,800)	-	49,481,355,366	-
	2158	49,481,355,366	2,988,673,864	-	(3,929,075,001)	-	48,540,954,230	-
	2159	48,540,954,230	2,931,873,635	-	(1,311,486,828)	-	50,161,341,038	-
	2160	50,161,341,038	3,029,744,999	-	(1,357,849,425)	-	51,833,236,611	-
	2161	51,833,236,611	3,130,727,491	-	(1,401,099,359)	-	53,562,864,744	-
	2162	53,562,864,744	3,235,197,031	-	(1,448,176,297)	-	55,349,885,478	-
	2163	55,349,885,478	3,343,133,083	-	(4,635,032,912)	-	54,057,985,649	-
	2164	54,057,985,649	3,265,102,333	-	(1,549,749,894)	-	55,773,338,088	-
	2165	55,773,338,088	3,368,709,621	-	(1,599,112,201)	-	57,542,935,508	-
	2166	57,542,935,508	3,475,593,305	-	(5,118,118,350)	-	55,900,410,462	-
	2167	55,900,410,462	3,376,384,792	-	(1,708,377,875)	-	57,568,417,380	-
	2168	57,568,417,380	3,477,132,410	-	(2,064,956,446)	-	58,980,593,343	-
	2169	58,980,593,343	3,562,427,838	-	(1,825,109,558)	-	60,717,911,623	-
	2170	60,717,911,623	3,667,361,862	-	(1,886,433,239)	-	62,498,840,246	-
	2171	62,498,840,246	3,774,929,951	-	(1,949,817,396)	-	64,323,952,800	-
	2172	64,323,952,800	3,885,166,749	-	(2,018,745,727)	-	66,190,373,822	-
	2173	66,190,373,822	3,997,898,579	-	(2,083,046,391)	-	68,105,226,010	-
	2174	68,105,226,010	4,113,555,651	-	(2,153,036,750)	-	70,065,744,912	-
	2175	70,065,744,912	4,231,970,993	-	(2,225,378,784)	-	72,072,337,120	-
	2176	72,072,337,120	4,353,169,162	-	(2,304,048,534)	-	74,121,457,748	-
	2177	74,121,457,748	4,476,936,048	-	(2,377,436,602)	-	76,220,957,194	-

Levelized (beginning of year payment, mid year interest)

EXTERNAL FUND CALCULATION

2178	76,220,957,194	4,603,745,815	-	(2,457,318,472)	-	78,367,384,536	-
2179	78,367,384,536	4,733,390,026	-	(2,539,884,373)	-	80,560,890,190	-
2180	80,560,890,190	4,865,877,767	-	(8,133,601,445)	-	77,293,166,512	-
2181	77,293,166,512	4,668,507,257	-	(2,713,432,030)	-	79,248,241,738	-
2182	79,248,241,738	4,786,593,801	-	(2,804,603,347)	-	81,230,232,193	-
2183	81,230,232,193	4,906,306,024	-	(2,898,838,019)	-	83,237,700,198	-
2184	83,237,700,198	5,027,557,092	-	(3,001,315,342)	-	85,263,941,948	-
2185	85,263,941,948	5,149,942,094	-	(11,537,617,038)	-	78,876,267,004	-
2186	78,876,267,004	4,764,126,527	-	(3,200,968,870)	-	80,439,424,661	-
2187	80,439,424,661	4,858,541,250	-	(3,308,521,424)	-	81,989,444,487	-
2188	81,989,444,487	4,952,162,447	-	(3,425,481,536)	-	83,516,125,398	-
2189	83,516,125,398	5,044,373,974	-	(3,534,589,252)	-	85,025,910,120	-
2190	85,025,910,120	5,135,564,971	-	(4,443,863,306)	-	85,717,611,785	-
2191	85,717,611,785	5,177,343,752	-	(5,818,786,693)	-	85,076,168,844	-
2192	85,076,168,844	5,138,600,598	-	(3,909,593,766)	-	86,305,175,676	-
2193	86,305,175,676	5,212,832,611	-	(5,779,926,934)	-	85,738,081,354	-
2194	85,738,081,354	5,178,580,114	-	(7,327,480,988)	-	83,589,180,479	-
2195	83,589,180,479	5,048,786,501	-	(15,272,311,626)	-	73,365,655,354	-
2196	73,365,655,354	4,431,285,583	-	(2,762,256,468)	-	75,034,684,470	-
2197	75,034,684,470	4,532,094,942	-	(2,847,267,552)	-	76,719,511,859	-
2198	76,719,511,859	4,633,858,516	-	(2,942,935,742)	-	78,410,434,634	-
2199	78,410,434,634	4,735,990,252	-	(3,041,818,383)	-	80,104,606,502	-
2200	80,104,606,502	4,838,318,233	-	(3,144,023,481)	-	81,798,901,255	-
2201	81,798,901,255	4,940,653,636	-	(3,249,662,670)	-	83,489,892,221	-
2202	83,489,892,221	5,042,789,490	-	(3,358,851,335)	-	85,173,830,375	-
2203	85,173,830,375	5,144,499,355	-	(3,471,708,740)	-	86,846,620,990	-
2204	86,846,620,990	5,245,535,908	-	(3,598,189,272)	-	88,493,967,626	-
2205	88,493,967,626	5,345,035,645	-	(3,708,926,988)	-	90,130,076,282	-
2206	90,130,076,282	5,443,856,607	-	(3,833,546,935)	-	91,740,385,955	-
2207	91,740,385,955	5,541,119,312	-	(3,962,354,112)	-	93,319,151,155	-
2208	93,319,151,155	5,636,476,730	-	(19,102,484,052)	-	79,853,143,833	-
2209	79,853,143,833	4,823,129,888	-	(4,233,097,647)	-	80,443,176,073	-
2210	80,443,176,073	4,858,767,835	-	(4,375,329,728)	-	80,926,614,180	-
2211	80,926,614,180	4,887,967,496	-	(4,522,340,807)	-	81,292,240,869	-
2212	81,292,240,869	4,910,051,349	-	(4,687,097,736)	-	81,515,194,482	-
2213	81,515,194,482	4,923,517,747	-	(21,211,025,606)	-	65,227,686,622	-
2214	65,227,686,622	3,939,752,272	-	(4,993,680,932)	-	64,173,757,962	-
2215	64,173,757,962	3,876,094,981	-	(5,161,468,612)	-	62,888,384,331	-
2216	62,888,384,331	3,798,458,414	-	(5,349,510,105)	-	61,337,332,640	-
2217	61,337,332,640	3,704,774,891	-	(4,183,570,843)	-	60,858,536,688	-
2218	60,858,536,688	3,675,855,616	-	(5,171,306,259)	-	59,363,086,045	-
2219	59,363,086,045	3,585,530,397	-	(5,126,154,084)	-	57,822,462,358	-
2220	57,822,462,358	3,492,476,726	-	(5,309,809,508)	-	56,005,129,576	-
2221	56,005,129,576	3,382,709,826	-	(5,476,418,862)	-	53,911,420,541	-
2222	53,911,420,541	3,256,249,801	-	(5,902,150,253)	-	51,265,520,089	-
2223	51,265,520,089	3,096,437,413	-	(5,850,616,867)	-	48,511,340,635	-
2224	48,511,340,635	2,930,084,974	-	(6,060,227,718)	-	45,381,197,891	-
2225	45,381,197,891	2,741,024,353	-	(6,250,383,433)	-	41,871,838,811	-
2226	41,871,838,811	2,529,059,064	-	(6,736,282,065)	-	37,664,615,810	-
2227	37,664,615,810	2,274,942,795	-	(6,677,465,632)	-	33,262,092,973	-
2228	33,262,092,973	2,009,030,416	-	(6,916,700,107)	-	28,354,423,281	-
2229	28,354,423,281	1,712,607,166	-	(7,133,729,915)	-	22,933,300,533	-
2230	22,933,300,533	1,385,171,352	-	(15,418,160,555)	-	8,900,311,330	-
2231	8,900,311,330	537,578,804	-	(9,437,890,134)	-	(0)	-

Levelized (beginning of year payment, mid year interest)

EXTERNAL FUND CALCULATION

Prairie Island Unit 1

	Beginning Balance	Assumed Interest	Annuity Transfer	Decommissioning Payment	Annuity	Ending Balance	Book Expense
2014	\$357,363,226	\$9,845,357	-	-	-	\$367,208,583	-
2015	367,208,583	20,233,193	-	-	-	387,441,776	-
2016	387,441,776	24,672,340	-	-	8,365,322	420,479,437	8,365,322
2017	420,479,437	26,753,712	-	-	8,365,322	455,598,471	8,365,322
2018	455,598,471	28,966,211	-	-	8,365,322	492,930,005	8,365,322
2019	492,930,005	31,318,098	-	-	8,365,322	532,613,425	8,365,322
2020	532,613,425	33,818,153	-	-	8,365,322	574,796,900	8,365,322
2021	574,796,900	36,475,712	-	-	8,365,322	619,637,934	8,365,322
2022	619,637,934	39,300,698	-	-	8,365,322	667,303,954	8,365,322
2023	667,303,954	42,303,657	-	-	8,365,322	717,972,933	8,365,322
2024	717,972,933	45,495,802	-	-	8,365,322	771,834,057	8,365,322
2025	771,834,057	48,889,053	-	-	8,365,322	829,088,432	8,365,322
2026	829,088,432	52,496,079	-	-	8,365,322	889,949,833	8,365,322
2027	889,949,833	56,330,347	-	-	8,365,322	954,645,502	8,365,322
2028	954,645,502	60,406,174	-	-	8,365,322	1,023,416,999	8,365,322
2029	1,023,416,999	64,738,779	-	-	8,365,322	1,096,521,099	8,365,322
2030	1,096,521,099	69,344,337	-	-	8,365,322	1,174,230,758	8,365,322
2031	1,174,230,758	74,240,045	-	-	8,365,322	1,256,836,126	8,365,322
2032	1,256,836,126	79,444,184	-	-	8,365,322	1,344,645,631	8,365,322
2033	1,344,645,631	81,014,305	-	(\$44,079,910)	6,692,258	1,388,272,284	6,692,258
2034	1,388,272,284	83,435,164	-	(144,178,479)	-	1,327,528,969	-
2035	1,327,528,969	79,784,491	-	(244,243,210)	-	1,163,070,250	-
2036	1,163,070,250	69,900,522	-	(203,229,585)	-	1,029,741,187	-
2037	1,029,741,187	61,887,445	-	(121,402,852)	-	970,225,780	-
2038	970,225,780	58,310,569	-	(14,950,816)	-	1,013,585,534	-
2039	1,013,585,534	60,916,491	-	(29,976,329)	-	1,044,525,695	-
2040	1,044,525,695	62,775,994	-	(16,327,558)	-	1,090,974,131	-
2041	1,090,974,131	65,567,545	-	(48,301,613)	-	1,108,240,064	-
2042	1,108,240,064	66,605,228	-	(17,733,774)	-	1,157,111,518	-
2043	1,157,111,518	69,542,402	-	(52,605,333)	-	1,174,048,588	-
2044	1,174,048,588	70,560,320	-	(19,366,785)	-	1,225,242,123	-
2045	1,225,242,123	73,637,052	-	(57,292,518)	-	1,241,586,656	-
2046	1,241,586,656	74,619,358	-	(21,034,755)	-	1,295,171,259	-
2047	1,295,171,259	77,839,793	-	(62,397,337)	-	1,310,613,715	-
2048	1,310,613,715	78,767,884	-	(22,971,736)	-	1,366,409,864	-
2049	1,366,409,864	82,121,233	-	(112,120,463)	-	1,336,410,634	-
2050	1,336,410,634	80,318,279	-	(132,707,171)	-	1,284,021,742	-
2051	1,284,021,742	77,169,707	-	(107,847,252)	-	1,253,344,198	-
2052	1,253,344,198	75,325,986	-	(117,323,529)	-	1,211,346,655	-
2053	1,211,346,655	72,801,934	-	(100,704,808)	-	1,183,443,781	-
2054	1,183,443,781	71,124,971	-	(55,511,907)	-	1,199,056,845	-
2055	1,199,056,845	72,063,316	-	(57,377,108)	-	1,213,743,054	-
2056	1,213,743,054	72,945,958	-	(45,463,183)	-	1,241,225,829	-
2057	1,241,225,829	74,597,672	-	(35,483,413)	-	1,280,340,088	-
2058	1,280,340,088	76,948,439	-	(36,675,656)	-	1,320,612,871	-
2059	1,320,612,871	79,368,834	-	(13,394,117)	-	1,386,587,588	-
2060	1,386,587,588	83,333,914	-	(51,888,347)	-	1,418,033,154	-
2061	1,418,033,154	85,223,793	-	(40,498,169)	-	1,462,758,778	-

Levelized (beginning of year payment, mid year interest)

EXTERNAL FUND CALCULATION

2062	1,462,758,778	87,911,803	-	(55,393,303)	-	1,495,277,277	-
2063	1,495,277,277	89,866,164	-	(57,254,518)	-	1,527,888,923	-
2064	1,527,888,923	91,826,124	-	(15,844,000)	-	1,603,871,047	-
2065	1,603,871,047	96,392,650	-	(46,221,645)	-	1,654,042,053	-
2066	1,654,042,053	99,407,927	-	(16,880,356)	-	1,736,569,624	-
2067	1,736,569,624	104,367,834	-	(65,346,114)	-	1,775,591,344	-
2068	1,775,591,344	106,713,040	-	(51,088,494)	-	1,831,215,889	-
2069	1,831,215,889	110,056,075	-	(18,639,708)	-	1,922,632,256	-
2070	1,922,632,256	115,550,199	-	(72,156,801)	-	1,966,025,654	-
2071	1,966,025,654	118,158,142	-	(56,358,626)	-	2,027,825,170	-
2072	2,027,825,170	121,872,293	-	(20,638,818)	-	2,129,058,644	-
2073	2,129,058,644	127,956,424	-	(60,209,553)	-	2,196,805,516	-
2074	2,196,805,516	132,028,012	-	(82,354,488)	-	2,246,479,039	-
2075	2,246,479,039	135,013,390	-	(29,578,583)	-	2,351,913,847	-
2076	2,351,913,847	141,350,022	-	(66,549,242)	-	2,426,714,627	-
2077	2,426,714,627	145,845,549	-	(90,937,869)	-	2,481,622,307	-
2078	2,481,622,307	149,145,501	-	(25,096,411)	-	2,605,671,397	-
2079	2,605,671,397	156,600,851	-	(73,414,256)	-	2,688,857,992	-
2080	2,688,857,992	161,600,365	-	(75,954,431)	-	2,774,503,927	-
2081	2,774,503,927	166,747,686	-	(27,712,079)	-	2,913,539,533	-
2082	2,913,539,533	175,103,726	-	(54,854,524)	-	3,033,788,735	-
2083	3,033,788,735	182,330,703	-	(29,605,617)	-	3,186,513,821	-
2084	3,186,513,821	191,509,481	-	(30,684,202)	-	3,347,339,099	-
2085	3,347,339,099	201,175,080	-	(89,514,916)	-	3,458,999,263	-
2086	3,458,999,263	207,885,856	-	(212,185,337)	-	3,454,699,782	-
2087	3,454,699,782	207,627,457	-	(33,789,683)	-	3,628,537,555	-
2088	3,628,537,555	218,075,107	-	(162,859,851)	-	3,683,752,812	-
2089	3,683,752,812	221,393,544	-	(36,098,497)	-	3,869,047,859	-
2090	3,869,047,859	232,529,776	-	(105,598,539)	-	3,995,979,096	-
2091	3,995,979,096	240,158,344	-	(38,565,070)	-	4,197,572,370	-
2092	4,197,572,370	252,274,099	-	(185,876,307)	-	4,263,970,162	-
2093	4,263,970,162	256,264,607	-	(41,200,181)	-	4,479,034,588	-
2094	4,479,034,588	269,189,979	-	(198,460,372)	-	4,549,764,195	-
2095	4,549,764,195	273,440,828	-	(44,015,346)	-	4,779,189,677	-
2096	4,779,189,677	287,229,300	-	(212,145,604)	-	4,854,273,372	-
2097	4,854,273,372	291,741,830	-	(47,022,869)	-	5,098,992,333	-
2098	5,098,992,333	306,449,439	-	(226,508,134)	-	5,178,933,637	-
2099	5,178,933,637	311,253,912	-	(50,235,893)	-	5,439,951,656	-
2100	5,439,951,656	326,941,095	-	(335,167,205)	-	5,431,725,545	-
2101	5,431,725,545	326,446,705	-	(53,668,459)	-	5,704,503,791	-
2102	5,704,503,791	342,840,678	-	(271,210,301)	-	5,776,134,168	-
2103	5,776,134,168	347,145,663	-	(280,322,968)	-	5,842,956,864	-
2104	5,842,956,864	351,161,708	-	(289,904,181)	-	5,904,214,390	-
2105	5,904,214,390	354,843,285	-	(299,477,144)	-	5,959,580,531	-
2106	5,959,580,531	358,170,790	-	(237,119,512)	-	6,080,631,808	-
2107	6,080,631,808	365,445,972	-	(185,204,025)	-	6,260,873,755	-
2108	6,260,873,755	376,278,513	-	(191,612,188)	-	6,445,540,079	-
2109	6,445,540,079	387,376,959	-	(69,909,973)	-	6,763,007,065	-
2110	6,763,007,065	406,456,725	-	(270,630,846)	-	6,898,832,943	-
2111	6,898,832,943	414,619,860	-	(211,378,311)	-	7,102,074,491	-
2112	7,102,074,491	426,834,677	-	(289,334,267)	-	7,239,574,901	-
2113	7,239,574,901	435,098,452	-	(298,837,296)	-	7,375,836,057	-
2114	7,375,836,057	443,287,747	-	(82,471,071)	-	7,736,652,732	-

Levelized

Levelized (beginning of year payment, mid year interest)

EXTERNAL FUND CALCULATION

External I	2115	7,736,652,732	464,972,829	-	(266,946,873)	-	7,934,678,688	-
	2116	7,934,678,688	476,874,189	-	(88,347,621)	-	8,323,205,257	-
	2117	8,323,205,257	500,224,636	-	(341,071,004)	-	8,482,358,888	-
	2118	8,482,358,888	509,789,769	-	(266,396,141)	-	8,725,752,517	-
	2119	8,725,752,517	524,417,726	-	(97,289,090)	-	9,152,881,153	-
	2120	9,152,881,153	550,088,157	-	(376,894,568)	-	9,326,074,743	-
	2121	9,326,074,743	560,497,092	-	(294,161,229)	-	9,592,410,607	-
	2122	9,592,410,607	576,503,877	-	(107,429,027)	-	10,061,485,457	-
	2123	10,061,485,457	604,695,276	-	(314,260,959)	-	10,351,919,774	-
	2124	10,351,919,774	622,150,378	-	(430,159,858)	-	10,543,910,294	-
	2125	10,543,910,294	633,689,009	-	(118,625,797)	-	11,058,973,505	-
	2126	11,058,973,505	664,644,308	-	(347,014,749)	-	11,376,603,064	-
	2127	11,376,603,064	683,733,844	-	(474,645,980)	-	11,585,690,928	-
	2128	11,585,690,928	696,300,025	-	(131,348,424)	-	12,150,642,529	-
	2129	12,150,642,529	730,253,616	-	(383,182,296)	-	12,497,713,848	-
	2130	12,497,713,848	751,112,602	-	(396,057,222)	-	12,852,769,229	-
	2131	12,852,769,229	772,451,431	-	(144,641,910)	-	13,480,578,750	-
	2132	13,480,578,750	810,182,783	-	(286,720,233)	-	14,004,041,300	-
	2133	14,004,041,300	841,642,882	-	(154,525,141)	-	14,691,159,040	-
	2134	14,691,159,040	882,938,658	-	(159,717,186)	-	15,414,380,513	-
	2135	15,414,380,513	926,404,269	-	(467,218,940)	-	15,873,565,842	-
	2136	15,873,565,842	954,001,307	-	(1,107,958,980)	-	15,719,608,169	-
	2137	15,719,608,169	944,748,451	-	(176,363,680)	-	16,487,992,940	-
	2138	16,487,992,940	990,928,376	-	(849,539,994)	-	16,629,381,322	-
	2139	16,629,381,322	999,425,817	-	(188,414,427)	-	17,440,392,713	-
	2140	17,440,392,713	1,048,167,602	-	(551,700,213)	-	17,936,860,102	-
	2141	17,936,860,102	1,078,005,292	-	(201,288,588)	-	18,813,576,805	-
	2142	18,813,576,805	1,130,695,966	-	(969,602,734)	-	18,974,670,037	-
	2143	18,974,670,037	1,140,377,669	-	(215,042,428)	-	19,900,005,278	-
	2144	19,900,005,278	1,195,990,317	-	(1,036,463,634)	-	20,059,531,961	-
	2145	20,059,531,961	1,205,577,871	-	(229,736,054)	-	21,035,373,778	-
	2146	21,035,373,778	1,264,225,964	-	(1,106,633,554)	-	21,192,966,188	-
	2147	21,192,966,188	1,273,697,268	-	(245,433,680)	-	22,221,229,777	-
	2148	22,221,229,777	1,335,495,910	-	(1,182,943,688)	-	22,373,781,998	-
	2149	22,373,781,998	1,344,664,298	-	(262,203,908)	-	23,456,242,388	-
	2150	23,456,242,388	1,409,720,168	-	(1,749,389,641)	-	23,116,572,915	-
	2151	23,116,572,915	1,389,306,032	-	(280,120,028)	-	24,225,758,919	-
	2152	24,225,758,919	1,455,968,111	-	(1,416,362,795)	-	24,265,364,236	-
	2153	24,265,364,236	1,458,348,391	-	(1,463,132,693)	-	24,260,579,933	-
	2154	24,260,579,933	1,458,060,854	-	(1,512,293,952)	-	24,206,346,835	-
	2155	24,206,346,835	1,454,801,445	-	(1,659,479,092)	-	24,001,669,188	-
	2156	24,001,669,188	1,442,500,318	-	(1,238,539,612)	-	24,205,629,894	-
	2157	24,205,629,894	1,454,758,357	-	(966,663,797)	-	24,693,724,453	-
	2158	24,693,724,453	1,484,092,840	-	(999,143,701)	-	25,178,673,592	-
	2159	25,178,673,592	1,513,238,283	-	(364,891,852)	-	26,327,020,023	-
	2160	26,327,020,023	1,582,253,903	-	(1,413,578,411)	-	26,495,695,515	-
	2161	26,495,695,515	1,592,391,300	-	(1,103,279,266)	-	26,984,807,549	-
	2162	26,984,807,549	1,621,786,934	-	(1,509,062,856)	-	27,097,531,627	-
	2163	27,097,531,627	1,628,561,651	-	(1,559,767,368)	-	27,166,325,910	-
	2164	27,166,325,910	1,632,696,187	-	(431,633,248)	-	28,367,388,849	-
	2165	28,367,388,849	1,704,880,070	-	(1,259,202,158)	-	28,813,066,761	-
	2166	28,813,066,761	1,731,665,312	-	(459,866,391)	-	30,084,865,682	-
	2167	30,084,865,682	1,808,100,427	-	(1,780,204,247)	-	30,112,761,862	-

Levelized (beginning of year payment, mid year interest)

EXTERNAL FUND CALCULATION

2168	30,112,761,862	1,809,776,988	-	(1,391,788,264)	-	30,530,750,587	-
2169	30,530,750,587	1,834,898,110	-	(507,795,880)	-	31,857,852,817	-
2170	31,857,852,817	1,914,656,954	-	(1,965,745,702)	-	31,806,764,070	-
2171	31,806,764,070	1,911,586,521	-	(1,535,360,853)	-	32,182,989,737	-
2172	32,182,989,737	1,934,197,683	-	(562,257,032)	-	33,554,930,389	-
2173	33,554,930,389	2,016,651,316	-	(1,640,270,463)	-	33,931,311,242	-
2174	33,931,311,242	2,039,271,806	-	(2,243,558,186)	-	33,727,024,861	-
2175	33,727,024,861	2,026,994,194	-	(619,161,832)	-	35,134,857,224	-
2176	35,134,857,224	2,111,604,919	-	(1,812,980,676)	-	35,433,481,467	-
2177	35,433,481,467	2,129,552,236	-	(2,477,392,619)	-	35,085,641,084	-
2178	35,085,641,084	2,108,647,029	-	(683,693,858)	-	36,510,594,255	-
2179	36,510,594,255	2,194,286,715	-	(2,000,002,177)	-	36,704,878,793	-
2180	36,704,878,793	2,205,963,215	-	(2,069,203,373)	-	36,841,638,635	-
2181	36,841,638,635	2,214,182,482	-	(754,951,723)	-	38,300,869,394	-
2182	38,300,869,394	2,301,882,251	-	(1,494,385,065)	-	39,108,366,579	-
2183	39,108,366,579	2,350,412,831	-	(806,536,789)	-	40,652,242,622	-
2184	40,652,242,622	2,443,199,782	-	(835,920,360)	-	42,259,522,043	-
2185	42,259,522,043	2,539,797,275	-	(2,438,627,530)	-	42,360,691,788	-
2186	42,360,691,788	2,545,877,576	-	(5,780,500,376)	-	39,126,068,988	-
2187	39,126,068,988	2,351,476,746	-	(920,522,025)	-	40,557,023,709	-
2188	40,557,023,709	2,437,477,125	-	(4,436,741,208)	-	38,557,759,626	-
2189	38,557,759,626	2,317,321,353	-	(983,420,338)	-	39,891,660,641	-
2190	39,891,660,641	2,397,488,805	-	(2,876,788,776)	-	39,412,360,670	-
2191	39,412,360,670	2,368,682,876	-	(998,196,069)	-	40,782,847,477	-
2192	40,782,847,477	2,451,049,133	-	(5,098,885,693)	-	38,135,010,918	-
2193	38,135,010,918	2,291,914,156	-	(1,159,105,399)	-	39,267,819,674	-
2194	39,267,819,674	2,359,995,962	-	(5,492,439,186)	-	36,135,376,450	-
2195	36,135,376,450	2,171,736,125	-	(1,550,239,339)	-	36,756,873,236	-
2196	36,756,873,236	2,209,088,082	-	(5,921,860,372)	-	33,044,100,946	-
2197	33,044,100,946	1,985,950,467	-	(1,270,015,450)	-	33,760,035,963	-
2198	33,760,035,963	2,028,978,161	-	(6,104,627,576)	-	29,684,386,548	-
2199	29,684,386,548	1,784,031,632	-	(1,413,311,630)	-	30,055,106,550	-
2200	30,055,106,550	1,806,311,904	-	(9,118,695,696)	-	22,742,722,758	-
2201	22,742,722,758	1,366,837,638	-	(1,509,881,744)	-	22,599,678,651	-
2202	22,599,678,651	1,358,240,687	-	(1,560,613,771)	-	22,397,305,567	-
2203	22,397,305,567	1,346,078,065	-	(1,613,050,393)	-	22,130,333,239	-
2204	22,130,333,239	1,330,033,028	-	(1,604,413,920)	-	21,855,952,347	-
2205	21,855,952,347	1,313,542,736	-	(1,723,268,449)	-	21,446,226,634	-
2206	21,446,226,634	1,288,918,221	-	(1,781,170,269)	-	20,953,974,585	-
2207	20,953,974,585	1,259,333,873	-	(1,767,396,582)	-	20,445,911,876	-
2208	20,445,911,876	1,228,799,304	-	(1,907,255,225)	-	19,767,455,954	-
2209	19,767,455,954	1,188,024,103	-	(1,966,812,407)	-	18,988,667,650	-
2210	18,988,667,650	1,141,218,926	-	(1,951,603,160)	-	18,178,283,415	-
2211	18,178,283,415	1,092,514,833	-	(2,101,202,654)	-	17,169,595,595	-
2212	17,169,595,595	1,031,892,695	-	(2,176,801,440)	-	16,024,686,850	-
2213	16,024,686,850	963,083,680	-	(2,155,008,635)	-	14,832,761,895	-
2214	14,832,761,895	891,448,990	-	(2,320,200,107)	-	13,404,010,777	-
2215	13,404,010,777	805,581,048	-	(2,398,158,831)	-	11,811,432,994	-
2216	11,811,432,994	709,867,123	-	(2,385,318,788)	-	10,135,981,329	-
2217	10,135,981,329	609,172,478	-	(9,191,681,539)	-	1,553,472,267	-
2218	1,553,472,267	93,363,683	-	(1,646,835,951)	-	(0)	-

Levelized (beginning of year payment, mid year interest)

EXTERNAL FUND CALCULATION

Prairie Island Unit 2

	Beginning Balance	Assumed Interest	Annuity Transfer	Decommissioning Payment	Annuity	Ending Balance	Book Expense
2014	\$406,406,407	\$11,257,457	-	-	-	\$417,663,864	
2015	417,663,864	23,164,959	-	-	952,368	441,781,191	952,368
2016	441,781,191	28,322,735	-	-	8,492,272	478,596,198	8,492,272
2017	478,596,198	30,660,488	-	-	8,492,272	517,748,959	8,492,272
2018	517,748,959	33,146,689	-	-	8,492,272	559,387,920	8,492,272
2019	559,387,920	35,790,763	-	-	8,492,272	603,670,955	8,492,272
2020	603,670,955	38,602,735	-	-	8,492,272	650,765,963	8,492,272
2021	650,765,963	41,593,268	-	-	8,492,272	700,851,503	8,492,272
2022	700,851,503	44,773,700	-	-	8,492,272	754,117,476	8,492,272
2023	754,117,476	48,156,089	-	-	8,492,272	810,765,837	8,492,272
2024	810,765,837	51,753,260	-	-	8,492,272	871,011,370	8,492,272
2025	871,011,370	55,578,852	-	-	8,492,272	935,082,494	8,492,272
2026	935,082,494	59,647,368	-	-	8,492,272	1,003,222,134	8,492,272
2027	1,003,222,134	63,974,235	-	-	8,492,272	1,075,688,642	8,492,272
2028	1,075,688,642	68,575,858	-	-	8,492,272	1,152,756,773	8,492,272
2029	1,152,756,773	73,469,685	-	-	8,492,272	1,234,718,730	8,492,272
2030	1,234,718,730	78,674,269	-	-	8,492,272	1,321,885,271	8,492,272
2031	1,321,885,271	84,209,344	-	-	8,492,272	1,414,586,888	8,492,272
2032	1,414,586,888	90,095,897	-	-	8,492,272	1,513,175,057	8,492,272
2033	1,513,175,057	96,356,246	-	-	8,492,272	1,618,023,575	8,492,272
2034	1,618,023,575	96,312,377	-	(22,802,008)	6,793,818	1,698,327,762	6,793,818
2035	1,698,327,762	100,880,669	-	(143,943,658)	-	1,655,264,773	-
2036	1,655,264,773	98,322,728	-	(232,733,095)	-	1,520,854,405	-
2037	1,520,854,405	90,338,752	-	(234,243,574)	-	1,376,949,583	-
2038	1,376,949,583	81,790,805	-	(206,417,131)	-	1,252,323,257	-
2039	1,252,323,257	74,388,001	-	(60,326,347)	-	1,266,384,912	-
2040	1,266,384,912	75,223,264	-	(35,640,136)	-	1,305,968,040	-
2041	1,305,968,040	77,574,502	-	(68,401,151)	-	1,315,141,390	-
2042	1,315,141,390	78,119,399	-	(38,709,653)	-	1,354,551,136	-
2043	1,354,551,136	80,460,337	-	(74,495,760)	-	1,360,515,714	-
2044	1,360,515,714	80,814,633	-	(42,274,223)	-	1,399,056,124	-
2045	1,399,056,124	83,103,934	-	(81,133,403)	-	1,401,026,654	-
2046	1,401,026,654	83,220,983	-	(45,915,102)	-	1,438,332,535	-
2047	1,438,332,535	85,436,953	-	(88,362,467)	-	1,435,407,020	-
2048	1,435,407,020	85,263,177	-	(50,143,185)	-	1,470,527,012	-
2049	1,470,527,012	87,349,305	-	(138,209,496)	-	1,419,666,820	-
2050	1,419,666,820	84,328,209	-	(150,679,986)	-	1,353,315,043	-
2051	1,353,315,043	80,386,914	-	(127,024,830)	-	1,306,677,127	-
2052	1,306,677,127	77,616,621	-	(136,264,875)	-	1,248,028,872	-
2053	1,248,028,872	74,132,915	-	(109,994,306)	-	1,212,167,481	-
2054	1,212,167,481	72,002,748	-	(55,511,907)	-	1,228,658,322	-
2055	1,228,658,322	72,982,304	-	(57,377,108)	-	1,244,263,519	-
2056	1,244,263,519	73,909,253	-	(45,463,183)	-	1,272,709,589	-
2057	1,272,709,589	75,598,950	-	(35,483,413)	-	1,312,825,126	-
2058	1,312,825,126	77,981,812	-	(36,675,656)	-	1,354,131,282	-
2059	1,354,131,282	80,435,398	-	(13,394,117)	-	1,421,172,563	-
2060	1,421,172,563	84,417,650	-	(51,888,347)	-	1,453,701,866	-

Levelized (beginning of year payment, mid year interest)

EXTERNAL FUND CALCULATION

2061	1,453,701,866	86,349,891	-	(40,498,169)	-	1,499,553,587	-
2062	1,499,553,587	89,073,483	-	(55,393,303)	-	1,533,233,767	-
2063	1,533,233,767	91,074,086	-	(57,254,518)	-	1,567,053,335	-
2064	1,567,053,335	93,082,968	-	(15,844,000)	-	1,644,292,303	-
2065	1,644,292,303	97,670,963	-	(46,221,645)	-	1,695,741,621	-
2066	1,695,741,621	100,727,052	-	(16,880,356)	-	1,779,588,317	-
2067	1,779,588,317	105,707,546	-	(65,346,114)	-	1,819,949,749	-
2068	1,819,949,749	108,105,015	-	(51,088,494)	-	1,876,966,270	-
2069	1,876,966,270	111,491,796	-	(18,639,708)	-	1,969,818,358	-
2070	1,969,818,358	117,007,210	-	(72,156,801)	-	2,014,668,768	-
2071	2,014,668,768	119,671,325	-	(56,358,626)	-	2,077,981,466	-
2072	2,077,981,466	123,432,099	-	(20,638,818)	-	2,180,774,747	-
2073	2,180,774,747	129,538,020	-	(60,209,553)	-	2,250,103,214	-
2074	2,250,103,214	133,656,131	-	(82,354,488)	-	2,301,404,857	-
2075	2,301,404,857	136,703,449	-	(29,578,583)	-	2,408,529,723	-
2076	2,408,529,723	143,066,666	-	(66,549,242)	-	2,485,047,147	-
2077	2,485,047,147	147,611,801	-	(90,937,869)	-	2,541,721,078	-
2078	2,541,721,078	150,978,232	-	(25,096,411)	-	2,667,602,899	-
2079	2,667,602,899	158,455,612	-	(73,414,256)	-	2,752,644,255	-
2080	2,752,644,255	163,507,069	-	(75,954,431)	-	2,840,196,893	-
2081	2,840,196,893	168,707,695	-	(27,712,079)	-	2,981,192,509	-
2082	2,981,192,509	177,082,835	-	(54,854,524)	-	3,103,420,820	-
2083	3,103,420,820	184,343,197	-	(29,605,617)	-	3,258,158,400	-
2084	3,258,158,400	193,534,609	-	(30,684,202)	-	3,421,008,806	-
2085	3,421,008,806	203,207,923	-	(89,514,916)	-	3,534,701,814	-
2086	3,534,701,814	209,961,288	-	(212,185,337)	-	3,532,477,765	-
2087	3,532,477,765	209,829,179	-	(33,789,683)	-	3,708,517,261	-
2088	3,708,517,261	220,285,925	-	(162,859,851)	-	3,765,943,335	-
2089	3,765,943,335	223,697,034	-	(36,098,497)	-	3,953,541,872	-
2090	3,953,541,872	234,840,387	-	(105,598,539)	-	4,082,783,720	-
2091	4,082,783,720	242,517,353	-	(38,565,070)	-	4,286,736,004	-
2092	4,286,736,004	254,632,119	-	(185,876,307)	-	4,355,491,815	-
2093	4,355,491,815	258,716,214	-	(41,200,181)	-	4,573,007,848	-
2094	4,573,007,848	271,636,666	-	(198,460,372)	-	4,646,184,143	-
2095	4,646,184,143	275,983,338	-	(44,015,346)	-	4,878,152,134	-
2096	4,878,152,134	289,762,237	-	(212,145,604)	-	4,955,768,767	-
2097	4,955,768,767	294,372,665	-	(47,022,869)	-	5,203,118,562	-
2098	5,203,118,562	309,065,243	-	(226,508,134)	-	5,285,675,671	-
2099	5,285,675,671	313,969,135	-	(50,235,893)	-	5,549,408,913	-
2100	5,549,408,913	329,634,889	-	(335,167,205)	-	5,543,876,597	-
2101	5,543,876,597	329,306,270	-	(53,668,459)	-	5,819,514,407	-
2102	5,819,514,407	345,679,156	-	(271,210,301)	-	5,893,983,262	-
2103	5,893,983,262	350,102,606	-	(280,322,968)	-	5,963,762,900	-
2104	5,963,762,900	354,247,516	-	(289,904,181)	-	6,028,106,235	-
2105	6,028,106,235	358,069,510	-	(299,477,144)	-	6,086,698,601	-
2106	6,086,698,601	361,549,897	-	(237,119,512)	-	6,211,128,986	-
2107	6,211,128,986	368,941,062	-	(185,204,025)	-	6,394,866,022	-
2108	6,394,866,022	379,855,042	-	(191,612,188)	-	6,583,108,875	-
2109	6,583,108,875	391,036,667	-	(69,909,973)	-	6,904,235,570	-
2110	6,904,235,570	410,111,593	-	(270,630,846)	-	7,043,716,316	-
2111	7,043,716,316	418,396,749	-	(211,378,311)	-	7,250,734,754	-
2112	7,250,734,754	430,693,644	-	(289,334,267)	-	7,392,094,131	-
2113	7,392,094,131	439,090,391	-	(298,837,296)	-	7,532,347,227	-

levelized

Levelized (beginning of year payment, mid year interest)

EXTERNAL FUND CALCULATION

External Lev										
	2114	7,532,347,227	447,421,425	-	(82,471,071)	-	7,897,297,581	-		
	2115	7,897,297,581	469,099,476	-	(266,946,873)	-	8,099,450,184	-		
	2116	8,099,450,184	481,107,341	-	(88,347,621)	-	8,492,209,904	-		
	2117	8,492,209,904	504,437,268	-	(341,071,004)	-	8,655,576,167	-		
	2118	8,655,576,167	514,141,224	-	(266,396,141)	-	8,903,321,251	-		
	2119	8,903,321,251	528,857,282	-	(97,289,090)	-	9,334,889,444	-		
	2120	9,334,889,444	554,492,433	-	(376,894,568)	-	9,512,487,309	-		
	2121	9,512,487,309	565,041,746	-	(294,161,229)	-	9,783,367,827	-		
	2122	9,783,367,827	581,132,049	-	(107,429,027)	-	10,257,070,849	-		
	2123	10,257,070,849	609,270,008	-	(314,260,959)	-	10,552,079,898	-		
	2124	10,552,079,898	626,793,546	-	(430,159,858)	-	10,748,713,586	-		
	2125	10,748,713,586	638,473,587	-	(118,625,797)	-	11,268,561,375	-		
	2126	11,268,561,375	669,352,546	-	(347,014,749)	-	11,590,899,172	-		
	2127	11,590,899,172	688,499,411	-	(474,645,980)	-	11,804,752,603	-		
	2128	11,804,752,603	701,202,305	-	(131,348,424)	-	12,374,606,483	-		
	2129	12,374,606,483	735,051,625	-	(383,182,296)	-	12,726,475,812	-		
	2130	12,726,475,812	755,952,663	-	(396,057,222)	-	13,086,371,254	-		
	2131	13,086,371,254	777,330,452	-	(144,641,910)	-	13,719,059,796	-		
	2132	13,719,059,796	814,912,152	-	(286,720,233)	-	14,247,251,715	-		
	2133	14,247,251,715	846,286,752	-	(154,525,141)	-	14,939,013,326	-		
	2134	14,939,013,326	887,377,392	-	(159,717,186)	-	15,666,673,531	-		
	2135	15,666,673,531	930,600,408	-	(467,218,940)	-	16,130,054,999	-		
	2136	16,130,054,999	958,125,267	-	(1,107,958,980)	-	15,980,221,286	-		
	2137	15,980,221,286	949,225,144	-	(176,363,680)	-	16,753,082,751	-		
	2138	16,753,082,751	995,133,115	-	(849,539,994)	-	16,898,675,872	-		
	2139	16,898,675,872	1,003,781,347	-	(188,414,427)	-	17,714,042,793	-		
	2140	17,714,042,793	1,052,214,142	-	(551,700,213)	-	18,214,556,721	-		
	2141	18,214,556,721	1,081,944,669	-	(201,288,588)	-	19,095,212,802	-		
	2142	19,095,212,802	1,134,255,640	-	(969,602,734)	-	19,259,865,708	-		
	2143	19,259,865,708	1,144,036,023	-	(215,042,428)	-	20,188,859,303	-		
	2144	20,188,859,303	1,199,218,243	-	(1,036,463,634)	-	20,351,613,911	-		
	2145	20,351,613,911	1,208,885,866	-	(229,736,054)	-	21,330,763,724	-		
	2146	21,330,763,724	1,267,047,365	-	(1,106,633,554)	-	21,491,177,535	-		
	2147	21,491,177,535	1,276,575,946	-	(245,433,680)	-	22,522,319,801	-		
	2148	22,522,319,801	1,337,825,796	-	(1,182,943,688)	-	22,677,201,909	-		
	2149	22,677,201,909	1,347,025,793	-	(262,203,908)	-	23,762,023,795	-		
	2150	23,762,023,795	1,411,464,213	-	(1,749,389,641)	-	23,424,098,367	-		
	2151	23,424,098,367	1,391,391,443	-	(280,120,028)	-	24,535,369,782	-		
	2152	24,535,369,782	1,457,400,965	-	(1,416,362,795)	-	24,576,407,953	-		
	2153	24,576,407,953	1,459,838,632	-	(1,463,132,693)	-	24,573,113,892	-		
	2154	24,573,113,892	1,459,642,965	-	(1,512,293,952)	-	24,520,462,906	-		
	2155	24,520,462,906	1,456,515,497	-	(1,659,479,092)	-	24,317,499,310	-		
	2156	24,317,499,310	1,444,459,459	-	(1,238,539,612)	-	24,523,419,157	-		
	2157	24,523,419,157	1,456,691,098	-	(966,663,797)	-	25,013,446,458	-		
	2158	25,013,446,458	1,485,798,720	-	(999,143,701)	-	25,500,101,476	-		
	2159	25,500,101,476	1,514,706,028	-	(364,891,852)	-	26,649,915,651	-		
	2160	26,649,915,651	1,583,004,990	-	(1,413,578,411)	-	26,819,342,230	-		
	2161	26,819,342,230	1,593,068,928	-	(1,103,279,266)	-	27,309,131,892	-		
	2162	27,309,131,892	1,622,162,434	-	(1,509,062,856)	-	27,422,231,471	-		
	2163	27,422,231,471	1,628,880,549	-	(1,559,767,368)	-	27,491,344,652	-		
	2164	27,491,344,652	1,632,985,872	-	(431,633,248)	-	28,692,697,276	-		
	2165	28,692,697,276	1,704,346,218	-	(1,259,202,158)	-	29,137,841,337	-		
	2166	29,137,841,337	1,730,787,775	-	(459,866,391)	-	30,408,762,721	-		

Levelized (beginning of year payment, mid year interest)

EXTERNAL FUND CALCULATION

2167	30,408,762,721	1,806,280,506	-	(1,780,204,247)	-	30,434,838,980	-
2168	30,434,838,980	1,807,829,435	-	(1,391,788,264)	-	30,850,880,151	-
2169	30,850,880,151	1,832,542,281	-	(507,795,880)	-	32,175,626,553	-
2170	32,175,626,553	1,911,232,217	-	(1,965,745,702)	-	32,121,113,068	-
2171	32,121,113,068	1,907,994,116	-	(1,535,360,853)	-	32,493,746,331	-
2172	32,493,746,331	1,930,128,532	-	(562,257,032)	-	33,861,617,832	-
2173	33,861,617,832	2,011,380,099	-	(1,640,270,463)	-	34,232,727,468	-
2174	34,232,727,468	2,033,424,012	-	(2,243,558,186)	-	34,022,593,293	-
2175	34,022,593,293	2,020,942,042	-	(619,161,832)	-	35,424,373,503	-
2176	35,424,373,503	2,104,207,786	-	(1,812,980,676)	-	35,715,600,612	-
2177	35,715,600,612	2,121,506,676	-	(2,477,392,619)	-	35,359,714,670	-
2178	35,359,714,670	2,100,367,051	-	(683,693,858)	-	36,776,387,863	-
2179	36,776,387,863	2,184,517,439	-	(2,000,002,177)	-	36,960,903,125	-
2180	36,960,903,125	2,195,477,646	-	(2,069,203,373)	-	37,087,177,398	-
2181	37,087,177,398	2,202,978,337	-	(754,951,723)	-	38,535,204,012	-
2182	38,535,204,012	2,288,991,118	-	(1,494,385,065)	-	39,329,810,065	-
2183	39,329,810,065	2,336,190,718	-	(806,536,789)	-	40,859,463,994	-
2184	40,859,463,994	2,427,052,161	-	(835,920,360)	-	42,450,595,795	-
2185	42,450,595,795	2,521,565,390	-	(2,438,627,530)	-	42,533,533,655	-
2186	42,533,533,655	2,526,491,899	-	(5,780,500,376)	-	39,279,525,179	-
2187	39,279,525,179	2,333,203,796	-	(920,522,025)	-	40,692,206,949	-
2188	40,692,206,949	2,417,117,093	-	(4,436,741,208)	-	38,672,582,833	-
2189	38,672,582,833	2,297,151,420	-	(983,420,338)	-	39,986,313,916	-
2190	39,986,313,916	2,375,187,047	-	(2,876,788,776)	-	39,484,712,186	-
2191	39,484,712,186	2,345,391,904	-	(998,196,078)	-	40,831,908,012	-
2192	40,831,908,012	2,425,415,336	-	(5,098,885,703)	-	38,158,437,645	-
2193	38,158,437,645	2,266,611,196	-	(1,159,105,410)	-	39,265,943,431	-
2194	39,265,943,431	2,332,397,040	-	(5,492,439,197)	-	36,105,901,274	-
2195	36,105,901,274	2,144,690,536	-	(1,550,239,350)	-	36,700,352,460	-
2196	36,700,352,460	2,180,000,936	-	(5,921,860,383)	-	32,958,493,013	-
2197	32,958,493,013	1,957,734,485	-	(1,270,015,462)	-	33,646,212,037	-
2198	33,646,212,037	1,998,584,995	-	(6,104,627,588)	-	29,540,169,444	-
2199	29,540,169,444	1,754,686,065	-	(1,413,311,643)	-	29,881,543,866	-
2200	29,881,543,866	1,774,963,706	-	(9,118,695,709)	-	22,537,811,863	-
2201	22,537,811,863	1,338,746,025	-	(1,509,881,757)	-	22,366,676,131	-
2202	22,366,676,131	1,328,580,562	-	(1,560,613,784)	-	22,134,642,908	-
2203	22,134,642,908	1,314,797,789	-	(1,613,050,408)	-	21,836,390,289	-
2204	21,836,390,289	1,297,081,583	-	(1,604,413,934)	-	21,529,057,938	-
2205	21,529,057,938	1,278,826,042	-	(1,723,268,464)	-	21,084,615,516	-
2206	21,084,615,516	1,252,426,162	-	(1,781,170,285)	-	20,555,871,393	-
2207	20,555,871,393	1,221,018,761	-	(1,767,396,598)	-	20,009,493,555	-
2208	20,009,493,555	1,188,563,917	-	(1,907,255,242)	-	19,290,802,230	-
2209	19,290,802,230	1,145,873,652	-	(1,966,812,425)	-	18,469,863,458	-
2210	18,469,863,458	1,097,109,889	-	(1,951,603,178)	-	17,615,370,169	-
2211	17,615,370,169	1,046,352,988	-	(2,101,202,672)	-	16,560,520,485	-
2212	16,560,520,485	983,694,917	-	(2,176,801,459)	-	15,367,413,943	-
2213	15,367,413,943	912,824,388	-	(2,155,008,655)	-	14,125,229,676	-
2214	14,125,229,676	839,038,643	-	(2,320,200,128)	-	12,644,068,191	-
2215	12,644,068,191	751,057,651	-	(2,398,158,852)	-	10,996,966,989	-
2216	10,996,966,989	653,219,839	-	(2,385,318,810)	-	9,264,868,018	-
2217	9,264,868,018	550,333,160	-	(8,368,145,667)	-	1,447,055,512	-
2218	1,447,055,512	85,955,097	-	(1,533,010,609)	-	0	-

Decommissioning Filings

Year of Filing	Docket No.	Date of Filing	Start Date of Accrual	End Date of Accrual	Accrual Amount
2005	E002/M-05-1648	10/11/2005	1/1/2006	12/31/2008	\$32,016,646
2008	E002/M-08-1201	10/13/2008	1/1/2009	12/31/2011	-
2011	E002/M-11-939	12/30/2011	1/1/2012	12/31/2012	-
			1/1/2013	12/31/2014	14,189,132
2014	E002/M-14-761 (pending)	12/1/2014	1/1/2015	12/31/2015	14,189,132
			1/1/2016	12/31/2018	14,030,831

Rate Cases

Year of Filing	Docket No.	Test Year	Recovery Amount	Recovery Amount
2005	E002/GR-05-1428	2006	\$32,017,000	\$32,017,000
2008	E002/GR-08-1065	2009	-	-
2010	E002/GR-10-971	2011	-	-
2012	E002/GR-12-961	2013	-	-
2013	E002/GR-13-868 (pending)	2014/2015	-	-

Nuclear Decommissioning Rate Impact Calculation

2016 Accrual Amount						
36-Year Scenario						\$10,413,729
60-Year Scenario						\$14,030,831
100-Year Scenario						\$35,541,564
200-Year Scenario						\$42,315,825
Analysis by Customer Class		Residential	C&I Non-Demand	C&I Demand	Lighting	Total
Stratification ⁽¹⁾						
Capacity Component (D10S)	20.9%	34.52%	3.68%	61.80%	0.00%	100.00%
Energy Component (E8760)	79.1%	28.91%	3.29%	67.37%	0.43%	100.00%
Combined		30.08%	3.37%	66.21%	0.34%	100.00%
Combined Allocation to Class						
36-Year Scenario		\$3,132,666	\$350,731	\$6,894,553	\$35,780	\$10,413,729
60-Year Scenario		\$4,220,765	\$472,554	\$9,289,305	\$48,208	\$14,030,831
100-Year Scenario		\$10,691,641	\$1,197,028	\$23,530,781	\$122,115	\$35,541,564
200-Year Scenario		\$12,729,479	\$1,425,183	\$28,015,773	\$145,390	\$42,315,825
Class MWh Sales ⁽²⁾		8,507,873	931,144	21,481,592	174,524	31,095,133
Average Class Amount per kWh						
36-Year Scenario		\$0.000368	\$0.000377	\$0.000321	\$0.000205	
60-Year Scenario		\$0.000496	\$0.000507	\$0.000432	\$0.000276	
100-Year Scenario		\$0.001257	\$0.001286	\$0.001095	\$0.000700	
200-Year Scenario		\$0.001496	\$0.001531	\$0.001304	\$0.000833	
Average Customer Monthly kWh ⁽³⁾		642	900	38,237	1,722	
Average Customer Monthly Amount						
36-Year Scenario		\$0.24	\$0.34	\$12.27	\$0.35	
60-Year Scenario		\$0.32	\$0.46	\$16.52	\$0.48	
100-Year Scenario		\$0.81	\$1.16	\$41.87	\$1.21	
200-Year Scenario		\$0.96	\$1.38	\$49.86	\$1.43	

(1) Docket No. E002/GR-13-868, Nuclear Stratification Percentages (Peppin Testimony, Table 5) (Peppin Testimony, Schedule 4, Pages 13-14)

(2) Year Ending June 2014

(3) Docket No. E002/GR-13-868, Sales by Rate Schedule (Lighting based on Metered Service) (Huso Rebuttal Testimony, Schedule 7)

End-of-life nuclear fuel refers to the book recovery of unused nuclear fuel at the time of reactor shutdown. The unit of production method assures full recovery. However, the Company does not want a dramatic increase in recovery in the final period. To combat this possibility, the increase over usual depreciation levels was isolated and a sinking fund method was established to spread this amount over the remaining life of the nuclear units. The Company received approval from the Commission to recover for end-of-life nuclear fuel.¹

At the end of the final period or the last cycle, each reactor unit will contain fuel that is partially burned and fuel that is fully burned. Normally, the partially burned fuel would have been recovered in future periods, but without those future periods, the unit of production method takes the remaining depreciation in the last several cycles prior to permanent shutdown causing a spike in expense rates. To eliminate this spike, the remaining recovery associated with the partially burned fuel becomes the amount to recover over the remaining life of the plant, using the sinking fund method.

Before quantifying this spike through the use of in-house plant specific core design models, fuel management strategies to minimize the amount of unburned fuel in each reactor at end of licensed life were developed. As the reactors at Prairie Island and Monticello approach their end of licensed life, a spike in fuel expense is indicated since all useful energy in the fuel will not be recovered. By minimizing the amount of useful energy remaining in the fuel at end of licensed life, the spikes in fuel expense rate in the last several cycles of operation are lowered, thereby reducing the overall dollar amount to be recovered prior to permanent shutdown.

The strategy for Prairie Island Unit 1 and Unit 2 uses the ability to interchange fuel between the two reactors and the re-insertion of fuel burned from previous cycles. In this end of licensed life study, the last cycle of Unit 1 (Cycle 39 with an August 9, 2033 shutdown) utilizes only 16 fresh assemblies. This is in contrast to 24 fresh assemblies from the previous end of licensed life study. The last cycle for Unit 2 (Cycle 39 with an October 29, 2034 shutdown) utilizes 49 burned assemblies discharged from Unit 1 that contained the most useful remaining energy. Reusing these burned assemblies from Unit 1 permits more energy to be extracted from these assemblies resulting in reduced end of life expense. Moreover, it eliminates the need to purchase a large number of fresh fuel assemblies for the final cycle of Unit 2. In fact, in this end of licensed life study, only eight fresh assemblies are loaded in the last cycle of Unit 2

¹ The Commission's Order received on February 25, 1992, MPUC Docket No. E002/D-90-184, Triennial Review of Nuclear Decommissioning.

based on operational considerations. This significantly reduces the end of licensed life cost for the combined Prairie Island units.

Monticello is on a two-year operating cycle and is being uprated from its current thermal capacity of 1,775 megawatt thermal (MWth) to 2,004 MWth during 2014. These operating conditions will result in typical cycle lengths ranging from approximately 14,500 to 16,500 megawatt days per metric ton of uranium (MWd/MTU) and will require between 152-164 fresh fuel assemblies to be loaded into the core each new cycle. Due to operational factors associated with the two-year cycle lengths, the current end of licensed life study for Monticello does not utilize the reinsertion scheme employed like Prairie Island to reduce the number of fresh assemblies in the final cycle. The multi-cycle Monticello fuel management strategy in this end of licensed life study loads only 100 fresh assemblies into Monticello's final cycle (Cycle 35 with September 8, 2030 shutdown) compared with 112 in the previous filing. Cycle 35 has a shortened cycle length requirement of about 10,440 MWd/MTU. In addition to the shorter cycle length for the last cycle, the lower fresh fuel loading of 100 assemblies in the last cycle results in about 83 days of gradual power coast down at the end of cycle to about 73 percent in order to minimize the fresh fuel reload costs.

Because the strategy is to manage the fuel for the entire station at Prairie Island as indicated by the plan to re-insert partially burned fuel from Unit 1 into Unit 2, only one net figure is shown for the Prairie Island Station. The result of this analysis produced the following future amounts to be recovered:

Amount to Be Recovered	
Monticello	\$73,999,696
Prairie Island	53,047,873
	\$127,047,569

The above amounts represent the total cost cost to be recovered and do not take into account the amounts already collected to date as part of historic actual monthly nuclear fuel expense rates. This projected recovery of \$127 million compares to \$155 million in the 2011 filing. For the most part, this \$28 million decrease in the amount to recover is brought about by the following factors:

- *Improved fuel utilization in the updated multi-cycle core designs close to EOLL*
- *Lower projected nuclear fuel commodity prices throughout the forecast period*

The internal rate of return and the remaining life are the same as was used for decommissioning and carry the same stipulations.

Therefore, the calculation of the proposed 2016 accrual produced a decrease of \$505,514 over the present accrual.² This number represents the decrease in accrual. The Company requests an annual accrual for EOL nuclear fuel of \$2,020,602 for the MN Jurisdiction.

Schedule J contains the accrual worksheets supporting the end-of-life nuclear fuel numbers in the main document, which are listed in the table below.

EOL Nuclear Fuel Supporting Schedules

J.1	Present to Proposed Accrual Comparison
J.2	2016 EOL Nuclear Fuel Accrual (Proposed)
J.3	2016 EOL Nuclear Fuel Accrual (Present)

² The 2016 accrual sheet as last ordered is included in Schedule J.3. The proposed accrual sheet is in Schedule J.2.

	Present	Proposed	Difference
EXTERNAL FUND			
Monticello	\$2,234,304	\$1,889,868	(\$344,436)
Prairie Island	1,163,760	828,192	(335,568)
TOTAL (Total Company)	\$3,398,064	\$2,718,060	(\$680,004)
Minnesota Jurisdiction Factor	74.3399%	74.3399%	74.3399%
TOTAL (Minnesota Jurisdiction)	\$2,526,116	\$2,020,602	(\$505,514)

Proposed Assumptions

ANNUAL ACCRUAL

Generating Plant	Sinking Fund Rate	Remaining Life 1/1/16	Amount to Recover	Amount Recovered	Annual Accrual
	(1)	(2)	(3)	(4)	(5)
Monticello	6.51%	14.75	\$73,999,696	\$29,444,047	\$1,889,868
Prairie Island	6.51%	18.30	53,047,873	25,433,209	828,192
			\$127,047,569	\$54,877,256	\$2,718,060

INPUT DATA

Tax Rate	41.37% (a)		
Rate of Return - Internal			
	<u>Percent</u>	<u>Cost</u>	<u>Weight</u>
Short-Term	2.14	0.68	0.01
Long-Term	45.30	5.02	2.27
Total Debt	47.44		2.28 (c)
Preferred	0.00	0.00	0.00
Common	52.56	9.83	5.17
Total	100.00		7.45 (d)
After-Tax Rate	6.51% (e)		

NOTES

Input Data

(e) = (d) - [(c) x (a)]

(2) = Remaining life based on E,G002/D-14-181

(3) = Final Core Analysis from 2014 filing

Annual Accrual

(5) = {[(3) - (4)] x (1) } / { [(1 + (1)) ^ (2)] - 1 }

Current Assumptions

ANNUAL ACCRUAL

Generating Plant	Sinking Fund Rate	Remaining Life 1/1/16	Amount to Recover	Amount Recovered	Annual Accrual
	(1)	(2)	(3)	(4)	(5)
Monticello	7.54%	14.75	\$86,390,356	\$29,444,047	\$2,234,304
Prairie Island	7.54%	18.30	68,370,332	25,433,209	1,163,760
			\$154,760,688	\$54,877,256	\$3,398,064

INPUT DATA

Tax Rate	41.37% (a)		
Rate of Return - Internal			
	<u>Percent</u>	<u>Cost</u>	<u>Weight</u>
Short-Term	1.28	4.41	0.06
Long-Term	46.25	6.61	3.06
Total Debt	47.53		3.12 (c)
Preferred	0.00	0.00	0.00
Common	52.47	10.88	5.71
Total	100.00		8.83 (d)
After-Tax Rate	7.54% (e)		

NOTES

Input Data

(e) = (d) - [(c) x (a)]

(2) = Remaining life based on E,G002/D-14-181

(3) = Final Core Analysis from 2011 filing

Annual Accrual

(5) = {[(3) - (4)] x (1) } / { [(1 + (1)) ^ (2)] - 1 }

An important issue that needs to be considered for nuclear plants is premature decommissioning of nuclear generating facilities, which can be either accident or non-accident related. Presently, insurance is unavailable for non-accident related premature decommissioning such as those caused by regulatory directives. Therefore, the insurance analysis deals with accident related premature decommissioning.

The Company has insurance for accident-related premature decommissioning, covering property, liability, and replacement energy costs. In 1981, an internal sinking fund for the accrual of nuclear decommissioning costs was established. In 1990, an external fund was also created. In 2005, all internal funds were transferred to external funds. Further, in 2006 the Company established an external escrow fund. Amounts have been accumulating in these funds and would apply to all premature decommissioning expenses. The total fund accumulation as of June 30, 2014, for the Minnesota Jurisdiction is approximately \$961 million for the qualified trust fund and \$117 million for the escrow fund.

Availability of Insurance

In the event of an accident-related premature decommissioning, the Company's property insurance coverage would apply to any resulting property damage and the cost of site decontamination and clean up. Insurance coverage for public liability and business interruption would also apply, if necessary. Marsh USA, a commercial nuclear insurance broker, is also the Company's insurance consultant and assists in providing the proper insurance coverage.

Property Insurance

The Company maintains property insurance in the amount of \$2.25 billion per site. The insurance is currently provided by Nuclear Electric Insurance Limited (NEIL) in the form of two insurance policies per site. These insurance policies cover property damage to the Company's nuclear facilities plus site decontamination clean up caused by an accident.

The primary policy provides coverage limits of \$1.5 billion per site; the excess policy provides an additional \$750 million of insurance limits on a combined basis. There is a \$5 million deductible per loss that would have to be satisfied. NEIL, a mutual insurance company owned by the insured utilities, including the Company, initiated a program in November 1981 to offer additional nuclear

property insurance for each site. After receiving the approval of the Commission in Docket No. E002/M-81-560, the Company purchased \$118 million of NEIL nuclear property insurance.

Public Liability Insurance

The Price-Anderson liability provisions of the Atomic Energy Act of 1954 (Act) previously set a limit of \$640 million for public liability claims that could arise from a nuclear incident. In August 1988, an extension of the Act was signed continuing the provision for another 15 years and increasing the liability limits. In August 2005, an additional 20 year extension of the Act was signed into law. The Company purchases the maximum available private insurance of \$375 million to satisfy requirements under the Act. Claims above \$375 million up to \$12.985 billion would be satisfied by a NRC assessment against all owners of licensed nuclear generating units.

In the event of such an assessment by the NRC in response to an accident, the Company could be charged up to \$121.255 million per accident for each of its three licensed nuclear reactors but limited to a maximum cash payment of \$19.0 million per reactor per accident for any one year. The following is a breakdown of the coverage provided by the Act.

Price Anderson Act	
Liability Coverage (Millions)	
Private Insurance	\$375
NRC Assessment	12,610
	\$12,985 Per accident
NRC Assessment (Millions)	
Per Unit Assessment	\$121.255
No. Of Nuclear Units	X 104
Total Assessment	
	\$12,610

Accidental Outage Insurance

The Company purchases insurance to offset the potential additional outage-related expenses that would follow an accident at its nuclear generating plants.

The cost of replacement energy is included in this coverage. NEIL has provided this coverage since September 15, 1980.

NEIL accidental outage insurance provides coverage for a period of two years and forty-six and three-tenths (46.3) weeks following a 12-week waiting period deductible. Accidental outage insurance coverage amounts for the first 52 weeks are \$3.75 million, per week, for each unit at Prairie Island and Monticello, respectively. Thereafter, payments would be reduced by 20 percent for another 98.3 weeks, at which time the coverage would be exhausted.

In the event of an accident at Prairie Island that causes outages at both units, accidental outage insurance payments for each unit would be 80 percent of the amount payable had the outage affected only one unit.

Accidental Outage Insurance			
	Monticello	Prairie Island Unit 1	Prairie Island Unit 2
Deductible (weeks)	12	12	12
Coverage Dollar Amount (millions)*			
First Year	\$3.75	\$3.75	\$3.75
Second Year	\$3.0	\$3.0	\$3.0
Last 46.3 Weeks	\$3.0	\$3.0	\$3.0
Total Limits (millions)	\$490	\$490	\$490

*Coverage dollar amounts are in millions per week.

Federal Agency Programs and Studies

There are no known new federal agency programs or studies to report since the 2005 Triennial Nuclear Decommissioning Accrual filing.

Steps Taken To Minimize Possible Loss

The Company monitors NRC rulemaking to define methods for reducing risks associated with premature decommissioning. The Company purchases nuclear property and liability insurance from the commercial and captive markets in

amounts adequate to cover a maximum foreseeable loss. In addition, replacement power insurance is purchased to cover the cost of replacing megawatt hours lost while a unit is shut down.

Additionally, with Commission approval, the Company has accrued funds in an internal sinking fund for future decommissioning expenses since 1981. The internal fund amounts for the Minnesota Jurisdiction were transferred to the external fund under an accelerated schedule, with completion in 2005. The potential expense of a premature, non-accident related nuclear decommissioning would be partially offset by the external fund accumulations.

The Company's decommissioning fund plan and insurance levels are consistent with the NRC guidelines in NUREG-0584, Assuring the Availability of Funds for Decommissioning Nuclear Facilities, Page 49:

Although premature decommissioning insurance would be preferable, as long as adequate levels of on-site accident decontamination insurance are maintained by licensees, the author believes that such insurance, together with an internal reserve, would provide a reasonable level of assurance.

Financial Ability to Withstand Premature Nuclear Decommissioning

The Commission attempts to coordinate several goals:

1. to ensure that funds are available at the time decommissioning takes place;
2. to avoid intergenerational subsidies which occur when ratepayers in one generation subsidize ratepayers in another generation; and
3. to avoid the rate shock that would result from placing an excessive burden on a specific group of ratepayers.

There are economic and financial consequences for any premature decommissioning in general and specific expenses associated with an accident-related decommissioning. The ability to manage these uncertainties will provide customers and shareholders with financial security.

Premature Decommissioning – General

There are five major financial consequences associated with any premature decommissioning. These consequences consist of the expense of decommissioning, the replacement energy costs, the replacement capacity costs,

the recovery of un-recovered plant investment and premature decommissioning specific.

Expense of Decommissioning

As a part of this filing, four decommissioning cost estimates have been filed, showing various possible decommissioning scenarios. The decommissioning cost estimates in 2014 dollars for DECON using dry storage is \$2.71 billion for the estimate using a 36-year decommissioning period. The decommissioning cost estimate is \$3.0 billion in 2014 dollars for the estimate using a 60-year decommissioning period. The decommissioning cost estimate is \$4.9 billion in 2014 dollars for the estimate using a 100-year decommissioning period. The decommissioning cost estimate is \$9.2 billion in 2014 dollars for the estimate using a 200-year decommissioning period.

Presently the Company has an external qualified trust fund and escrow fund which can be used to offset the potential costs resulting from premature decommissioning. The maximum annual, after-tax cash requirement for a worst-case premature decommissioning scenario involving all three Company's nuclear units is considerably reduced because of 100 percent external funding.

Replacement Energy Costs

A significant cost resulting from a premature shutdown is the cost of replacement energy. Replacement energy costs for a transitional period (until a more permanent asset could be constructed) would consist of increased fuel costs due to the use of more expensive coal, natural gas, and oil, costs associated with the increased operation of our existing generation fleet or the purchase of power from others, and the loss of revenues associated with a reduction in sales to other utilities. On a more permanent nature, replacement energy costs would likely consist of a combination of increased fuel cost do to more expensive use of more natural gas, wind, solar and possibly coal. The likely increased cost of replacement energy is estimated to be in the range of 300 to 400 percent greater than the variable cost of our nuclear generation.

The variable operating costs associated with electric generation from nuclear facilities is less than for all other current forms of generation. Due to the low cost of nuclear production, relative to fossil production, the cost of replacement energy for a nuclear facility is larger than potential replacement energy costs for a fossil-generating unit. This cost could be compounded if the

replacement energy is needed during a peak period. Nuclear plants provide base load capacity and produce more energy annually than most fossil units. Therefore, more expensive energy would have to replace nuclear energy if a nuclear unit were shut down prematurely.

Replacement Capacity Costs

Current nuclear plant net capability is 1,771 MW; 671 MW for Monticello and 1,100 MW for Prairie Island Units 1 and 2. If the Company's nuclear generating capability were lost, the Company's reserve margins would be below the 12.06 percent minimum reserve level currently specified by the Midcontinent Independent System Operator, Inc., as necessary to maintain adequate electric system reliability. Therefore, nearly all of the 1,771 of MW of lost nuclear capability would have to be replaced.

A premature shutdown of this magnitude may cause a severe capacity shortage, which would become more severe as demand increases. To overcome this, the capacity shortage would have to be handled in a two-step process. This process would be to 1) purchase temporary replacement capacity and 2) to construct replacement facilities that would likely be a combination of natural gas combustion turbines and combined cycle generating units. Current cost estimates for the construction of new natural gas combustion turbines and combined cycle units can be found in the Company's most current resource plan.

Due to the length of time to complete construction of new base load plants, premature retirement of a nuclear unit or a major coal unit would necessitate the purchase of temporary replacement capacity. The purchase of this quantity of temporary replacement capacity would become a significant challenge in meeting customer demand.

Recovery of Un-recovered Investment

If there were a premature, non-accident related decommissioning, an un-recovered investment (original cost less accumulated depreciation) would continue as a revenue requirement. The un-recovered nuclear plant investment on January 1, 2014 was \$1,659 million, \$923 million at Monticello and \$736 million at Prairie Island. These figures do not include land, nuclear fuel, and general plant equipment, such as office furniture. It also does not include the un-recovered decommissioning costs.

Premature Decommissioning - Specific

An accident-related decommissioning would add additional expenses to those mentioned in the foregoing discussion. Potential contamination clean-up costs are the most significant expenses of an accident-related decommissioning. As an example, General Public Utilities has indicated that the total estimated cost for clean-up for the Three Mile Island (TMI) nuclear site was approximately \$1 billion, occurring over an estimated 11 to 12 year time period beginning in 1979. The damaged unit, at this time, is in SAFSTOR until TMI Unit 1 is ready to be decommissioned.

The Company's property insurance coverage of \$2.25 billion would largely offset the potential impact of an accident-related decommissioning. Although accident-related decommissioning expenses are significant, the length of time involved in a clean-up process, insurance payments, tax deductibility of expenses, and related rate relief would affect the yearly expense. Although accident related premature decommissioning would impact both the Company and its customers, it is anticipated that, under reasonable regulation, the financial integrity of the Company would be maintained.

Xcel Energy
Nuclear Asset Retirement Obligation Balances

Docket No. E002/M-14-761
Schedule L
Page 1 of 1

ARO Balance Sheet Accounts	FERC Acct. Num.	2013	2014
ASSETS			
Nuclear Plant In-Service - ARC		\$ 159,306,082	\$ 159,306,082 [1]
Beginning Accumulated Depreciation - Nuclear ARC	108	(102,463,212)	(106,132,270)
Depreciation Expense		(3,669,058)	(1,834,530)
Ending Accumulated Depreciation - Nuclear ARC		\$ (106,132,270)	\$ (107,966,800) [1]
Regulatory Asset Nuclear - Beginning	182.3	\$ 1,489,515,113	\$ 1,575,124,300
Asset Balance Adjustment		0	0
Reserve Balance Adjustment		0	0
ARO Liability Adjustment		0	0
Accretion Expense		81,940,128	42,585,437
Depreciation Expense		3,669,058	1,834,530
Regulatory Asset Nuclear - Ending		\$ 1,575,124,300	\$ 1,619,544,266 [1]
Total Assets		\$ 1,628,298,112	\$ 1,670,883,549
LIABILITIES			
Asset Retirement Obligation - Beginning	230	\$ (1,546,357,984)	\$ (1,628,298,112)
Accretion Expense - Nuclear		(81,940,128)	(42,585,437)
Liabilities Incurred		0	0
Asset Retirement Obligation - Ending		\$ (1,628,298,112)	\$ (1,670,883,549) [1]
Total Liabilities		\$ (1,628,298,112)	\$ (1,670,883,549)

[1] As of June 30, 2014

Order Point	Description	Where Addressed
1	Decommissioning Plan	Part a. Escalation Rates: Schedule C Part b. Earnings Rates: Schedule D Part c. Annual Accrual: Schedule H
2	Refund Requirement	Petition, Section VII: Application of DOE Settlement Proceeds to Fund the Accrual
3	2014 DOE Settlement Payment	Petition, Section VII: Application of DOE Settlement Proceeds to Fund the Accrual
4	2014 DOE Settlement Payment - External Holding Account	Petition, Section VII: Application of DOE Settlement Proceeds to Fund the Accrual
5	End-of-Life Fuel Accrual	Petition, Section IX: End-of-Life Nuclear Fuel
6	Rebalancing of the Escrow Fund	Not Done in this Filing
7	Use of Market Value of Funds	Petition, Section IV, Part D, Subpart 3: Beginning Fund Balance for Annuity Calculation
8	Recovery of Spent Fuel Management Costs	Petition, Section V: Recovery of Spent Fuel Management Costs
9	Filing Date	N/A
10	Property Tax Assumptions	Petition, Section IV, Part C, Subpart 1, Subsubpart c: Property Taxes Included in Cost Estimates
11	Premature Decommissioning	Schedule K
12	Actual Return on Decommissioning Investments: 2012-2014	Schedule D
13	Asset Retirement Obligation Balance Sheet Accounts	Petition, Section XI: Asset Retirement Obligation
14	United States GAO Report	Petition, Section VI: GAO Report on NRC Oversight of Decommissioning Funds
15	Consultant prepare Escalation Analysis	Schedule C
16	Property Taxes Paid to Host Communities	Petition, Section IV, Part C, Subpart 1, Subsubpart c: Property Taxes Included in Cost Estimates
17	Work with Host Communities	Petition, Section IV, Part C, Subpart 1, Subsubpart b: Assessment of Future Costs on State and Local Communities
18	Cost of Switching out Dry Cask Storage at 50 Years	Section IV, Part C, Subsection 1: Cost Estimate
19	Order Effective Date	Petition, Overview

Document X01-1617-006, Rev. 0

DECOMMISSIONING COST ANALYSIS
for the
MONTICELLO
NUCLEAR GENERATING PLANT



prepared for

Xcel Energy Services, Inc.

prepared by

TLG Services, Inc.
Bridgewater, Connecticut

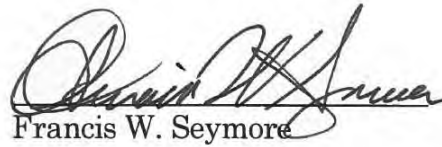
October 2014

**Monticello Nuclear Generating Plant
Decommissioning Cost Analysis**

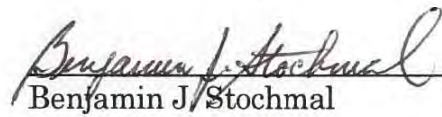
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APPROVALS

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**Monticello Nuclear Generating Plant
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REVISION LOG

No.	Date	Item Revised	Reason for Revision
0	10-03-14		Original Issue

EXECUTIVE SUMMARY

This report presents estimates of the cost to promptly decommission the Monticello Nuclear Generating Plant (Monticello) following cessation of plant operations and the operation and eventual decommissioning of the on-site Independent Spent Fuel Storage Installation (ISFSI). The prompt decommissioning, or DECON method, as described below, was selected as it is the most cost-effective of the alternatives (in current dollars) to achieve the objectives of decommissioning. The analysis relies upon site-specific, technical information from an earlier evaluation prepared in 2011,^[1] updated to reflect current assumptions pertaining to the disposition of nuclear power plants and relevant industry experience in undertaking such projects. The costs are based on several key assumptions in areas of regulation, component characterization, high-level radioactive waste management, low-level radioactive waste disposal, performance uncertainties (contingency) and site restoration requirements.

The current estimates are designed to provide Xcel Energy with sufficient information to assess their financial obligations, as they pertain to the eventual decommissioning of the nuclear unit. The analysis is not a detailed engineering document, but a financial analysis prepared in advance of the detailed engineering that will be required to carry out the decommissioning. It may also not reflect the actual plan to decommission Monticello; the plan may differ from the assumptions made in this analysis based on facts that exist at the time of decommissioning.

The primary goal of decommissioning is the removal and disposal of the contaminated systems and structures so that the plant's operating license can be terminated. This analysis recognizes that spent fuel will be stored at the site in the plant's storage pool and/or in an ISFSI until such time that it can be transferred to a U.S. Department of Energy (DOE) facility. Consequently, the estimates also include those costs to manage and subsequently decommission these storage facilities.

The Monticello site currently consists of a single operating boiling water reactor and an ISFSI. The currently projected cost to decommission the station assuming all spent nuclear fuel is removed by 2066 (Scenario 1) is estimated at \$1.114 billion. Costs are reported in 2014 dollars and include monies anticipated to be spent for radiological remediation and operating license termination, spent fuel management, and site restoration activities. The costs to decommission Monticello for the

¹ "Decommissioning Cost Analysis for the Monticello Nuclear Generating Plant," Document No. X01-1617-004 Rev. 1, TLG Services, Inc., December 2011

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scenarios evaluated are tabulated at the end of this section. Three additional estimates are provided for extended spent fuel storage scenarios (Scenarios 2, 3, and 4). The estimates are based on numerous fundamental assumptions, including regulatory requirements, low-level radioactive waste disposal practices, high-level radioactive waste management options, site restoration requirements, and project contingencies. The estimates incorporate a minimum cooling period for the spent fuel that resides in the storage pool when operations cease. Any residual fuel remaining in the pool after the cooling period is relocated to the ISFSI to await transfer to a DOE facility. The estimates also include the dismantling of site structures and non-essential facilities and the limited restoration of the site.

The cost estimates assume that the shutdown date of the nuclear unit is scheduled and pre-planned (i.e., there is no delay in transitioning the plant and workforce from operations or in obtaining regulatory relief from operating requirements, etc.). The estimates include the continued operation of the fuel handling area of the reactor building as a wet fuel storage facility for approximately 15 years after operations cease. During this time period, it is assumed that the spent fuel residing in the pool will be transferred to an independent spent fuel storage installation (ISFSI) located on the site. The ISFSI will remain operational until the spent fuel is transferred to an appropriate disposal facility. ^[2]

A complete discussion of the assumptions relied upon in this analysis is provided in Section 3, along with schedules of annual expenditures for each scenario. A sequence of significant project activities is provided in Section 4 with a timeline for each scenario. Detailed cost reports used to generate the summary tables contained within this document are provided in Appendices C through F.

Alternatives and Regulations

The ultimate objective of the decommissioning process is to reduce the inventory of contaminated and activated material so that the license(s) can be terminated. The Nuclear Regulatory Commission (NRC or Commission) provided general decommissioning requirements in its rule adopted on June 27, 1988.^[3] In this rule, the NRC set forth technical and financial criteria for decommissioning licensed nuclear power facilities. The regulations addressed planning needs, timing, funding methods, and environmental review requirements for decommissioning. The rule also defined

² Projected expenditures for spent fuel management identified in the cost analyses do not consider credit for DOE's payment of damages to Xcel Energy for DOE's failure to perform under the terms of the disposal contract between DOE and Xcel Energy.

³ U.S. Code of Federal Regulations, Title 10, Parts 30, 40, 50, 51, 70 and 72 "General Requirements for Decommissioning Nuclear Facilities," Nuclear Regulatory Commission, Federal Register Volume 53, Number 123 (p 24018 et seq.), June 27, 1988

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three decommissioning alternatives as being acceptable to the NRC: DECON, SAFSTOR, and ENTOMB.

DECON is defined as "the alternative in which the equipment, structures, and portions of a facility and site containing radioactive contaminants are removed or decontaminated to a level that permits the property to be released for unrestricted use shortly after cessation of operations."^[4]

SAFSTOR is defined as "the alternative in which the nuclear facility is placed and maintained in a condition that allows the nuclear facility to be safely stored and subsequently decontaminated (deferred decontamination) to levels that permit release for unrestricted use."^[5] Decommissioning is required to be completed within 60 years, although longer time periods will be considered when necessary to protect public health and safety.

ENTOMB is defined as "the alternative in which radioactive contaminants are encased in a structurally long-lived material, such as concrete; the entombed structure is appropriately maintained and continued surveillance is carried out until the radioactive material decays to a level permitting unrestricted release of the property."^[6] As with the SAFSTOR alternative, decommissioning is currently required to be completed within 60 years, although longer time periods will be considered when necessary to protect public health and safety.

The 60-year restriction has limited the practicality for the ENTOMB alternative at commercial reactors that generate significant amounts of long-lived radioactive material. In 1997, the Commission directed its staff to re-evaluate this alternative and identify the technical requirements and regulatory actions that would be necessary for entombment to become a viable option. The resulting evaluation provided several recommendations; however, rulemaking has been deferred pending the completion of additional research studies, for example, on engineered barriers.

In 1996, the NRC published revisions to its general requirements for decommissioning nuclear power plants to clarify ambiguities and codify procedures and terminology as a means of enhancing efficiency and uniformity in the decommissioning process.^[7] The

⁴ Ibid. Page FR24022, Column 3

⁵ Ibid.

⁶ Ibid. Page FR24023, Column 2

⁷ U.S. Code of Federal Regulations, Title 10, Parts 2, 50, and 51, "Decommissioning of Nuclear Power Reactors," Nuclear Regulatory Commission, Federal Register Volume 61, (p 39278 et seq.), July 29,

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amendments allow for greater public participation and better define the transition process from operations to decommissioning. Regulatory Guide 1.184, issued in July 2000, further described the methods and procedures that are acceptable to the NRC staff for implementing the requirements of the 1996 revised rule that relate to the initial activities and the major phases of the decommissioning process. The costs and schedules presented in this analysis follow the general guidance and sequence described in the amended regulations. The format and content of the estimates is also consistent with the recommendations of Regulatory Guide 1.202, issued in February 2005.^[8]

In 2011, the NRC published amended regulations to improve decommissioning planning and thereby reduce the likelihood that any current operating facility will become a legacy site.^[9] The amended regulations require licensees to conduct their operations to minimize the introduction of residual radioactivity into the site, which includes the site's subsurface soil and groundwater. Licensees also may be required to perform site surveys to determine whether residual radioactivity is present in subsurface areas and to keep records of these surveys with records important for decommissioning. The amended regulations require licensees to report additional details in their decommissioning cost estimate as well as requiring additional financial reporting and assurances. These additional details, including the ISFSI decommissioning estimate, are included in this analysis.

Decommissioning Scenarios

The following scenarios were evaluated and are intended to bound the liability associated with the removal of spent fuel from the site. The current operating license expires in 2030. In all four scenarios, decommissioning activities commence shortly after the cessation of plant operations. The spent fuel in the plant's spent fuel storage pool is transferred to the ISFSI within the first fifteen years. The equipment, structures, and portions of the plant containing radioactive contaminants are removed or decontaminated to a level that permits the facility to be released for unrestricted use. Non-essential structures are then demolished. Spent fuel storage operations continue at the ISFSI until the transfer of the fuel to the DOE is completed (2066 in Scenario 1, 2090 in Scenario 2, 2130 in Scenario 3, and 2230 in Scenario 4).

1996

⁸ "Standard Format and Content of Decommissioning Cost Estimates for Nuclear Power Reactors," Regulatory Guide 1.202, U.S. Nuclear Regulatory Commission, February 2005

⁹ U.S. Code of Federal Regulations, Title 10, Parts 20, 30, 40, 50, 70, and 72, "Decommissioning Planning," Nuclear Regulatory Commission, Federal Register Volume 76, (p 35512 et seq.), June 17, 2011

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Scenario	1 st Spent Fuel Canister Replacement	1 st Spent Fuel Assembly Removed from Monticello	Last Spent Fuel Assembly Removed from Monticello
1	n/a	2043	2066
2	n/a	2077	2090
3	2058	2117	2130
4	2058	2217	2230

For Scenario 2, although it provides a total fuel storage period of 60 years following plant shutdown. Xcel Energy directed TLG Services to not include the cost of transferring the spent fuel in dry storage to new canisters at 50 years after plant shutdown. The assumption to not transfer spent fuel at 50 years following plant shutdown in Scenario 2 was premised on the likelihood that the life of the canisters could be successfully managed for an additional 10 years.

In Scenarios 3 and 4, the DSCs are assumed to be replaced after fifty years of use. Since the reactor building spent fuel storage pool and fuel handling facilities are removed by the year 2048, a dry fuel transfer facility is assumed to be constructed on site to perform the transfers from the old to the new DSCs. For Scenario 3, only one such transfer is needed over the time frame assumed. For Scenario 4, the spent fuel will be transferred three times following initial placement in the ISFSI.

Methodology

The methodology used to develop the estimates described within this document follows the basic approach originally presented in the cost estimating guidelines^[10] developed by the Atomic Industrial Forum (now Nuclear Energy Institute). This reference describes a unit cost factor method for estimating decommissioning activity costs. The unit cost factors used in this analysis incorporate site-specific costs and the latest available information about worker productivity in decommissioning.

An activity duration critical path is used to determine the total decommissioning program schedule. This schedule is required upon in calculating the carrying costs, which include program management, administration, field engineering, equipment rental, and support services such as quality assurance and security. This systematic approach for assembling decommissioning estimates ensures a high degree of confidence in the reliability of the resulting cost estimate.

¹⁰ T.S. LaGuardia et al., "Guidelines for Producing Commercial Nuclear Power Plant Decommissioning Cost Estimates," AIF/NESP-036, May 1986

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Contingency

Consistent with cost estimating practice, contingencies are applied to the decontamination and dismantling costs developed as "specific provision for unforeseeable elements of cost within the defined project scope, particularly important where previous experience relating estimates and actual costs has shown that unforeseeable events which will increase costs are likely to occur."^[11] The cost elements in the estimates are based on ideal conditions; therefore, the types of unforeseeable events that are almost certain to occur in decommissioning, based on industry experience, are addressed through a percentage contingency applied on a line-item basis. This contingency factor is a nearly universal element in all large-scale construction and demolition projects. It should be noted that contingency, as used in this analysis, does not account for price escalation and inflation in the cost of decommissioning over the remaining operating life of the station or duration of the decommissioning program and dry fuel storage period.

Contingency funds are expected to be fully expended throughout the program. As such, inclusion of contingency is necessary to provide assurance that sufficient funding will be available to accomplish the intended tasks.

Low-Level Radioactive Waste Disposal

The contaminated and neutron-activated material generated in the decontamination and dismantling of a commercial nuclear reactor is classified as low-level (radioactive) waste, although not all of the material is suitable for "shallow-land" disposal. With the passage of the "Low-Level Radioactive Waste Policy Act" in 1980,^[12] and its Amendments of 1985,^[13] the states became ultimately responsible for the disposition of low-level radioactive waste generated within their own borders. It was expected that groups of states would combine together to jointly deal with their radioactive wastes; these organizations are referred to as waste disposal compacts.

Few approved facilities for the disposal of LLW are currently available. Construction of the newest facility, in Texas, is now complete and the facility was declared operational by the operator, Waste Control Specialists (WCS), in November 2011. The facility will be able to accept limited quantities of non-

¹¹ Project and Cost Engineers' Handbook, Second Edition, American Association of Cost Engineers, Marcel Dekker, Inc., New York, New York, p. 239

¹² "Low-Level Radioactive Waste Policy Act of 1980," Public Law 96-573, 1980

¹³ "Low-Level Radioactive Waste Policy Amendments Act of 1985," Public Law 99-240, 1986

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Compact waste; however, at this time the cost for non-Compact generators is being negotiated on an individual basis.

All options and services currently available to Xcel Energy for disposition of the various waste streams produced by the decommissioning process were considered. The majority of the low-level radioactive waste designated for direct disposal (Class A ^[14]) can be sent to EnergySolutions' facility in Clive, Utah. For the purpose of this analysis, Xcel Energy's "Utilities Service Alliance" agreement with EnergySolutions for offsite processing and disposal is used as the basis for estimating the cost for disposition of the majority of the radioactive waste (Class A). EnergySolutions does not have a license to dispose of the more highly radioactive waste (Classes B and C), for example, generated in the dismantling of the reactor vessel.

The Texas facility is licensed to receive the higher activity waste forms (Classes B and C). As such, for this analysis, disposal costs for the Class B and C waste were based upon the preliminary and indicative information on the cost for such from WCS.

The dismantling of the components residing closest to the reactor core generates radioactive waste that may be considered unsuitable for shallow-land disposal (i.e., low-level radioactive waste with concentrations of radionuclides that exceed the limits established by the NRC for Class C radioactive waste, or greater than Class C (GTCC)). The Low-Level Radioactive Waste Policy Amendments Act of 1985 assigned the federal government the responsibility for the disposal of this material. The Act also stated that the beneficiaries of the activities resulting in the generation of such radioactive waste bear all reasonable costs of disposing of such waste. However, to date, the federal government has not identified a cost for disposing of GTCC or a schedule for acceptance.

For purposes of this analysis, the GTCC radioactive waste is assumed to be packaged and disposed of in a similar manner as high-level waste and at a cost equivalent to that envisioned for the spent fuel. The GTCC is packaged in the same canisters used for spent fuel and either stored on site or shipped directly to a disposal facility as it is generated (depending upon the timing of the decommissioning and whether the spent fuel has been removed from the site prior to the start of decommissioning).

A significant portion of the waste material generated during decommissioning may only be potentially contaminated by radioactive materials. This waste can be

¹⁴ U.S. Code of Federal Regulations, Title 10, Part 61, "Licensing Requirements for Land Disposal of Radioactive Waste"

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analyzed on site or shipped off site to licensed facilities for further analysis, processing and/or conditioning/recovery. Reduction in the volume of low-level radioactive waste requiring disposal in a licensed low-level radioactive waste disposal facility can be accomplished through a variety of methods, including analyses and surveys or decontamination to eliminate the portion of waste that does not require disposal as radioactive waste, compaction, incineration or metal melt. The estimates for Monticello reflect the savings from radioactive waste recovery/volume reduction. Material removed during decommissioning that is less than the site release criteria will be designated for conventional disposal or reuse / recovery.

High-Level Radioactive Waste Management

Congress passed the “Nuclear Waste Policy Act”^[15] (NWPA) in 1982, assigning the federal government’s long-standing responsibility for disposal of the spent nuclear fuel created by the commercial nuclear generating plants to the DOE. The NWPA provided that DOE would enter into contracts with utilities in which DOE would promise to take the utilities’ spent fuel and high-level radioactive waste and utilities would pay the cost of the disposition services for that material. NWPA, along with the individual contracts with the utilities, specified that the DOE was to begin accepting spent fuel by January 31, 1998.

Since the original legislation, the DOE has announced several delays in the program schedule. By January 1998, the DOE had failed to accept any spent fuel or high level waste, as required by the NWPA and utility contracts. Delays continue and, as a result, generators have initiated legal action against the DOE in an attempt to obtain compensation for DOE’s partial breach of contract. To date no spent fuel has been accepted from commercial generating sites for disposal.

Completion of the decommissioning process is dependent upon the DOE’s ability to remove spent fuel from the site in a timely manner. DOE’s repository program assumes that spent fuel allocations will be accepted for disposal from the nation’s commercial nuclear plants, with limited exceptions, in the order (the “queue”) in which it was discharged from the reactor.^[16] Xcel Energy’s current spent fuel

¹⁵ “Nuclear Waste Policy Act of 1982 and Amendments,” DOE’s Office of Civilian Radioactive Management, 1982

¹⁶ In 2008, the DOE issued a report to Congress in which it concluded that it did not have authority, under present law, to accept spent nuclear fuel for interim storage from decommissioned commercial nuclear power reactor sites. However, the Blue Ribbon Commission, in its final report, noted that: “[A]ccepting spent fuel according to the OFF [Oldest Fuel First] priority ranking instead of giving priority to shutdown reactor sites could greatly reduce the cost savings that could be achieved through consolidated storage if priority could be given to accepting spent fuel from

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management plan for the Monticello spent fuel assumed in this estimate is based in general upon: 1) a 2025 start date for DOE initiating transfer of commercial spent fuel to a federal facility (not necessarily a final repository), and 2) expectations for spent fuel receipt by the DOE for the Monticello fuel. The DOE's generator allocation/receipt schedules are based upon the oldest fuel receiving the highest priority. Assuming a maximum rate of transfer of 3,000 metric tons of uranium (MTU)/year,^[17] the removal of spent fuel from the site is completed in 2066 under Scenario 1. Different DOE acceptance schedules result in different completion dates.

Today, the country is at an impasse on high-level waste disposal. The administration appointed a Blue Ribbon Commission on America's Nuclear Future (Blue Ribbon Commission) to make recommendations for a new plan for nuclear waste disposal. The Blue Ribbon Commission's charter includes a requirement that it consider "[o]ptions for safe storage of used nuclear fuel while final disposition pathways are selected and deployed."^[18]

On January 26, 2012, the Blue Ribbon Commission issued its "Report to the Secretary of Energy" containing a number of recommendations on nuclear waste disposal. Two of the recommendations that may impact decommissioning planning are:

- "[T]he United States [should] establish a program that leads to the timely development of one or more consolidated storage facilities"^[19]
- "[T]he United States should undertake an integrated nuclear waste management program that leads to the timely development of one or more permanent deep geological facilities for the safe disposal of spent fuel and high-level nuclear waste."^[20]

In January 2013, the DOE issued the "Strategy for the Management and Disposal of Used Nuclear Fuel and High-Level Radioactive Waste," in response to the recommendations made by the Blue Ribbon Commission and as "a framework for

shutdown reactor sites before accepting fuel from still-operating plants. The magnitude of the cost savings that could be achieved by giving priority to shutdown sites appears to be large enough (i.e., in the billions of dollars) to warrant DOE exercising its right under the Standard Contract to move this fuel first."

¹⁷ "Acceptance Priority Ranking & Annual Capacity Report," DOE/RW-0567, July 2004

¹⁸ Ibid.

¹⁹ "Blue Ribbon Commission on America's Nuclear Future, Report to the Secretary of Energy," <http://www.brc.gov/>, p. 32, January 2012

²⁰ Ibid., p.27

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moving toward a sustainable program to deploy an integrated system capable of transporting, storing, and disposing of used nuclear fuel...”^[21] This document states:

“With the appropriate authorizations from Congress, the Administration currently plans to implement a program over the next 10 years that:

- Sites, designs and licenses, constructs and begins operations of a pilot interim storage facility by 2021 with an initial focus on accepting used nuclear fuel from shut-down reactor sites;
- Advances toward the siting and licensing of a larger interim storage facility to be available by 2025 that will have sufficient capacity to provide flexibility in the waste management system and allows for acceptance of enough used nuclear fuel to reduce expected government liabilities; and
- Makes demonstrable progress on the siting and characterization of repository sites to facilitate the availability of a geologic repository by 2048.”^[22]

The NRC’s review of DOE’s license application to construct a geologic repository at Yucca Mountain was suspended in 2011 when the Administration slashed the budget for completing that work. However, the US Court of Appeals for the District of Columbia Circuit recently issued a writ of mandamus (in August 2013) ^[23] ordering NRC to comply with federal law and restart its review of DOE’s Yucca Mountain repository license application to the extent of previously appropriated funding for the review. That review is now underway. The current schedule calls for completion and publication of the safety evaluation report by January 2015. The adjudicatory hearing, which must be completed before a licensing decision can be made, remains suspended.

In addition, the state of Minnesota directed the Public Utilities Commission, “when considering approval of a plan for the accrual of funds for the decommissioning of nuclear facilities” ...to “include an evaluation of the costs, if any, arising from storage of used nuclear fuel that may be incurred by the state of Minnesota, and any tribal

²¹ “Strategy for the Management and Disposal of Used Nuclear Fuel and High-Level Radioactive Waste,” U.S. DOE, January 11, 2013

²² *Ibid.*, p.2

²³ United States Court of Appeals for the District Of Columbia Circuit, In Re: Aiken County, et al, August 2013
[http://www.cadc.uscourts.gov/internet/opinions.nsf/BAE0CF34F762EBD985257BC6004DEB18/\\$file/11-1271-1451347.pdf](http://www.cadc.uscourts.gov/internet/opinions.nsf/BAE0CF34F762EBD985257BC6004DEB18/$file/11-1271-1451347.pdf)

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community, county, city, or township where used nuclear fuel is located following the cessation of operations at a nuclear plant.”^[24]

The state of Minnesota statute also prescribed the parameters to be used in evaluating spent fuel management costs. “To assist the commission in making the determination ... the filing shall provide cost estimates, including ratepayer impacts, assuming used nuclear fuel will be stored in the state for 60 years, 100 years, and 200 years following the cessation of operation of the nuclear plant.”^[25]

Xcel Energy’s current spent fuel management plan for the Monticello spent fuel is based in general upon:

- 1) Fuel transferred from the pool to the ISFSI within 15 years of shutdown;
- 2) Exchange of Monticello and Prairie Island spent fuel acceptance rights to best manage the overall cost of spent fuel storage for both plants;
- 3) Fuel will be shipped in the existing NUHOMS DSCs (Scenarios 1 and 2); canisters that are unloaded in the spent fuel transfer operation (Scenarios 3 and 4) are assumed to be mildly neutron activated and therefore must be disposed of as radioactive waste, and
- 4) Availability of a DOE interim or permanent storage repository by 2025 (Scenario 1), 2049 (Scenario 2), 2089 (Scenario 3), or 2189 (Scenario 4). First shipment of fuel from the Monticello site occurs two years after DOE initial availability.

The NRC requires that licensees establish a program to manage and provide funding for the caretaking of all irradiated fuel at the reactor site until title of the fuel is transferred to the Secretary of Energy, pursuant to 10 CFR Part 50.54(bb).^[26] This requirement is prepared for through inclusion of certain cost elements in the decommissioning estimates, for example, associated with the isolation and continued operation of the spent fuel pool and the ISFSI.

The spent fuel pool is expected to contain freshly discharged assemblies (from the most recent refueling cycles) as well as the final reactor core at shutdown. Over the

²⁴ Minnesota Statute 216B.1614, “Nuclear Power Plant Decommissioning and Storage of Used Nuclear Fuel”

²⁵ Ibid.

²⁶ U.S. Code of Federal Regulations, Title 10, Part 50, “Domestic Licensing of Production and Utilization Facilities,” Subpart 54 (bb), “Conditions of Licenses”

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following fifteen years, the assemblies are packaged into DSCs for transfer to the ISFSI for interim storage. It is assumed that this period provides the necessary cooling for the final core to meet the storage requirements for decay heat.

An ISFSI, operated under a Part 50 General License (in accordance with 10 CFR 72, Subpart K^[27]), has been constructed to support continued plant operations. The facility is assumed to be expanded to support decommissioning. This will allow decommissioning activities to proceed within the reactor building.

The DOE has a contractual obligation to accept Monticello' fuel earlier than the projections set out above consistent with its contract commitments. No assumption made in this study should be interpreted to be inconsistent with this claim. However, including the cost of storing spent fuel in this study is appropriate to ensure the availability of sufficient decommissioning funds at the end of the station's life if the DOE has not met its obligation.

Site Restoration

The efficient removal of the contaminated materials at the site may result in damage to many of the site structures. Blasting, coring, drilling, and the other decontamination activities can substantially damage power block structures, potentially weakening the footings and structural supports. Immediate dismantling of site structures (once the facilities are decontaminated) is clearly the most appropriate and cost-effective option. It is unreasonable to anticipate that these structures would be repaired and preserved after the radiological contamination is removed. The cost to dismantle site structures with a work force already mobilized on site is more efficient and less costly than if the process is deferred. Site facilities quickly degrade without maintenance, adding additional expense and creating potential hazards to the public and the demolition work force. Consequently, this study assumes that site structures are removed to a nominal depth of three feet below the local grade level wherever possible. The site is then to be graded and stabilized.

This estimate assumes that some site features will remain following the decommissioning project. These include the existing electrical switchyard, which is assumed to remain functional in support of the regional electrical distribution system; the existing shoreline, canals, and ponds will be left intact.

²⁷ U.S. Code of Federal Regulations, Title 10, Part 72, Subpart K, "General License for Storage of Spent Fuel at Power Reactor Sites."

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Summary

The cost to promptly decommission the Monticello station assumes the removal of all contaminated and activated plant components and structural materials such that Xcel Energy may then have unrestricted use of the site (exclusive of the ISFSI) with no further requirements for an operating license. Low-level radioactive waste, other than GTCC waste, is sent to a commercial processor for treatment/conditioning or a controlled disposal facility.

The decommissioning scenarios are described in Section 2. The assumptions are presented in Section 3, along with schedules of annual expenditures. The major cost contributors are identified in Section 6, with detailed activity costs, waste volumes, and associated manpower requirements delineated in Appendices C through F. The major cost components are also identified in the cost summary provided at the end of this section.

The cost elements in the estimates are assigned to one of three subcategories: NRC License Termination, Spent Fuel Management, and Site Restoration. The subcategory “NRC License Termination” is used to accumulate costs that are consistent with “decommissioning” as defined by the NRC in its financial assurance regulations (i.e., 10 CFR Part 50.75). The cost reported for this subcategory is generally sufficient to terminate the unit operating license, recognizing that there may be some additional cost impact from spent fuel management.

The “Spent Fuel Management” subcategory contains costs associated with the containerization and transfer of spent fuel to the ISFSI, and the management of the ISFSI until such time that the transfer of all fuel from this facility to an off-site location (e.g., geologic repository) is complete.

“Site Restoration” is used to capture costs associated with the dismantling and demolition of buildings and facilities demonstrated to be free from contamination. This includes structures never exposed to radioactive materials, as well as those facilities that have been decontaminated to appropriate levels. Structures are removed to a depth of three feet and backfilled to conform to local grade.

It should be noted that the costs assigned to these subcategories are allocations. Delegation of cost elements is for the purposes of comparison (e.g., with NRC financial guidelines) or to permit specific financial treatment (e.g., ARO determinations). In reality, there can be considerable interaction between the activities in the three subcategories. For example, an owner may decide to remove non-contaminated structures early in the project to improve access to highly contaminated facilities or plant components. In these instances, the non-contaminated removal costs could be

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reassigned from Site Restoration to an NRC License Termination support activity. However, in general, the allocations represent a reasonable accounting of those costs that can be expected to be incurred for the specific subcomponents of the total estimated program cost, if executed as described.

The estimates presented in this document reflects the total cost to decontaminate the nuclear station, manage the spent fuel until the DOE is able to complete the transfer to a federal facility, dismantle the plant and restore the site for alternative use.

As noted within this document, the estimates were developed and costs are presented in 2014 dollars. As such, the estimates do not reflect the escalation of costs (due to inflationary and market forces) over the remaining operating life of the plant or during the decommissioning period.

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**SCENARIO 1
COST SUMMARY
MONTICELLO NUCLEAR GENERATING PLANT
DECOMMISSIONING COST ELEMENTS
(thousands of 2014 dollars)**

Cost Element	Costs
Decontamination	19,887
Removal	95,673
Packaging	29,423
Transportation	11,606
Waste Disposal	85,832
Off-site Waste Processing	28,802
Program Management ^[1]	334,224
Railroad Track Maintenance	4,580
Spent Fuel Management (direct costs) ^[2]	225,000
Insurance and Regulatory Fees	32,367
Energy	30,702
Characterization and Licensing Surveys	22,669
Property Taxes	47,042
Miscellaneous Equipment	7,414
Spent Fuel Pool Isolation	12,434
Security	125,973
Total ^[3]	1,113,628

Cost Element	Costs
License Termination	697,451
Spent Fuel Management	375,071
Site Restoration	41,106
Total ^[3]	1,113,628

^[1] Includes engineering and security costs

^[2] Excludes program management costs (staffing) but includes capital expenditures for ISFSI construction, costs for spent fuel loading/packaging/spent fuel pool O&M and EP fees

^[3] Columns may not add due to rounding

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**SCENARIO 2
COST SUMMARY
MONTICELLO NUCLEAR GENERATING PLANT
DECOMMISSIONING COST ELEMENTS
(thousands of 2014 dollars)**

Cost Element	Costs
Decontamination	19,887
Removal	95,673
Packaging	29,423
Transportation	11,606
Waste Disposal	85,832
Off-site Waste Processing	28,802
Program Management ^[1]	368,279
Railroad Track Maintenance	4,283
Spent Fuel Management (direct costs) ^[2]	296,659
Insurance and Regulatory Fees	46,934
Energy	30,702
Characterization and Licensing Surveys	22,669
Property Taxes	62,507
Miscellaneous Equipment	7,414
Spent Fuel Pool Isolation	12,434
Security	184,812
Total ^[3]	1,307,915

Cost Element	Costs
License Termination	697,450
Spent Fuel Management	569,359
Site Restoration	41,106
Total ^[3]	1,307,915

^[1] Includes engineering and security costs

^[2] Excludes program management costs (staffing) but includes capital expenditures for ISFSI construction, costs for spent fuel loading/packaging/spent fuel pool O&M and EP fees

^[3] Columns may not add due to rounding

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**SCENARIO 3
COST SUMMARY
MONTICELLO NUCLEAR GENERATING PLANT
DECOMMISSIONING COST ELEMENTS
(thousands of 2014 dollars)**

Cost Element	Costs
Decontamination	19,922
Removal	96,055
Packaging	29,428
Transportation	12,286
Waste Disposal	96,158
Off-site Waste Processing	28,802
Program Management ^[1]	496,803
Railroad Track Maintenance	4,283
Spent Fuel Management (direct costs) ^[2]	756,819
Insurance and Regulatory Fees	71,203
Energy	30,702
Characterization and Licensing Surveys	22,669
Property Taxes	156,616
Miscellaneous Equipment	7,414
Spent Fuel Pool Isolation	12,434
Security	282,841
Total ^[3]	2,124,434

Cost Element	Costs
License Termination	697,778
Spent Fuel Management	1,385,171
Site Restoration	41,485
Total ^[3]	2,124,434

^[1] Includes engineering and security costs

^[2] Excludes program management costs (staffing) but includes capital expenditures for ISFSI construction, costs for spent fuel loading/packaging/spent fuel pool O&M and EP fees

^[3] Columns may not add due to rounding

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**SCENARIO 4
COST SUMMARY
MONTICELLO NUCLEAR GENERATING PLANT
DECOMMISSIONING COST ELEMENTS
(thousands of 2014 dollars)**

Cost Element	Costs
Decontamination	19,922
Removal	96,055
Packaging	29,428
Transportation	13,840
Waste Disposal	119,801
Off-site Waste Processing	28,802
Program Management ^[1]	1,096,781
Railroad Track Maintenance	4,283
Spent Fuel Management (direct costs) ^[2]	1,846,162
Insurance and Regulatory Fees	131,882
Energy	30,702
Characterization and Licensing Surveys	22,669
Property Taxes	156,617
Miscellaneous Equipment	7,414
Spent Fuel Pool Isolation	12,434
Security	527,940
Total ^[3]	4,114,730

Cost Element	Costs
License Termination	697,778
Spent Fuel Management	3,405,467
Site Restoration	41,485
Total ^[3]	4,114,730

^[1] Includes engineering and security costs

^[2] Excludes program management costs (staffing) but includes capital expenditures for ISFSI construction, costs for spent fuel loading/packaging/spent fuel pool O&M and EP fees

^[3] Columns may not add due to rounding

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1. INTRODUCTION

This report presents estimates of the cost to promptly decommission the Monticello Nuclear Generating Plant (Monticello) following cessation of plant operations and the operation and eventual decommissioning of the on-site Independent Spent Fuel Storage Installation (ISFSI). The analysis relies upon site-specific, technical information from an earlier evaluation prepared in 2011,^{[1]*} updated to reflect current assumptions pertaining to the disposition of the nuclear station and relevant industry experience in undertaking such projects. The current estimates are designed to provide Xcel Energy with sufficient information to assess its financial obligations, as they pertain to the eventual decommissioning of the nuclear station. It is not a detailed engineering document, but a financial analysis prepared in advance of the detailed engineering that will be required to carry out the decommissioning. It may also not reflect the actual plan to decommission Monticello; the plan may differ from the assumptions made in this analysis based on facts that exist at the time of decommissioning.

1.1 OBJECTIVES OF STUDY

The objectives of this study are to prepare comprehensive estimates of the costs to decommission the Monticello station, to provide a sequence or schedule for the associated activities, and to develop waste stream projections from the decontamination and dismantling activities.

The operating license was originally issued for the plant on September 8th, 1970, and was valid for a period of 40 years. In early 2005, Nuclear Management Company (as agent for Xcel Energy), submitted an application for a renewed license (i.e., 20 year extension). The application was approved by the NRC in November 2006. Therefore, for the purposes of this study, the final shutdown date (license expiration) for Monticello is September 8th, 2030, assuming a 60-year operating life (the current operating license's expiration date).

1.2 SITE DESCRIPTION

Monticello is located on the Mississippi River within the city limits of Monticello, in Wright County, Minnesota. The plant is located approximately 30 miles northwest of the Minneapolis-St. Paul area.

* References provided in Section 7 of the document

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The Nuclear Steam Supply System (NSSS) consists of a single cycle, forced circulation, low power density boiling water reactor. The reactor recirculation system is comprised of the reactor vessel; the two loop reactor recirculation system with its pumps, pipes, and valves; the main steam piping up to the main steam isolation valves; and the reactor auxiliary systems piping. The system is housed within a "containment system," consisting of a steel light bulb-shaped drywell, a steel doughnut-shaped pressure suppression chamber, and interconnecting vent pipes. This system provides the first containment barrier surrounding the reactor vessel and reactor primary system. The reactor building provides secondary containment and is designed as a controlled leakage structure.

The saturated steam leaving the reactor vessel flows through the four main steam lines to the main turbine located in the turbine building. After passing through the main turbine, low-pressure steam is condensed, the non-condensable gases are removed, and the condensate is demineralized before being returned to the reactor vessel through the reactor feedwater system heaters. The turbine-generator system converts the thermodynamic energy of the steam into electrical energy. The unit's turbine-generator consists of one single-flow, high-pressure, and two double-flow, low-pressure turbines driving a direct-coupled generator at 1800 rpm. Heat rejected in the main condenser is removed by the circulating water system.

The circulating water system has been designed for open cycle once-through cooling towers, closed cycle with cooling towers, or for variations of these modes, i.e., partial recirculation. The system for open cycle operation consists of an intake structure with two half-capacity circulating water pumps, piping river water through the condenser to a discharge structure where the water enters a 1000-foot long canal that returns the water to the river downstream from the intake. Two induced-draft cooling towers are used during the open and closed cycle operations. Cooled effluent returns by gravity to the intake structure from the cooling tower basins.

1.3 REGULATORY GUIDANCE

The Nuclear Regulatory Commission (NRC or Commission) provided initial decommissioning requirements in its rule "General Requirements for Decommissioning Nuclear Facilities," issued in June 1988.^[2] This rule set forth financial criteria for decommissioning licensed nuclear power facilities. The regulation addressed decommissioning planning needs, timing, funding methods, and environmental review requirements. The intent of the rule was to ensure that decommissioning would be accomplished in a safe and timely

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manner and that adequate funds would be available for this purpose. Subsequent to the rule, the NRC issued Regulatory Guide 1.159, "Assuring the Availability of Funds for Decommissioning Nuclear Reactors,"^[3] which provided additional guidance to the licensees of nuclear facilities on the financial methods acceptable to the NRC staff for complying with the requirements of the rule. The regulatory guide addressed the funding requirements and provided guidance on the content and form of the financial assurance mechanisms indicated in the rule.

The rule defined three decommissioning alternatives as being acceptable to the NRC: DECON, SAFSTOR, and ENTOMB. The DECON alternative assumes that any contaminated or activated portion of the plant's systems, structures and facilities are removed or decontaminated to levels that permit the site to be released for unrestricted use shortly after the cessation of plant operations; while the SAFSTOR and ENTOMB alternatives defer the process.

The rule also placed limits on the time allowed to complete the decommissioning process. For SAFSTOR, the process is restricted in overall duration to 60 years, unless it can be shown that a longer duration is necessary to protect public health and safety. The guidelines for ENTOMB are similar, providing the NRC with both sufficient leverage and flexibility to ensure that this deferred option is only used in situations where it is reasonable and consistent with the definition of decommissioning. At the conclusion of a 60-year dormancy period (or longer for ENTOMB if the NRC approves such a case), the site would still require significant remediation to meet the unrestricted release limits for license termination.

The ENTOMB alternative has not been viewed as a viable option for power reactors due to the significant time required to isolate the long-lived radionuclides for decay to permissible levels. However, with rulemaking permitting the controlled release of a site,^[4] the NRC did evaluate this alternative. The resulting feasibility study, based upon an assessment by Pacific Northwest National Laboratory, concluded that the method did have conditional merit for some, if not most reactors. However, the staff also found that additional rulemaking would be needed before this option could be treated as a generic alternative. The NRC had considered rulemaking to alter the 60-year time for completing decommissioning and to clarify the use of engineered barriers for reactor entombments.^[5] At this time, however, the NRC's staff has recommended that rulemaking be deferred, based upon several factors including that no licensee has committed to pursuing the entombment option, the unresolved issues associated with the disposition of greater-than-Class C material (GTCC), and the NRC's current priorities, at least until after the

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additional research studies are complete. The Commission concurred with the staff's recommendation.

In 1996, the NRC published revisions to the general requirements for decommissioning nuclear power plants.^[6] When the decommissioning regulations were adopted in 1988, it was assumed that the majority of licensees would decommission at the end of the facility's operating licensed life. Since that time, several licensees permanently and prematurely ceased operations. Exemptions from certain operating requirements were required once the reactor was defueled to facilitate the decommissioning. Each case was handled individually, without clearly defined generic requirements. The NRC amended the decommissioning regulations in 1996 to clarify ambiguities and codify procedures and terminology as a means of enhancing efficiency and uniformity in the decommissioning process. The amendments allow for greater public participation and better define the transition process from operations to decommissioning.

Under the revised regulations, licensees will submit written certification to the NRC within 30 days after the decision to cease operations. Certification will also be required once the fuel is permanently removed from the reactor vessel. Submittal of these notices will entitle the licensee to a fee reduction and eliminate the obligation to follow certain requirements needed only during operation of the reactor. Within two years of submitting notice of permanent cessation of operations, the licensee is required to submit a Post-Shutdown Decommissioning Activities Report (PSDAR) to the NRC. The PSDAR describes the planned decommissioning activities, the associated sequence and schedule, and an estimate of expected costs. Prior to completing decommissioning, the licensee is required to submit an application to the NRC to terminate the license, which will include a license termination plan (LTP).

In 2011, the NRC published amended regulations to improve decommissioning planning and thereby reduce the likelihood that any current operating facility will become a legacy site.^[7] The amended regulations require licensees to conduct their operations to minimize the introduction of residual radioactivity into the site, which includes the site's subsurface soil and groundwater. Licensees also may be required to perform site surveys to determine whether residual radioactivity is present in subsurface areas and to keep records of these surveys with records important for decommissioning. The amended regulations require licensees to report additional details in their decommissioning cost estimate as well as requiring additional financial reporting and assurances. These additional details, including the ISFSI decommissioning estimate, are included in this analysis.

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1.3.1 High Level Waste

Congress passed the “Nuclear Waste Policy Act”^[8] (NWP) in 1982, assigning the federal government’s long-standing responsibility for disposal of the spent nuclear fuel created by the commercial nuclear generating plants to the DOE. The NWP provided that DOE would enter into contracts with utilities in which DOE would promise to take the utilities’ spent fuel and high level waste, and utilities would pay the cost of the disposition services for that material. NWP, along with the individual disposal contracts with the utilities, specified that the DOE was to begin accepting spent fuel by January 31, 1998.

Since the original legislation, the DOE has announced several delays in the program schedule. By January 1998, the DOE had failed to accept spent nuclear fuel or high level waste, as required by the NWP and utility contracts. Delays continue and, as a result, generators have initiated legal action against the DOE in an attempt to obtain compensation for DOE’s partial breach of contract. To date no spent fuel has been accepted from commercial generating sites for disposal.

Completion of the decommissioning process is dependent upon the DOE’s ability to remove spent fuel from the site in a timely manner. DOE’s repository program assumes that spent fuel allocations will be accepted for disposal from the nation’s commercial nuclear plants, with limited exceptions, in the order (the “queue”) in which it was discharged from the reactor. Xcel Energy’s current spent fuel management plan for the Monticello spent fuel assumed in this estimate is based in general upon: 1) a 2025 start date for DOE initiating transfer of commercial spent fuel to a federal facility (not necessarily a final repository), and 2) expectations for spent fuel receipt by the DOE for the Monticello fuel. The DOE’s generator allocation/receipt schedules are based upon the oldest fuel receiving the highest priority. Assuming a maximum rate of transfer of 3,000 metric tons of uranium (MTU)/year,^[9] the removal of spent fuel from the site is completed in 2066 (Scenario 1). Different DOE acceptance schedules result in different completion dates.

Today, the country is at an impasse on high-level waste disposal. The administration appointed a Blue Ribbon Commission on America’s Nuclear Future (Blue Ribbon Commission) to make recommendations for a new plan for nuclear waste disposal. The Blue Ribbon Commission’s charter includes a requirement that it consider “[o]ptions for safe storage of used nuclear fuel while final disposition pathways are selected and deployed.”^[10]

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On January 26, 2012, the Blue Ribbon Commission issued its “Report to the Secretary of Energy” containing a number of recommendations on nuclear waste disposal. Two of the recommendations that may impact decommissioning planning are:

- “[T]he United States [should] establish a program that leads to the timely development of one or more consolidated storage facilities”
- “[T]he United States should undertake an integrated nuclear waste management program that leads to the timely development of one or more permanent deep geological facilities for the safe disposal of spent fuel and high-level nuclear waste.”^[11]

In January 2013, the DOE issued the “Strategy for the Management and Disposal of Used Nuclear Fuel and High-Level Radioactive Waste,” in response to the recommendations made by the Blue Ribbon Commission and as “a framework for moving toward a sustainable program to deploy an integrated system capable of transporting, storing, and disposing of used nuclear fuel...”^[12] This document states:

“With the appropriate authorizations from Congress, the Administration currently plans to implement a program over the next 10 years that:

- Sites, designs and licenses, constructs and begins operations of a pilot interim storage facility by 2021 with an initial focus on accepting used nuclear fuel from shut-down reactor sites;
- Advances toward the siting and licensing of a larger interim storage facility to be available by 2025 that will have sufficient capacity to provide flexibility in the waste management system and allows for acceptance of enough used nuclear fuel to reduce expected government liabilities; and
- Makes demonstrable progress on the siting and characterization of repository sites to facilitate the availability of a geologic repository by 2048.”

The NRC’s review of DOE’s license application to construct a geologic repository at Yucca Mountain was suspended in 2011 when the Administration slashed the budget for completing that work. However, the US Court of Appeals for the District of Columbia Circuit in August 2013 issued a writ of mandamus^[13] ordering NRC to comply with federal law and restart its review of DOE’s Yucca Mountain repository license application to the extent of previously appropriated funding for the review. That review is now underway. The current schedule calls for completion

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and publication of the safety evaluation report by January 2015. The adjudicatory hearing, which must be completed before a licensing decision can be made, remains suspended.

In addition, the state of Minnesota directed the Public Utilities Commission, “when considering approval of a plan for the accrual of funds for the decommissioning of nuclear facilities” ...to “include an evaluation of the costs, if any, arising from storage of used nuclear fuel that may be incurred by the state of Minnesota, and any tribal community, county, city, or township where used nuclear fuel is located following the cessation of operations at a nuclear plant.”^[14]

The state of Minnesota statute also prescribed the parameters to be used in evaluating spent fuel management costs. “To assist the commission in making the determination ... the filing shall provide cost estimates, including ratepayer impacts, assuming used nuclear fuel will be stored in the state for 60 years, 100 years, and 200 years following the cessation of operation of the nuclear plant.”

Xcel Energy’s current spent fuel management plan for the Monticello spent fuel is based in general upon:

- 1) Fuel transferred from the pool to the ISFSI within 15 years of shutdown;
- 2) Exchange of Monticello and Prairie Island spent fuel acceptance rights to best manage the overall cost of spent fuel storage for both plants;
- 3) Fuel will be shipped in the existing NUHOMS DSCs (Scenarios 1 and 2); canisters that are unloaded in the spent fuel transfer operation (Scenarios 3 and 4) are assumed to be mildly neutron activated and therefore must be disposed of as radioactive waste, and
- 4) Availability of a DOE interim or permanent storage repository by 2025 (Scenario 1), 2049 (Scenario 2), 2089 (Scenario 3), or 2189 (Scenario 4). First shipment of fuel from the Monticello site occurs two years after DOE initial availability.

The NRC requires that licensees establish a program to manage and provide funding for the management of all irradiated fuel at the reactor site until title of the fuel is transferred to the Secretary of Energy, pursuant to 10 CFR Part 50.54(bb).^[15] This requirement is prepared for

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through inclusion of certain cost elements in the decommissioning estimates, for example, associated with the isolation and continued operation of the spent fuel pool and the ISFSI.

The spent fuel pool is expected to contain freshly discharged assemblies (from the most recent refueling cycles) as well as the final reactor cores at shutdown. Over the following fifteen years, the assemblies are packaged into DSCs for transfer to the ISFSI for interim storage. It is assumed that this period provides the necessary cooling for the final core to meet the storage requirements for decay heat.

An ISFSI, operated under a Part 50 General License (in accordance with 10 CFR 72, Subpart K^[16]), has been constructed to support continued plant operations. The facility is assumed to be expanded to support decommissioning. This will allow decommissioning activities to proceed within the auxiliary building.

The DOE has a contractual obligation to accept Monticello's fuel earlier than the projections set out above consistent with its contract commitments. No assumption made in this study should be interpreted to be inconsistent with this claim. However, at this time, including the cost of storing spent fuel in this study is appropriate, and ensures the availability of sufficient decommissioning funds if the DOE has not met its obligation.

1.3.2 Low-Level Radioactive Waste

The contaminated and neutron-activated material generated in the decontamination and dismantling of a commercial nuclear reactor is classified as low-level (radioactive) waste, although not all of the material is suitable for "shallow-land" disposal. With the passage of the "Low-Level Radioactive Waste Policy Act" in 1980,^[17] and its Amendments of 1985,^[18] the states became ultimately responsible for the disposition of low-level radioactive waste generated within their own borders. It was expected that groups of states would combine together to jointly deal with their radioactive wastes; these organizations are referred to as waste disposal compacts.

Few approved facilities for the disposal of LLW are currently available. Construction of the newest facility, in Texas, is now complete and the facility was declared operational by the operator, Waste Control Specialists (WCS), in November 2011. The facility will be able to accept limited

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quantities of non-Compact waste; however, at this time the cost for non-Compact generators is being negotiated on an individual basis.

All options and services currently available to Xcel Energy for disposition of the various waste streams produced by the decommissioning process were considered. The majority of the low-level radioactive waste designated for direct disposal (Class A^[19]) can be sent to EnergySolutions' facility in Clive, Utah. For the purpose of this analysis, Xcel Energy's "Utilities Service Alliance" agreement with EnergySolutions for offsite processing and disposal is used as the basis for estimating the disposal cost for the majority of the radioactive waste (i.e., Class A). EnergySolutions does not have a license to dispose of the more highly radioactive waste (Classes B and C), for example, generated in the dismantling of the reactor vessel.

The Texas facility is licensed to receive the higher activity waste forms (Classes B and C). As such, for this analysis, disposal costs for the Class B and C waste were based upon the preliminary and indicative information on the cost for such from WCS.

The dismantling of the components residing closest to the reactor core generates radioactive waste that may be considered unsuitable for shallow-land disposal (i.e., low-level radioactive waste with concentrations of radionuclides that exceed the limits established by the NRC for Class C radioactive waste (GTCC)). The Low-Level Radioactive Waste Policy Amendments Act of 1985 assigned the federal government the responsibility for the disposal of this material. The Act also stated that the beneficiaries of the activities resulting in the generation of such radioactive waste bear all reasonable costs of disposing of such waste. However, to date, the federal government has not identified a cost for disposing of GTCC or a schedule for acceptance.

For purposes of this analysis, the GTCC radioactive waste is assumed to be packaged and disposed of in a similar manner as the spent fuel and at a cost equivalent to that envisioned for the spent fuel. The GTCC is packaged in the same canisters used for spent fuel and either stored on site or shipped directly to a disposal facility as it is generated (depending upon the timing of the decommissioning and whether the spent fuel has been removed from the site prior to the start of decommissioning).

A significant portion of the waste material generated during decommissioning may only be potentially contaminated by radioactive

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materials. This waste can be analyzed on site or shipped off site to licensed facilities for further analysis, for processing and/or for conditioning/recovery. Reduction in the volume of low-level radioactive waste requiring disposal in a licensed low-level radioactive waste disposal facility can be accomplished through a variety of methods, including analyses and surveys or decontamination to eliminate the portion of waste that does not require disposal as radioactive waste, compaction, incineration or metal melt. The estimates for the Monticello station reflect the savings from waste recovery/volume reduction.

Material removed during decommissioning that is less than the site release criteria will be designated for conventional disposal or reuse / recovery.

1.3.3 Radiological Criteria for License Termination

In 1997, the NRC published Subpart E, “Radiological Criteria for License Termination,”^[20] amending 10 CFR Part 20. This subpart provides radiological criteria for releasing a facility for unrestricted use. The regulation states that the site can be released for unrestricted use if radioactivity levels are such that the average member of a critical group would not receive a Total Effective Dose Equivalent (TEDE) in excess of 25 millirem per year, and provided that residual radioactivity has been reduced to levels that are As Low As Reasonably Achievable (ALARA). The decommissioning estimates for the Monticello site assumed that it will be remediated to a residual level consistent with the NRC-prescribed level.

It should be noted that the NRC and the Environmental Protection Agency (EPA) differ on the amount of residual radioactivity considered acceptable in site remediation. The EPA has two limits that apply to radioactive materials. An EPA limit of 15 millirem per year is derived from criteria established by the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA or Superfund).^[21] An additional and separate limit of 4 millirem per year, as defined in 40 CFR §141.16, is applied to drinking water.^[22]

On October 9, 2002, the NRC signed an agreement with the EPA on the radiological decommissioning and decontamination of NRC-licensed sites. The Memorandum of Understanding (MOU)^[23] provides that EPA will defer exercise of authority under CERCLA for the majority of facilities decommissioned under NRC authority. The MOU also includes

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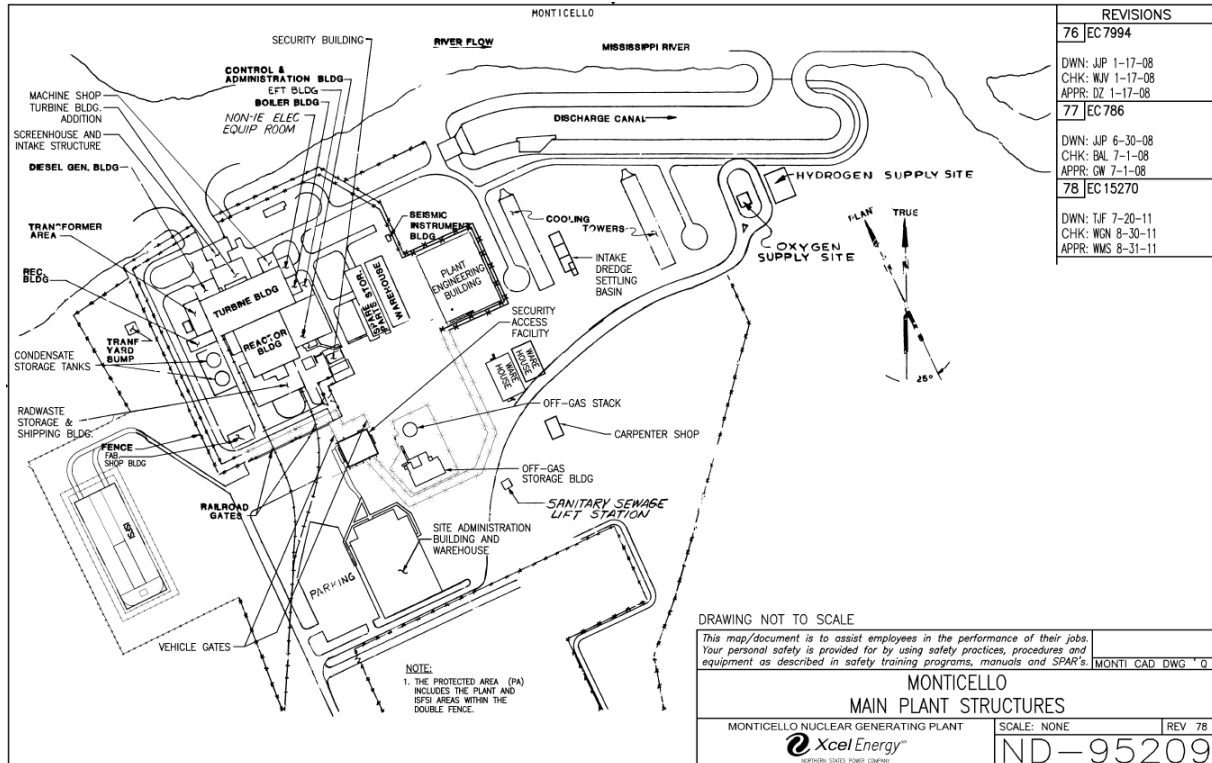
provisions for NRC and EPA consultation for certain sites when, at the time of license termination, (1) groundwater contamination exceeds EPA-permitted levels; (2) NRC contemplates restricted release of the site; and/or (3) residual radioactive soil concentrations exceed levels defined in the MOU.

The MOU does not impose any new requirements on NRC licensees and should reduce the involvement of the EPA with NRC licensees who are decommissioning. Most sites are expected to meet the NRC criteria for unrestricted use, and the NRC believes that only a few sites will have groundwater or soil contamination in excess of the levels specified in the MOU that trigger consultation with the EPA. However, if there are other hazardous materials on the site, the EPA may be involved in the cleanup. As such, the possibility of dual regulation remains for certain licensees. The present study does not include any costs for this occurrence.

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**FIGURE 1.1
MONTICELLO NUCLEAR GENERATING PLANT
GENERAL PLAN**



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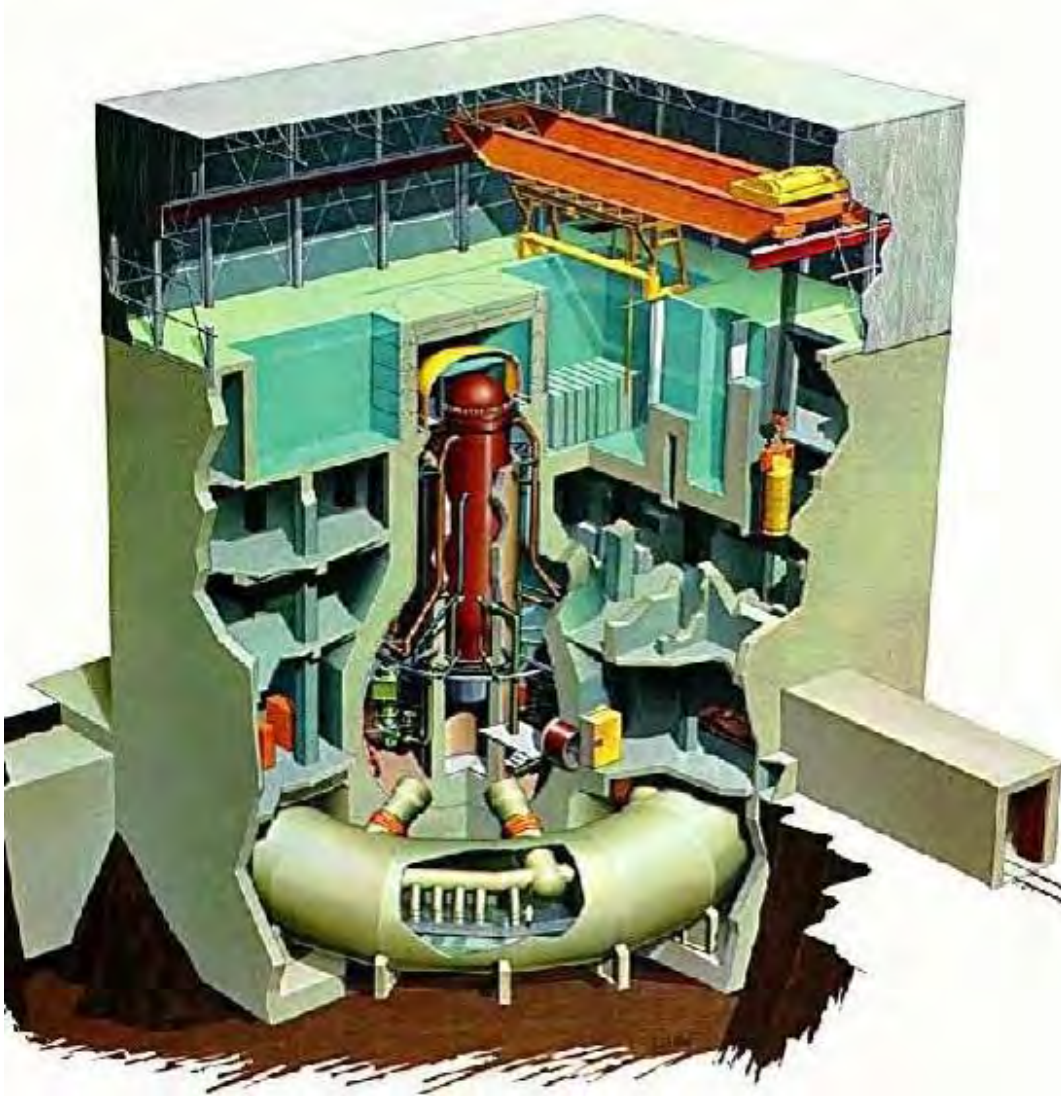
**FIGURE 1.2
MONTICELLO NUCLEAR GENERATING PLANT
AERIAL VIEW**



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**FIGURE 1.3
MONTICELLO NUCLEAR GENERATING PLANT
REACTOR BUILDING SECTION**



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2. DECOMMISSIONING ALTERNATIVE DESCRIPTION

Detailed cost estimates were developed to promptly decommission the Monticello station, (i.e., the DECON decommissioning alternative). The DECON alternative, as defined by the NRC, is "the alternative in which the equipment, structures, and portions of a facility and site containing radioactive contaminants are removed or decontaminated to a level that permits the property to be released for unrestricted use shortly after cessation of operations."

The following scenarios were evaluated and are intended to bound the liability associated with the removal of spent fuel from the site. The current operating license expires in 2030. In all four scenarios, decommissioning activities commence shortly after the cessation of plant operations. The spent fuel in the plant's spent fuel storage pool is transferred to the ISFSI within the first fifteen years. The equipment, structures, and portions of the plant containing radioactive contaminants are removed or decontaminated to a level that permits the facility to be released for unrestricted use. Non-essential structures are then demolished. Spent fuel storage operations continue at the site (at the ISFSI) until the transfer of the fuel to the DOE is completed (2066 in Scenario 1, 2090 in Scenario 2, 2130 in Scenario 3, and 2230 in Scenario 4).

Scenario	1 st Spent Fuel Canister Replacement	1 st Spent Fuel Assembly Removed from Monticello	Last Spent Fuel Assembly Removed from Monticello
1	n/a	2043	2066
2	n/a	2077	2090
3	2058	2117	2130
4	2058	2217	2230

The following sections describe the basic activities associated with the DECON alternative. Although detailed procedures for each activity identified are not provided, and the actual sequence of work may vary, the activity descriptions provide a basis not only for estimating but also for the expected scope of work (i.e., engineering and planning at the time of decommissioning).

The conceptual approach that the NRC has described in its regulations divides decommissioning into three phases. The initial phase commences with the effective date of permanent cessation of operations and involves the transition of both plant and licensee from reactor operations (i.e., power production) to facility de-activation and closure. During the first phase, notification is provided to the NRC certifying

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the permanent cessation of operations and the removal of fuel from the reactor vessel. The licensee is then prohibited from reactor operation.

The second phase encompasses activities during the storage period or during major decommissioning activities, or a combination of the two. The third phase pertains to the activities involved in license termination. The decommissioning estimates developed for Monticello are also divided into phases or periods; however, demarcation of the phases is based upon major milestones within the project or significant changes in the projected rate of expenditure.

2.1 PERIOD 1 - PREPARATIONS

In anticipation of the cessation of plant operations, detailed preparations are undertaken to provide a smooth transition from plant operations to site decommissioning. Through implementation of a staffing transition plan, the organization required to manage the intended decommissioning activities is assembled from available plant staff and outside resources. Preparations include the planning for permanent defueling of the reactor, revision of technical specifications applicable to the operating conditions and requirements, a characterization of the facility and major components, and the development of the PSDAR.

2.1.1 Engineering and Planning

The PSDAR, required within two years of the notice to cease operations, provides a description of the licensee's planned decommissioning activities, a timetable, and the associated financial requirements of the intended decommissioning program. Upon receipt of the PSDAR, the NRC will make the document available to the public for comment in a local hearing to be held in the vicinity of the reactor site. Ninety days following submittal and NRC receipt of the PSDAR, the licensee may begin to perform major decommissioning activities under a modified 10 CFR § Part 50.59 procedure (10 CFR §50.59 establishes the conditions under which licensees may make changes to the facility or procedures and conduct test or experiments, i.e., without prior NRC approval). Major activities are defined as any activity that results in permanent removal of major radioactive components, permanently modifies the structure of the containment, or results in dismantling components (for shipment) containing GTCC, as defined by 10 CFR §61. Major components are further defined as comprising the reactor vessel and internals, steam generators, large bore reactor coolant system piping, and other large components that are radioactive. The NRC includes the

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following additional criteria for use of the §50.59 process in decommissioning. The proposed activity must not:

- foreclose release of the site for possible unrestricted use,
- significantly increase decommissioning costs,
- cause any significant environmental impact, or
- violate the terms of the licensee's existing license.

Existing operational technical specifications are reviewed and modified to reflect plant conditions and the safety concerns associated with permanent cessation of operations. The environmental impact associated with the planned decommissioning activities is also considered. Typically, a licensee is not allowed to proceed if the consequences of a particular decommissioning activity are greater than that bounded by previously evaluated environmental assessments or impact statements. In this instance, the licensee must submit a license amendment for the specific activity and update the environmental report.

The decommissioning program outlined in the PSDAR is designed to accomplish the required tasks within the ALARA guidelines (as defined in 10 CFR Part 20) for protection of personnel from exposure to radiation hazards. It also addresses the continued protection of the health and safety of the public and the environment during the dismantling activity. Consequently, with the development of the PSDAR, activity specifications, cost-benefit and safety analyses, work packages, and procedures are assembled to support the proposed decontamination and dismantling activities.

2.1.2 Site Preparations

Following final plant shutdown, and in preparation for actual decommissioning activities, the following activities are initiated:

- Characterize the site and surrounding environs. This includes radiation surveys and sampling of the work areas, major components (including the reactor vessel and its internals), internal piping, and sacrificial shield.
- Isolate the spent fuel storage pool and fuel handling systems, such that decommissioning operations can commence on the balance of the plant. Decommissioning operations are scheduled around the fuel

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handling area to optimize the overall project schedule. The fuel is transferred from the pool once it decays to the point that it meets the heat load criteria of the storage/transport containers. Consequently, it is assumed that the fuel pool will remain operational for approximately fifteen years following the cessation of plant operations while the residual inventory is transferred to the ISFSI.

- Specify the transport and disposal requirements for activated materials and/or hazardous materials, including shielding and waste stabilization.
- Develop procedures for occupational exposure control, control and release of liquid and gaseous effluent, processing of radwaste (including dry-active waste, resins, filter media, metallic and non-metallic components generated in decommissioning), site security and emergency programs, and industrial safety.
- Perform chemical decontamination of the NSSS to reduce radiation levels in support of removal operations.

2.2 PERIOD 2 - DECOMMISSIONING OPERATIONS

This period includes the physical decommissioning activities associated with the removal and disposal of contaminated and activated components and structures, including the successful release of the site from the 10 CFR §50 operating license, exclusive of the ISFSI. Significant decommissioning activities in this phase include:

- Construct temporary facilities and/or modification of existing facilities to support dismantling activities. This may include a centralized processing area to facilitate equipment removal and component preparations for off-site disposal.
- Reconfigure and modify site structures and facilities as needed to support decommissioning operations. This may include the upgrading of roads (on- and off-site) to facilitate hauling and transport. Modifications may be required to the containment structure to facilitate access of large/heavy equipment. Modifications may also be required to the refueling area of the building to support the segmentation of the reactor vessel internals and component extraction.
- Design and fabricate temporary and permanent shielding to support removal and transportation activities, construction of contamination control envelopes, and the procurement of specialty tooling.

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- Procure (lease or purchase) of shipping canisters, cask liners, and industrial packages.
- Decontaminate components and piping systems as required to control (minimize) worker exposure.
- Remove piping and components no longer essential to support decommissioning operations.
- Transfer of the steam separator and dryer assemblies to the dryer-separator pool for segmentation. Segmentation by weight and activity maximizes the loading of the shielded transport casks. The operations are conducted under water using remotely operated tooling and contamination controls.
- Disconnection of the control blades from the drives on the vessel lower head. Blades are transferred to the spent fuel pool for packaging.
- Disassembly, segmentation, and packaging of the upper core grid.
- Disassembly, segmentation, and packaging of the core shroud and in-core guide tubes. Some of the material is expected to exceed Class C disposal requirements. As such, those segments are packaged in a modified fuel storage canister for geologic disposal.
- Disassembly and segmentation of the remaining reactor internals, including the jet pump assemblies, fuel support castings, and core plate assembly.
- Draining and decontamination of the reactor well and the permanent sealing of the spent fuel transfer gate. Install a shielded platform for segmentation of the reactor vessel. Cutting operations are performed in air using remotely operated equipment within a contamination control envelope. The water level is maintained just below the cut to minimize the working area dose rates. Sections are transferred to the dryer-separator pool for packaging and interim storage.
- Disconnection of the control rod drives and instrumentation tubes from reactor vessel lower head. The lower reactor head and vessel supporting structure are then segmented.
- Removal of the reactor recirculation pumps. Exterior surfaces are decontaminated and openings covered. Components can serve as their own burial containers provided that all penetrations are properly sealed and the internal contaminants are stabilized, e.g., with grout. Steel shielding will be added, as necessary, to those external areas of the package to meet transportation limits and regulations.

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- Segment the reactor vessel. A shielded platform is installed for segmentation as cutting operations are performed in air using remotely operated equipment within a contamination control envelope. The water level is maintained just below the cut to minimize the working area dose rates. Segments are transferred in-air to containers that are stored under water, for example, in an isolated area of the dryer-separator pool or the spent fuel pool.
- Demolition of the sacrificial shield activated concrete by controlled demolition.
- Expansion of the ISFSI and transfer of the spent fuel from the storage pool to the ISFSI pad for interim storage. Spent fuel storage operations continue throughout the active decommissioning period. Fuel transfer to DOE is expected to be completed by the end of the year 2066 (Scenario 1).

At least two years prior to the anticipated date of license termination, a LTP is required. Submitted as a supplement to the Final Safety Analysis Report (FSAR), or its equivalent, the plan must include: a site characterization, description of the remaining dismantling activities, plans for site remediation, procedures for the final radiation survey, designation of the end use of the site, an updated cost estimate to complete the decommissioning, and any associated environmental concerns. The NRC will notice the receipt of the plan, make the plan available for public comment, and schedule a local hearing. LTP approval will be subject to any conditions and limitations as deemed appropriate by the Commission. The licensee may then commence with the final remediation of site facilities and services, including:

- Removal of remaining plant systems and associated components as they become nonessential to the decommissioning program or worker health and safety (e.g., waste collection and treatment systems, electrical power and ventilation systems).
- Removal of the steel liners from dryer/separator pool and reactor well, disposing of the activated and contaminated sections as radioactive waste. Removal of any remaining activated/ contaminated concrete.
- Surveys of the decontaminated areas of the containment structure.
- Remediation and removal of the contaminated equipment and material from the radwaste and turbine buildings and any other contaminated facility. Radiation and contamination controls are utilized until residual levels indicate that the structures and equipment can be released for unrestricted access and conventional demolition. This activity may necessitate the dismantling and disposition of most of the systems and

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components (both clean and contaminated) located within these buildings. This activity facilitates surface decontamination and subsequent verification surveys required prior to obtaining release for demolition.

- Remove the remaining components, equipment, and plant services in support of the area release survey(s).
- Route material removed during the decontamination and dismantling to a central processing area. Material certified to be free of contamination is released for unrestricted disposition (e.g., as scrap, recycle, or for general disposal). Contaminated material is characterized and segregated for additional off-site processing (disassembly, chemical cleaning, volume reduction, and waste treatment), and/or packaged for controlled disposal at a low-level radioactive waste disposal facility.

Incorporated into the LTP is the Final Survey Plan. This plan identifies the radiological surveys to be performed once the decontamination activities are completed and is developed using the guidance provided in the “Multi-Agency Radiation Survey and Site Investigation Manual (MARSSIM).”^[24] This document incorporates the statistical approaches to survey design and data interpretation used by the EPA. It also identifies commercially available instrumentation and procedures for conducting radiological surveys. Use of this guidance ensures that the surveys are conducted in a manner that provides a high degree of confidence that applicable NRC criteria are satisfied. Once the survey is complete, the results are provided to the NRC in a format that can be verified. The NRC then reviews and evaluates the information, performs an independent confirmation of radiological site conditions, and makes a determination on the requested change to the operating license (that would release the property, exclusive of the ISFSI, for unrestricted use).

The NRC will amend the operating license if it determines that site remediation has been performed in accordance with the LTP, and that the terminal radiation survey and associated documentation demonstrate that the property (exclusive of the ISFSI) is suitable for release.

2.3 PERIOD 3 - SITE RESTORATION

Following completion of decommissioning operations, site restoration activities will begin. Efficient removal of the contaminated materials and verification that residual radionuclide concentrations are below the NRC limits may result in substantial damage to many of the structures. Although performed in a controlled, safe manner, blasting, coring, drilling, scarification (surface removal), and the other decontamination activities will substantially degrade

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power block structures including the reactor and radwaste buildings. Under certain circumstances, verifying that subsurface radionuclide concentrations meet NRC site release requirements will require removal of grade slabs and lower floors, potentially weakening footings and structural supports. This removal activity is necessary for those facilities and plant areas where historical records, when available, indicate the potential for radionuclides having been present in the soil, where system failures have been recorded, or where it is required to confirm that subsurface process and drain lines were not breached over the operating life of the station.

It is not currently anticipated that these structures would be repaired and preserved after the radiological contamination is removed. The cost to dismantle site structures with a work force already mobilized on site is more efficient than if the process is deferred. Site facilities quickly degrade without maintenance, adding additional expense and creating potential hazards to the public as well as to future workers. Abandonment creates a breeding ground for vermin infestation as well as other biological hazards.

This cost study presumes that non-essential structures and site facilities are dismantled as a continuation of the decommissioning activity. Foundations and exterior walls are removed to a nominal depth of three feet below grade. The three-foot depth allows for the placement of gravel for drainage, as well as topsoil, so that vegetation can be established for erosion control. Site areas affected by the dismantling activities are restored and the plant area graded as required to prevent ponding and inhibit the refloating of subsurface materials.

Non-contaminated concrete rubble produced by demolition activities is processed to remove reinforcing steel and miscellaneous embedments. The processed material is then used on site to backfill foundation voids. Excess non-contaminated materials are trucked to an off-site area for disposal as construction debris at no cost or credit to the decommissioning program.

2.4 ISFSI OPERATIONS AND DECOMMISSIONING

The ISFSI will continue to operate under the general license provisions of 10 CFR §72 following the amendment of the §50 operating license to release the adjacent (power block) property. Assuming the DOE begins to remove fuel from the Monticello site in 2043, the process is not expected to be completed until 2066 (Scenario 1). Any delay in the transfer process, for example, due to a delay in the scheduled opening of the geologic repository, a slower acceptance rate, or a combination of both, can result in a longer on-site residence time for the fuel discharge from the reactor, as well as additional caretaking expenses.

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Scenarios 2, 3 and 4 address an extended delay. Scenarios 3 and 4 also reflect an assumption that the spent fuel DSCs will need to be replaced every fifty years.

The assumed design for the ISFSI is based upon the use of a multi-purpose dry shielded storage canister and a horizontal storage module for pad storage.

In Scenarios 3 and 4, once the spent fuel has been removed from the original DSCs by Xcel Energy in the DSC replacement operation, the now-empty DSCs will be disposed of as low-level waste.

At the conclusion of the spent fuel transfer process, the ISFSI will be decommissioned. The Commission will terminate the license if it determines that the remediation of the ISFSI has been performed in accordance with an ISFSI license termination plan and that the final radiation survey and associated documentation demonstrate that the facility is suitable for release. Once the requirements are satisfied, the NRC can terminate the license for the ISFSI.

For purposes of this cost analysis, it is assumed that once the inner canisters containing the spent fuel assemblies have been removed, any required decontamination performed, and the license for the facility terminated, the horizontal storage modules remaining can be dismantled using conventional techniques for the demolition of reinforced concrete. The concrete storage pad will then be removed, and the area graded and landscaped to conform to the surrounding environment.

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3. COST ESTIMATE

The cost estimates prepared for decommissioning the Monticello station consider the unique features of the plant, including the nuclear steam supply system, electric power generating systems, support services, plant structures, and ancillary facilities. The basis of the estimates, including the sources of information relied upon, the estimating methodology employed, site-specific considerations, and other pertinent assumptions, is described in this section.

3.1 BASIS OF COST ESTIMATE

The analysis relies upon site-specific, technical information from an earlier evaluation prepared in 2011, updated to reflect current assumptions pertaining to the disposition of nuclear power plants and relevant industry experience in undertaking such projects. This information was reviewed for the current analysis and updated as deemed appropriate. The site-specific considerations and assumptions used in the previous evaluations were also revisited. Modifications were incorporated where new information was available or experience from ongoing decommissioning programs provided viable alternatives or improved processes.

3.2 METHODOLOGY

The methodology used to develop the estimates follows the basic approach originally presented in the AIF/NESP-036 study report, "Guidelines for Producing Commercial Nuclear Power Plant Decommissioning Cost Estimates,"^[25] and the DOE "Decommissioning Handbook."^[26] These documents present a unit factor method for estimating decommissioning activity costs, which simplifies the estimating calculations. Unit factors for concrete removal (\$/cubic yard), steel removal (\$/ton), and cutting costs (\$/inch) are developed using local labor rates. The activity-dependent costs are estimated with the item quantities (cubic yards and tons), developed from plant drawings and inventory documents. Removal rates and material costs for the conventional disposition of components and structures rely upon information available in the industry publication, "Building Construction Cost Data," published by R.S. Means.^[27]

The unit factor method provides a demonstrable basis for establishing a reliable cost estimate. The detail provided in the unit factors, including activity duration, labor costs (by craft), and equipment and consumable costs, ensures that essential elements have not been omitted. Appendix A presents the

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detailed development of a typical unit factor. Appendix B provides the values contained within one set of factors developed for this analysis.

This analysis reflects lessons learned from TLG's involvement in the Shippingport Station Decommissioning Project, completed in 1989, as well as the decommissioning of the Cintichem reactor, hot cells, and associated facilities, completed in 1997. In addition, the planning and engineering for the Pathfinder, Shoreham, Rancho Seco, Trojan, Yankee Rowe, Big Rock Point, Maine Yankee, Humboldt Bay-3, Oyster Creek, Connecticut Yankee, and San Onofre-1 nuclear units have provided additional insight into the process, the regulatory aspects, and the technical challenges of decommissioning commercial nuclear units.

Work Difficulty Factors

The estimates follow the principles of ALARA through the use of work duration adjustment factors. These factors address the impact of activities such as radiological protection instruction, mock-up training, and the use of respiratory protection and protective clothing. The factors lengthen a task's duration, increasing costs and lengthening the overall schedule. ALARA planning is considered in the costs for engineering and planning, and in the development of activity specifications and detailed procedures. Changes to worker exposure limits may impact the decommissioning cost and project schedule.

Work difficulty adjustment factors (WDFs) account for the inefficiencies in working in a power plant environment. The factors are assigned to each unique set of unit cost factors, commensurate with the inefficiencies associated with working in confined, hazardous environments. The ranges used for the WDFs are as follows:

• Access Factor	10% to 20%
• Respiratory Protection Factor	10% to 50%
• Radiation/ALARA Factor	10% to 37%
• Protective Clothing Factor	0% to 30%
• Work Break Factor	8.33%

The factors and their associated range of values were developed in conjunction with the AIF/NESP-036 study. The application of the factors is discussed in more detail in that publication.

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Scheduling Program Durations

The unit factors, adjusted by the WDFs as described above, are applied against the inventory of materials to be removed in the radiological controlled areas. The resulting labor-hours, or crew-hours, are used in the development of the decommissioning program schedule, using resource loading and event sequencing considerations. The scheduling of conventional removal and dismantling activities is based upon productivity information available from the "Building Construction Cost Data" publication. Dismantling of the fuel handling systems and decontamination of the spent fuel pool is also dependent upon the timetable for the transfer of the spent fuel assemblies from the pool to the ISFSI.

An activity duration critical path is used to determine the total decommissioning program schedule. The schedule is relied upon in calculating the carrying costs, which include program management, administration, field engineering, equipment rental, and support services such as quality control and security. This systematic approach for assembling decommissioning estimates ensures a high degree of confidence in the reliability of the resulting costs.

3.3 FINANCIAL COMPONENTS OF THE COST MODEL

TLG's proprietary decommissioning cost model, DECCER, produces a number of distinct cost elements. These direct expenditures, however, do not comprise the total cost to accomplish the project goal, i.e., license termination, spent fuel management and site restoration.

3.3.1 Contingency

Inherent in any cost estimate that does not rely on historical data is the inability to specify the precise source of costs imposed by factors such as tool breakage, accidents, illnesses, weather delays, and labor stoppages. In the DECCER cost model, contingency fulfills this role. Contingency is added to each line item to account for costs that are difficult or impossible to develop analytically. Such costs are historically inevitable over the duration of a job of this magnitude; therefore, this cost analysis includes funds to cover these types of expenses.

The activity- and period-dependent costs are combined to develop the total decommissioning cost. A contingency is then applied on a line-item basis, using one or more of the contingency types listed in the AIF/NESP-036 study. "Contingencies" are defined in the American

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Association of Cost Engineers “Project and Cost Engineers' Handbook”^[28] as "specific provision for unforeseeable elements of cost within the defined project scope; particularly important where previous experience relating estimates and actual costs has shown that unforeseeable events which will increase costs are likely to occur." The cost elements in this analysis are based upon ideal conditions and maximum efficiency; therefore, consistent with industry practice, contingency is included. In the AIF/NESP-036 study, the types of unforeseeable events that are likely to occur in decommissioning are discussed and guidelines are provided for a contingency percentage in each category. It should be noted that contingency, as used in this analysis, does not account for price escalation and inflation in the cost of decommissioning over the remaining operating life of the station.

Contingency funds are an integral part of the total cost to complete the decommissioning process. Exclusion of this component puts at risk a successful completion of the intended tasks and, potentially, subsequent related activities. For this study, TLG examined the major activity-related problems (decontamination, segmentation, equipment handling, packaging, transport, and waste disposal) that necessitate a contingency. Individual activity contingencies ranged from 0% to 75%, depending on the degree of difficulty judged to be appropriate from TLG's actual decommissioning experience. The contingency values used in this study are consistent with those developed in the AIF/NESP-036 study and are as follows:

• Decontamination	50%
• Contaminated Component Removal	25%
• Contaminated Component Packaging	10%
• Contaminated Component Transport	15%
• Low-Level Radioactive Waste Disposal	25%
• Low-Level Radioactive Waste Processing	15%
• Reactor Segmentation	75%
• Nuclear Steam Supply System Component Removal	25%
• Reactor Waste Packaging	25%
• Reactor Waste Transport	25%
• Reactor Vessel Component Disposal	50%
• Greater Than Class C Disposal	15%
• Non-Radioactive Component Removal	15%
• Heavy Equipment and Tooling	15%

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• Supplies	25%
• Engineering	15%
• Energy	15%
• Insurance, Property Taxes and Fees	10%
• Staffing	15%
• Characterization and Termination Surveys	30%
• Construction	15%
• Spent Fuel Capital Costs (Canisters and Overpacks)	15%
• Spent Fuel Transfer Costs	15%
• Operations and Maintenance Expenses	15%
• ISFSI Decommissioning	25%

The contingency values are applied to the appropriate components of the estimate on a line item basis. The composite contingency values for the four scenarios are reported at the end of each detailed estimate as provided in Appendices C through F.

3.3.2 Financial Risk

In addition to the routine uncertainties addressed by contingency, another cost element that is sometimes necessary to consider when bounding decommissioning costs relates to uncertainty, or risk. Examples can include changes in work scope, pricing, job performance, and other variations that could conceivably, but not necessarily, occur. Consideration is sometimes necessary to generate a level of confidence in the estimates, within a range of probabilities. TLG considers these types of costs under the broad term “financial risk.” Included within the category of financial risk are:

- Transition activities and costs: ancillary expenses associated with eliminating 50% to 80% of the site labor force shortly after the cessation of plant operations, added cost for worker separation packages throughout the decommissioning program, national or company-mandated retraining, and retention incentives for key personnel.
- Delays in approval of the decommissioning plan due to intervention, public participation in local community meetings, legal challenges, and national and local hearings.
- Changes in the project work scope from the baseline estimate, involving the discovery of unexpected levels of contaminants, contamination in places not previously expected, contaminated soil

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previously undiscovered (either radioactive or hazardous material contamination), variations in plant inventory or configuration not indicated by the as built drawings.

- Regulatory changes, for example, affecting worker health and safety, site release criteria, waste transportation, and disposal.
- Policy decisions altering national commitments (e.g., in the ability to accommodate certain waste forms for disposition), or in the timetable for such, for example, the start and rate of acceptance of spent fuel by the DOE.
- Pricing changes for basic inputs such as labor, energy, materials, and disposal. Items subject to widespread price competition (such as materials) may not show significant variation; however, others such as waste disposal could exhibit large pricing uncertainties, particularly in markets where limited access to services is available.

It has been TLG's experience that the results of a risk analysis, when compared with the base case estimate for decommissioning, indicate that the chances of the base decommissioning estimate's being too high is a low probability, and the chances that the estimate is too low is a higher probability. This is mostly due to the pricing uncertainty for low-level radioactive waste disposal, and to a lesser extent due to schedule increases from changes in plant conditions and to pricing variations in the cost of labor (both craft and staff). This cost study, however, does not add any additional costs to the estimates for financial risk, since there is insufficient historical data from which to project future liabilities. Consequently, the areas of uncertainty or risk should be revisited periodically and addressed through repeated revisions or updates of the base estimates.

3.4 SITE-SPECIFIC CONSIDERATIONS

There are a number of site-specific considerations that affect the method for dismantling and removal of equipment from the site and the degree of restoration required. The cost impact of the considerations identified below is included in this cost study.

3.4.1 Spent Fuel Management

The cost to dispose the spent fuel generated from plant operations is not reflected within the estimates to decommission the Monticello station. Ultimate disposition of the spent fuel is within the province of the DOE's

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Waste Management System, as defined by the Nuclear Waste Policy Act (the disposal cost is financed by a 1 mill/kWhr surcharge paid into the DOE's waste fund during operations). However, the NRC requires licensees to establish a program to manage and provide funding for the management of all irradiated fuel at the reactor until title of the fuel is transferred to the Secretary of Energy. This funding requirement is fulfilled through inclusion of certain high-level waste cost elements within the estimates, as described below.

Spent Fuel Management Model

Completion of the decommissioning process is dependent upon the DOE's ability to remove spent fuel from the site in a timely manner. DOE's repository program assumes that spent fuel allocations will be accepted for disposal from the nation's commercial nuclear plants, with limited exceptions, in the order (the "queue") in which it was discharged from the reactor. The DOE contracts provide mechanisms for altering the oldest fuel first allocation scheme, including emergency deliveries, exchanges of allocations amongst utilities and the option of providing priority acceptance from permanently shut down nuclear reactors. Because it is unclear how these mechanisms may operate once DOE begins accepting spent fuel from commercial reactors, this study assumes that DOE will accept spent fuel in an oldest fuel first order. The timing for removal of spent fuel from the site is based upon the DOE's most recently published annual acceptance rates of 400 MTU/year for year 1, 3,800 MTU total for years 2 through 4 and 3,000 MTU/year for year 5 and beyond.^[29]

Xcel Energy's current spent fuel management plan for the Monticello spent fuel is based in general upon:

- 1) Fuel transferred from the pool to the ISFSI within 15 years of shutdown;
- 2) Exchange of Monticello and Monticello spent fuel acceptance rights to best manage the overall cost of spent fuel storage for both plants;
- 3) Fuel will be shipped in the existing NUHOMs DSCs (Scenarios 1 and 2); DSCs that are unloaded in the spent fuel transfer operation (Scenarios 3 and 4) are assumed to be mildly neutron activated and therefore must be disposed of as radioactive waste, and

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- 4) Availability of a DOE interim or permanent storage repository by 2025 (Scenario 1), 2049 (Scenario 2), 2089 (Scenario 3), or 2189 (Scenario 4). First shipment of fuel from the Monticello site occurs two years after DOE initial availability.

ISFSI

This analysis assumes that the existing ISFSI is modified at the cessation of plant operations to accommodate the fuel present in the storage pool at shutdown.

Operation and maintenance costs for the spent fuel pool and ISFSI are included within the estimates and address the costs for staffing the facility, as well as security, insurance, and licensing fees. The estimates also include the costs to purchase, load, and transfer the NUHOMS DSCs from the pool to the ISFSI. Costs are also provided for the final disposition of the ISFSI once the transfer of the DSCs from the ISFSI to the DOE is complete.

Storage Canister Design

The design and capacity of the ISFSI is based upon the Transnuclear NUHOMS system (with a 61-fuel assembly capacity). The system consists of a multi-purpose (storage and transport) dry shielded storage canister (DSC) and a horizontal storage module (HSM).

Canister Loading and Transfer

The estimates include an average cost of \$1,377,000 for the labor to load/transport the spent fuel from the pool to the ISFSI pad. For estimating purposes an allowance of \$292,500 is used for the cost to transfer each fuel canister from the ISFSI to the DOE.

Operations and Maintenance

An annual cost (excluding labor) of approximately \$792,000 and \$96,000 are used for operation and maintenance of the spent fuel pool and the ISFSI, respectively.

At shutdown, the spent fuel pool is expected to contain freshly discharged assemblies (from the most recent refueling cycles). Over the next fifteen years the assemblies are packaged into DSCs for transfer to the ISFSI for transfer to the DOE. It is assumed that the fifteen years

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provides the necessary cooling period for the final core to meet the decay heat requirements for dry storage. Once the pool is emptied, the spent fuel storage and handling facilities are available for decommissioning.

Replacement of DSCs during ISFSI fuel storage period

Scenarios 1 and 2 do not assume any replacement of the spent fuel storage DSCs (recasking).

Two of the cost estimates, Scenarios 3 and 4, include costs to recask the spent fuel, based upon an assumption that the DSC has a limited lifetime of approximately 50 years.

Scenario 3, which is 100 years (nominally) in length, considers a single repackaging effort for each DSC in the ISFSI.

Scenario 4, which is a (nominal) 200 year scenario, assumes that when any DSC in the ISFSI reaches the 50 years of storage milestone, the DSC is replaced. In Scenario 4, the fuel will be recasked three times following final shutdown of Monticello.

Since the reactor building, spent fuel storage pool, and fuel handling facilities are removed by the year 2048, a dry fuel transfer facility is assumed to be constructed on site to perform the transfers from the old to the new DSCs. Scenarios 3 and 4 include the cost to construct such a transfer facility, as well as additional staffing positions for support of the dry transfer activities, and additional NRC oversight associated with the transfer operations. The decommissioning of this transfer facility is also included in Scenarios 3 and 4.

ISFSI Decommissioning

In accordance with 10 CFR §72.30, licensees must have a proposed decommissioning plan for the ISFSI site and facilities that includes a cost estimate to implement. The plan should contain sufficient information on the proposed practices and procedures for the decontamination of the ISFSI and for the disposal of residual radioactive materials after all spent fuel, high-level radioactive waste, and reactor-related GTCC waste have been removed.

Seven HSMs are assumed to have some level of neutron-induced activation as a result of the long-term storage of the fuel, i.e., to levels exceeding free-release limits. This allowance is equivalent to the number

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of HSMs required to accommodate the final core off load from Monticello. The cost of the disposition of this material is included in the estimate.

The ISFSI pad is not expected to be contaminated and will be demolished accordingly after a confirmation survey. For Scenarios 3 and 4, the dry fuel transfer facility constructed to support the spent fuel transfer operation has a small allowance for decontamination, and will be demolished after a confirmation survey.

The cost estimate for decommissioning the ISFSI reflects: 1) the cost of an independent contractor performing the decommissioning activities; 2) an adequate contingency factor; and 3) the cost of meeting the criteria for unrestricted use. The cost summary for decommissioning the ISFSI is presented in Appendix G. The demolition of the ISFSI for all four scenarios is reflected within the estimates which is included in the Site Restoration costs.

GTCC

The dismantling of the reactor internals is expected to generate radioactive waste considered unsuitable for shallow land disposal (i.e., GTCC waste). The Low-Level Radioactive Waste Policy Amendments Act of 1985 assigned the Federal Government the responsibility for the disposal of this material. The Act also stated that the beneficiaries of the activities resulting in the generation of such radioactive waste bear all reasonable costs of disposing of such waste. To date, the Federal Government has not identified a cost for disposal of GTCC or a schedule for acceptance. As such, the estimates to decommission the Monticello station include an allowance for the disposition of GTCC material.

For purposes of this study, GTCC is packaged in the same canisters used to store spent fuel. It is not anticipated that the DOE would accept this waste prior to completing the transfer of spent fuel. Therefore, until such time the DOE is ready to accept GTCC waste, it is reasonable to assume that this material remains in storage with the spent fuel at the ISFSI.

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3.4.2 Reactor Vessel and Internal Components

The reactor pressure vessel and internal components are segmented for disposal in shielded, reusable transportation casks. Segmentation is performed underwater in the dryer/separator pool, where a turntable and remote cutter are installed. The vessel is segmented in place, using a mast-mounted cutter supported off the lower head and directed from a shielded work platform installed overhead in the reactor well. Transportation cask specifications and transportation regulations will dictate segmentation and packaging methodology.

The dismantling of the reactor internals will generate radioactive waste considered unsuitable for shallow land disposal (i.e., GTCC). Although the material is not classified as high-level waste, federal regulations under the LLRW Policy Amendments Act specifies the GTCC LLWR is designated a federal responsibility under Section 3(b)(1)(D). However, the DOE has not been forthcoming with an acceptance criteria or disposition schedule for this material, and numerous questions remain as to the ultimate disposal cost and waste form requirements. As such, for purposes of this study, the GTCC has been packaged and disposed of in the same manner as high-level waste, at a cost equivalent to that envisioned for the spent fuel. This is consistent with the concept that the generator of GTCC waste will bear all reasonable costs of disposing of such wastes. [30]

Intact disposal of reactor vessel shells has been successfully demonstrated at several of the sites that have been decommissioned. Access to navigable waterways has allowed these large packages to be transported to the Barnwell disposal site with minimal overland travel. Intact disposal of the reactor vessel and internal components can provide savings in cost and worker exposure by eliminating the complex segmentation requirements, isolation of the GTCC material, and transport/storage of the resulting waste packages. Portland General Electric (PGE) was able to dispose of the Trojan reactor as an intact package (including the internals). However, its location on the Columbia River simplified the transportation analysis since:

- the reactor package could be secured to the transport vehicle for the entire journey, i.e., the package was not lifted during transport,

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- there were no man-made or natural terrain features between the plant site and the disposal location that could produce a large drop, and
- transport speeds were very low, limited by the overland transport vehicle and the river barge.

As a member of the Northwest Compact, PGE had a site available for disposal of the package - the US Ecology facility in Washington State. The characteristics of this arid site proved favorable in demonstrating compliance with land disposal regulations.

It is not known whether this option will be available when the Monticello station ceases operation. Future viability of this option will depend upon the ultimate location of the disposal site, as well as the disposal site licensee's ability to accept highly radioactive packages and effectively isolate them from the environment. As such, the estimates assume segmentation of the reactor vessel, as a bounding condition. With lower levels of activation, the vessel shell can be packaged more efficiently than the curie-limited internal components. This will allow the use of more conventional waste packages rather than shielded casks for transport.

3.4.3 Primary System Large Components

Reactor recirculation piping is cut from the reactor vessel once the water level in the vessel (used for personnel shielding during dismantling and cutting operations in and around the vessel) is dropped below the nozzle zone. The piping is boxed and transported by shielded van. The reactor recirculation pumps and motors are lifted out intact, packaged, and transported for processing and/or disposal.

3.4.4 Main Turbine and Condenser

The main turbine will be dismantled using conventional maintenance procedures. The turbine rotors and shafts will be removed to a laydown area. The lower turbine casings will be removed from their anchors by controlled demolition. The main condensers will also be disassembled and moved to a laydown area. Material is then prepared for transportation to an off-site recycling facility where it will be surveyed and designated for either decontamination or volume reduction, conventional disposal, or controlled disposal. Components will be

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packaged and readied for transport in accordance with the intended disposition.

3.4.5 Transportation Methods

Contaminated piping, components, and structural material other than the highly activated reactor vessel and internal components will qualify as LSA-I, II or III or Surface Contaminated Object, SCO-I or II, as described in Title 49.^[31] The contaminated material will be packaged in Industrial Packages (IP-1, IP-2, or IP-3, as defined in subpart 173.411) for transport unless demonstrated to qualify as their own shipping containers. The reactor vessel and internal components are expected to be transported in accordance with Part 71, in Type B containers. It is conceivable that the reactor, due to its limited specific activity, could qualify as LSA II or III. However, the high radiation levels on the outer surface would require that additional shielding be incorporated within the packaging so as to attenuate the dose to levels acceptable for transport.

Any fuel cladding failure that occurred during the lifetime of the plant is assumed to have released fission products at sufficiently low levels that the buildup of quantities of long-lived isotopes (e.g., ¹³⁷Cs, ⁹⁰Sr, or transuranics) has been prevented from reaching levels exceeding those that permit the major reactor components to be shipped under current transportation regulations and disposal requirements.

Transport of the highly activated metal, produced in the segmentation of the reactor vessel and internal components, will be by shielded truck cask. Cask shipments may exceed 95,000 pounds, including vessel segment(s), supplementary shielding, cask tie-downs, and tractor-trailer. The maximum level of activity per shipment assumed permissible was based upon the license limits of the available shielded transport casks. The segmentation scheme for the vessel and internal segments is designed to meet these limits.

The transport of large intact components (e.g., large heat exchangers and other oversized components) will be by a combination of truck, rail, and/or multi-wheeled transporter.

Transportation costs for Class A material requiring controlled disposal are based upon the mileage to the EnergySolutions facility in Clive, Utah. Class B and C wastes use the mileage to the Waste Control Specialists (WCS) facility in Andrews County, Texas. Transportation

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costs for off-site waste processing are based upon the mileage to Oak Ridge, Tennessee. Truck transport costs are estimated using published tariffs from Tri-State Motor Transit.^[32]

3.4.6 Low-Level Radioactive Waste Disposal

To the greatest extent practical, metallic material generated in the decontamination and dismantling processes is processed to reduce the total cost of controlled disposal. Material meeting the regulatory and/or site release criterion, is released as scrap, requiring no further cost consideration. Conditioning (preparing the material to meet the waste acceptance criteria of the disposal site) and recovery of the waste stream is performed off site at a licensed processing center. Any material leaving the site is subject to a survey and release charge, at a minimum. Based on TLG's experience, rates were assumed for off-site processing as well as survey and release.

The mass of radioactive waste generated during the various decommissioning activities at the site is shown on a line-item basis in the detailed Appendices C, D, E and F, and summarized in Tables 5.1, 5.2 and 5.3. The quantified waste summaries shown in these tables are consistent with 10 CFR Part 61 classifications. Commercially available steel containers are presumed to be used for the disposal of piping, small components, and concrete. Larger components can serve as their own containers, with proper closure of all openings, access ways, and penetrations. The volumes are calculated based on the exterior package dimensions for containerized material or a specific calculation for components serving as their own waste containers.

The more highly activated reactor components will be shipped in reusable, shielded truck casks with disposable liners. In calculating disposal costs, the burial fees are applied against the liner volume, as well as the special handling requirements of the payload. Packaging efficiencies are lower for the highly activated materials (greater than Class A waste), where high concentrations of gamma-emitting radionuclides limit the capacity of the shipping canisters.

Disposal fees are based upon estimated charges, with surcharges added for the highly activated components, such as those generated in the segmentation of the reactor vessel. The cost to dispose of the lowest level and majority of the material generated from the decontamination and dismantling activities is based upon Xcel Energy's current cost for disposal at EnergySolutions facility in Clive, Utah. Disposal costs for the

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higher activity waste (Class B and C) were based upon indicative information from WCS for the Andrews County facility.

3.4.7 Site Conditions Following Decommissioning

The NRC will amend or terminate the site license(s) if it determines that site remediation has been performed in accordance with the license termination plan, and that the terminal radiation survey and associated documentation demonstrate that the facility is suitable for release. The NRC's involvement in the decommissioning process typically ends at this point. Building codes and environmental regulations will dictate the next step in the decommissioning process, as well as the owner's own future plans for the site.

There are varying degrees to which the Monticello site can be restored following the decommissioning of the nuclear unit. The estimates presented herein include the dismantling of the major structures to just below ground level, backfilling and the collapsing of below grade voids, and general grading such that the site upon which the power block and supplemental structures are located is transformed into a "grassy plain." Xcel Energy has identified certain structures and site features that are candidates for reuse by a potential follow-on generating plant at the Monticello site. These structures are excluded from the scope of the estimates for decommissioning or site restoration.

Only existing site structures are considered in the dismantling cost. The electrical switchyard remains after Monticello is decommissioned in support of the regional transmission and distribution system. Structures are removed to a nominal depth of three feet below grade. The voids are backfilled with clean debris and capped with soil. The site is then re-graded to conform to the adjacent landscape. Vegetation is established to inhibit erosion. These "non-radiological costs" are included in the total cost of decommissioning.

Costs are included for the demolition of shoreline structures. Costs are not included for general restoration of the riverbank or restoration of the circulation water canals.

Bulk excavation of soil and material in the immediate vicinity of the reactor building is included to remove various duct banks, catch basins, and underground utilities that may exist.

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Concrete rubble generated from demolition activities is processed and made available as clean fill for the power block foundations. Additional clean fill is brought on site to backfill below grade voids as needed. The excavations will be regraded such that the power block area will have a final contour consistent with adjacent surroundings.

The estimates do not assume the remediation of any significant volume of contaminated soil. This assumption may be affected by continued plant operations and/or future regulatory actions, such as the development of site-specific release criteria.

3.5 ASSUMPTIONS

The following are the major assumptions made in the development of the estimates for decommissioning Monticello.

3.5.1 Estimating Basis

The study follows the principles of ALARA through the use of work duration adjustment factors. These factors address the impact of activities such as radiological protection instruction, mock-up training, and the use of respiratory protection and protective clothing. The factors lengthen a task's duration, increasing costs and lengthening the overall schedule. ALARA planning is considered in the costs for engineering and planning, and in the development of activity specifications and detailed procedures. Changes to worker exposure limits may impact the decommissioning cost and project schedule.

3.5.2 Labor Costs

Xcel Energy, as the operator, will continue to provide site operations support, including decommissioning program management, licensing, radiological protection, and site security. A Decommissioning Operations Contractor (DOC) will provide the supervisory staff needed to oversee the labor subcontractors, consultants, and specialty contractors needed to perform the work required for the decontamination and dismantling effort. The DOC will also provide the engineering services needed to develop activity specifications, detailed procedures, detailed activation analyses, and support field activities such as structural modifications.

Utility labor costs were provided by Xcel Energy. Average costs were provided by department or work group and included payroll overheads. Decommissioning Operations Contractor (DOC) labor costs were based

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on utility labor costs with modified markups to account for employee benefits, DOC overhead and profit.

The craft labor required to decontaminate and dismantle the Monticello station will be acquired through standard site contracting practices. Craft labor costs were based upon information from Xcel Energy. Craft labor costs include applicable overheads and profit.

Security, while reduced from operating levels, is maintained throughout the decommissioning for access control, material control, and to safeguard the spent fuel.

A profile of the staffing level for Scenario 1 decommissioning, including contractors and craft, is provided in Figure 3.1. Utility staffing levels will gradually decrease after completing the removal of physical systems at the station.

Staffing levels and management support will vary based upon the amount and type of decommissioning work. Craft manpower levels decrease after systems removal and structures decontamination and drop substantially during the delay period and the license termination survey period. However, craft staff levels increase again during the site restoration period due to the work associated with structures demolition.

3.5.3 Design Conditions

Any fuel cladding failure that occurred during the lifetime of the plant is assumed to have released fission products at sufficiently low levels that the buildup of quantities of long-lived isotopes (e.g., ¹³⁷Cs, ⁹⁰Sr, or transuranics) has been prevented from reaching levels exceeding those that permit the major NSSS components to be shipped under current transportation regulations and disposal requirements.

Activation levels in the vessel and internal components are modeled using NUREG/CR-3474.^[33] Estimates are derived from the curie/gram values contained therein and adjusted for the different mass of the Monticello components, projected operating life(s), and different periods of decay. Additional short-lived isotopes were derived from NUREG/CR-0130^[34] and NUREG/CR-0672^[35] and benchmarked to the long-lived values from CR-3474.

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The disposal cost for the control blades removed from the vessel with the final core load is included within the estimates. Control blade residence time in the reactor is assumed to be controlled such that the blades do not become GTCC material. Disposition of any blades stored in the pools from operations is considered an operating expense and therefore not accounted for in the estimates.

Activation of the reactor building is confined to the area around the sacrificial shield.

3.5.4 General

Transition Activities

Existing warehouses are cleared of non-essential material and remain for use by the plant operator and its subcontractors. The plant's operating staff performs the following activities at no additional cost or credit to the project during the transition period.

- Drain and collect fuel oils, lubricating oils, and transformer oils for recycle and/or sale.
- Drain and collect acids, caustics, and other chemical stores for recycle and/or sale.
- Process operating waste inventories. The estimates do not address the disposition of any legacy wastes and the disposal of operating wastes during this initial period is not considered a decommissioning expense.

Scrap and Salvage

The existing plant equipment is considered obsolete and suitable for scrap as deadweight quantities only. Xcel Energy will make economically reasonable efforts to salvage equipment following final plant shutdown. However, dismantling techniques assumed for equipment in this analysis are not consistent with removal techniques required for salvage (resale) of equipment. Experience has indicated that some buyers wanted equipment stripped down to very specific requirements before they would consider purchase. This required expensive rework after the equipment had been removed from its installed location. Since placing a salvage value on this machinery and equipment would be speculative, and the value would be small in comparison to the overall decommissioning expenses, this analysis does

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not attempt to quantify the value that an owner may realize based upon those efforts.

It is assumed, for purposes of this analysis, that any value received from the sale of scrap generated in the dismantling process would be more than offset by the on-site processing costs. The dismantling techniques assumed in the decommissioning estimates do not include the additional cost for size reduction and preparation to meet “furnace ready” conditions. For example, the recovery of copper from electrical cabling may require the removal and disposition of any contaminated insulation, an added expense. With a volatile market, the potential profit margin in scrap recovery is highly speculative, regardless of the ability to free release this material. This assumption is an implicit recognition of scrap value. An allowance has been included for the survey and release of all metallic material released from the site.

Furniture, tools, mobile equipment such as forklifts, trucks, bulldozers, and other property is removed at no cost or credit to the decommissioning project. Disposition may include relocation to other facilities. Spare parts are also made available for alternative use.

The concrete debris resulting from building demolition activities is crushed on site to reduce the size of the debris. The resulting crushed concrete is used to backfill below grade voids, with the excess assumed to be removed from the site as recycled material at no cost or credit to the decommissioning program. The rebar removed from the concrete crushing process is disposed of as scrap steel in a similar fashion as other scrap metal as discussed previously.

Insurance

Costs for continuing coverage (nuclear liability and property insurance) following cessation of plant operations and during decommissioning are included and based upon current operating premiums. Reductions in premiums, throughout the decommissioning process, are based upon the guidance provided in SECY-00-0145, “Integrated Rulemaking Plan for Nuclear Power Plant Decommissioning.”^[36] The NRC’s financial protection requirements are based on various reactor (and spent fuel) configurations.

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Xcel Energy Corporate Overhead

Corporate overhead charges for site support activities are not included in these estimates.

Site Non-Labor Overhead

These estimates include costs for site non-labor overhead charges. These costs include telephones, copy machines, computers, IT infrastructure, office supplies, janitorial supplies, training expenses, etc. Xcel Energy provided a two-part cost to address these costs. A variable charge of \$7,014 per person per year of the Xcel Energy staff is included throughout the estimate. A fixed annual overhead charge is also included, starting at \$2,435 thousand at the time of unit shut down and decreasing to approximately \$503 thousand.

Energy

For estimating purposes, the plant is assumed to be de-energized, with the exception of those facilities associated with spent fuel storage (temporary power is run throughout the plant, as needed). Replacement power costs are used to calculate the cost of energy consumed during decommissioning for tooling, lighting, ventilation, and essential services.

Taxes

Xcel Energy provided the basis for the structures and land taxes included within the estimates, including the reduction of these taxes over time.

NRC Fees

These estimates include charges from the NRC to support the Monticello decommissioning program. Charges are included for the yearly license held by Xcel Energy for the Part 50 license, as well as engineering support charges by the NRC to review activities at the site. The Part 50 license fee for a reactor in a decommissioning or possession-only status and which has spent fuel onsite is \$224 thousand per year. Once the reactor has been decommissioned, the site Part 72 license continues at the same fee until final removal of the spent fuel. The hourly rate for NRC review is \$279.00. The level of effort of NRC participation is commensurate with the decommissioning alternative and schedule; for example Scenario 2 has an estimated NRC support requirement of

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approximately 13,300 hours from shutdown until termination of the ISFSI license.

Emergency Planning Fees

These estimates include costs for emergency planning support activities. There are three separate civil emergency planning organizations assumed to be supporting Xcel Energy during the decommissioning program. The Federal Emergency Management Agency (FEMA) yearly fees are estimated at \$553,000 for the site from shutdown until approximately 18 months after each unit's shutdown, after which the FEMA fees are assumed to be eliminated.

Site Modifications

The perimeter fence and in-plant security barriers will be moved, as appropriate, to conform to the site security plan in force during the various stages of the project.

3.6 COST ESTIMATE SUMMARY

Schedules of expenditures are provided in Tables 3.1 through 3.4. The tables delineate the costs by year of expenditures as well as cost contributor (e.g., labor, equipment & materials, energy, radioactive waste disposal, and other costs).

The cost elements in Table 3.1 (Scenario 1) are also assigned to one of three subcategories: "License Termination," "Spent Fuel Management," and "Site Restoration." The subcategory "License Termination" is used to accumulate costs that are consistent with "decommissioning" as defined by the NRC in its financial assurance regulations (i.e., 10 CFR §50.75). In situations where the long-term management of spent fuel is not an issue, the cost reported for this subcategory is generally sufficient to terminate the unit's operating license, recognizing that there may be some additional cost impact from spent fuel management. Table 3.1a lists the License Termination subcategory schedule of expenditures.

The "Spent Fuel Management" subcategory contains costs associated with the containerization and transfer of spent fuel from the pool to an appropriate disposal facility or to the ISFSI for interim storage, and the transfer of the spent fuel canisters from the ISFSI. Costs are also included for the operations of the pool and the management of the ISFSI until such time that the transfer of all fuel from this facility to an off-site location (e.g., geologic repository) is

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complete. Table 3.1b lists the Spent Fuel Management subcategory schedule of expenditures.

“Site Restoration” is used to capture costs associated with the dismantling and demolition of buildings and facilities demonstrated to be free from contamination. This includes structures never exposed to radioactive materials, as well as those facilities that have been decontaminated to appropriate levels. Structures are removed to a depth of three feet and backfilled to conform to local grade. Table 3.1c lists the Site Restoration subcategory schedule of expenditures.

As discussed in Section 3.5.1, it is assumed that the DOE will not accept the GTCC waste prior to completing the transfer of spent fuel. Therefore, the cost of GTCC disposal is shown in the final year of ISFSI operation. While designated for disposal at the geologic repository along with the spent fuel, GTCC waste is still classified as low-level radioactive waste and, as such, included as a “License Termination” expense.

Table 3.2 presents Scenario 2 (60 years without cask replacement). Table 3.3 presents Scenario 3 (100 years with cask replacement). Table 3.4 presents Scenario 4 (200 years with cask replacement). The tables delineate the cost contributors by year of expenditures as well as cost contributor (e.g., labor, materials, and waste disposal).

Decommissioning costs are reported in 2014 dollars. Costs are not inflated, escalated, or discounted over the period of expenditure (or projected lifetime of the plant). The schedules are based upon the detailed activity costs reported in Appendices C through F, along with the timelines presented in Section 4.

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**TABLE 3.1
SCENARIO 1
MONTICELLO NUCLEAR GENERATING PLANT
SCHEDULE OF TOTAL ANNUAL EXPENDITURES**
(thousands, 2014 dollars)

Year	Labor	Equipment & Materials	Energy	Burial	Other	Total
2030	18,974	10,063	1,279	19	3,286	33,621
2031	62,013	27,009	5,339	1,241	18,173	113,776
2032	61,346	28,117	4,661	41,885	19,052	155,061
2033	55,908	23,767	3,456	29,792	12,841	125,764
2034	51,600	16,619	3,045	8,577	10,266	90,107
2035	43,414	19,813	2,445	6,285	9,312	81,270
2036	11,723	255	814	41	6,733	19,566
2037	11,691	254	812	41	6,714	19,512
2038	11,691	254	812	41	6,714	19,512
2039	11,691	254	812	41	6,714	19,512
2040	11,723	255	814	41	6,733	19,566
2041	11,691	254	812	41	6,714	19,512
2042	11,691	254	812	41	6,714	19,512
2043	11,860	759	812	41	6,714	20,185
2044	11,723	255	814	41	6,733	19,566
2045	28,226	28,482	1,068	6,395	7,324	71,494
2046	36,039	10,333	1,168	8,884	5,347	61,772
2047	21,046	7,385	484	9	2,318	31,241
2048	17,433	8,168	376	0	2,215	28,191
2049	3,909	0	0	0	2,186	6,095
2050	4,329	1,261	0	0	2,186	7,776
2051	3,909	0	0	0	2,186	6,095
2052	4,424	1,514	0	0	2,192	8,129
2053	4,329	1,261	0	0	2,186	7,776
2054	3,909	0	0	0	2,186	6,095
2055	4,329	1,261	0	0	2,186	7,776
2056	4,340	1,261	0	0	2,192	7,793
2057	3,909	0	0	0	2,186	6,095
2058	4,413	1,514	0	0	2,186	8,113
2059	3,909	0	0	0	2,186	6,095
2060	4,340	1,261	0	0	2,192	7,793
2061	3,909	0	0	0	2,186	6,095
2062	4,329	1,261	0	0	2,186	7,776

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TABLE 3.1 (continued)
SCENARIO 1
MONTICELLO NUCLEAR GENERATING PLANT
SCHEDULE OF TOTAL ANNUAL EXPENDITURES
(thousands, 2014 dollars)

Year	Labor	Equipment & Materials	Energy	Burial	Other	Total
2063	3,909	0	0	0	2,186	6,095
2064	4,340	1,261	0	0	2,192	7,793
2065	3,909	0	0	0	2,186	6,095
2066	4,073	2,333	0	28	9,984	16,418
2067	1,515	839	68	3,379	3,186	8,986
Total	577,519	197,579	30,702	106,859	200,969	1,113,628

Note: Columns may not add due to rounding

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**TABLE 3.1a
SCENARIO 1
MONTICELLO NUCLEAR GENERATING PLANT
SCHEDULE OF LICENSE TERMINATION EXPENDITURES**
(thousands, 2014 dollars)

Year	Labor	Equipment & Materials	Energy	Burial	Other	Total
2030	15,660	581	1,279	19	1,883	19,421
2031	54,552	6,394	5,339	1,241	13,721	81,247
2032	61,182	28,098	4,661	41,885	14,855	150,681
2033	54,179	18,598	3,456	29,792	8,855	114,880
2034	48,111	6,162	3,045	8,577	6,421	72,315
2035	37,050	4,576	2,445	6,285	5,468	55,823
2036	6,933	255	814	41	2,877	10,920
2037	6,914	254	812	41	2,869	10,891
2038	6,914	254	812	41	2,869	10,891
2039	6,914	254	812	41	2,869	10,891
2040	6,933	255	814	41	2,877	10,920
2041	6,914	254	812	41	2,869	10,891
2042	6,914	254	812	41	2,869	10,891
2043	6,914	254	812	41	2,869	10,891
2044	6,933	255	814	41	2,877	10,920
2045	16,184	2,174	1,068	6,395	3,766	29,586
2046	33,800	3,614	1,168	8,884	3,801	51,268
2047	6,197	284	156	9	443	7,089
2048	109	0	0	0	0	109
2049-65	0	0	0	0	0	0
2066	6	1,829	0	28	7,799	9,663
2067	777	98	0	3,379	3,009	7,264
Total	390,094	74,699	29,930	106,859	95,869	697,451

Note: Columns may not add due to rounding

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Decommissioning Cost Analysis**

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**TABLE 3.1b
SCENARIO 1
MONTICELLO NUCLEAR GENERATING PLANT
SCHEDULE OF SPENT FUEL MANAGEMENT EXPENDITURES
(thousands, 2014 dollars)**

Year	Labor	Equipment & Materials	Energy	Burial	Other	Total
2030	3,161	9,483	0	0	1,403	14,046
2031	6,872	20,615	0	0	4,453	31,939
2032	0	0	0	0	3,969	3,969
2033	1,719	5,157	0	0	3,845	10,721
2034	3,486	10,457	0	0	3,845	17,788
2035	6,362	15,237	0	0	3,845	25,443
2036	4,790	0	0	0	3,855	8,645
2037	4,777	0	0	0	3,845	8,622
2038	4,777	0	0	0	3,845	8,622
2039	4,777	0	0	0	3,845	8,622
2040	4,790	0	0	0	3,855	8,645
2041	4,777	0	0	0	3,845	8,622
2042	4,777	0	0	0	3,845	8,622
2043	4,945	505	0	0	3,845	9,294
2044	4,790	0	0	0	3,855	8,645
2045	12,041	26,308	0	0	3,558	41,908
2046	2,240	6,719	0	0	1,546	10,504
2047	3,183	1,515	0	0	1,718	6,416
2048	3,958	1,768	0	0	2,034	7,761
2049	3,909	0	0	0	2,186	6,095
2050	4,329	1,261	0	0	2,186	7,776
2051	3,909	0	0	0	2,186	6,095
2052	4,424	1,514	0	0	2,192	8,129
2053	4,329	1,261	0	0	2,186	7,776
2054	3,909	0	0	0	2,186	6,095
2055	4,329	1,261	0	0	2,186	7,776
2056	4,340	1,261	0	0	2,192	7,793
2057	3,909	0	0	0	2,186	6,095
2058	4,413	1,514	0	0	2,186	8,113
2059	3,909	0	0	0	2,186	6,095
2060	4,340	1,261	0	0	2,192	7,793
2061	3,909	0	0	0	2,186	6,095
2062	4,329	1,261	0	0	2,186	7,776
2063	3,909	0	0	0	2,186	6,095

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Decommissioning Cost Analysis**

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TABLE 3.1b (continued)
SCENARIO 1
MONTICELLO NUCLEAR GENERATING PLANT
SCHEDULE OF SPENT FUEL MANAGEMENT EXPENDITURES
(thousands, 2014 dollars)

Year	Labor	Equipment & Materials	Energy	Burial	Other	Total
2064	4,340	1,261	0	0	2,192	7,793
2065	3,909	0	0	0	2,186	6,095
2066	4,066	505	0	0	2,184	6,755
Total	160,732	110,124	0	0	104,215	375,071

Note: Columns may not add due to rounding

**Monticello Nuclear Generating Plant
Decommissioning Cost Analysis**

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**TABLE 3.1c
SCENARIO 1
MONTICELLO NUCLEAR GENERATING PLANT
SCHEDULE OF SITE RESTORATION EXPENDITURES**
(thousands, 2014 dollars)

Year	Labor	Equipment & Materials	Energy	Burial	Other	Total
2030	153	0	0	0	0	153
2031	589	0	0	0	0	589
2032	164	19	0	0	228	412
2033	10	12	0	0	142	163
2034	4	0	0	0	0	4
2035	3	0	0	0	0	3
2036-46						
2047	11,665	5,585	328	0	158	17,737
2048	13,366	6,400	376	0	181	20,322
2049-66						
2067	738	740	68	0	176	1,723
Total	26,693	12,757	772	0	884	41,106

Note: Columns may not add due to rounding

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**TABLE 3.2
SCENARIO 2
MONTICELLO NUCLEAR GENERATING PLANT
SCHEDULE OF TOTAL ANNUAL EXPENDITURES**
(thousands, 2014 dollars)

Year	Labor	Equipment & Materials	Energy	Burial	Other	Total
2030	18,104	7,454	1,279	19	3,286	30,142
2031	60,127	21,351	5,339	1,241	18,173	106,232
2032	61,361	28,164	4,661	41,885	19,052	155,123
2033	56,046	24,180	3,456	29,792	12,841	126,315
2034	51,864	17,410	3,045	8,577	10,266	91,162
2035	43,611	20,404	2,445	6,285	9,312	82,058
2036	11,739	301	814	41	6,733	19,627
2037	11,707	300	812	41	6,714	19,574
2038	11,707	300	812	41	6,714	19,574
2039	11,707	300	812	41	6,714	19,574
2040	11,739	301	814	41	6,733	19,627
2041	11,707	300	812	41	6,714	19,574
2042	11,707	300	812	41	6,714	19,574
2043	11,707	300	812	41	6,714	19,574
2044	11,739	301	814	41	6,733	19,627
2045	27,752	27,062	1,068	6,395	7,324	69,600
2046	35,679	9,251	1,168	8,884	5,347	60,329
2047	20,353	6,708	484	9	2,786	30,339
2048	16,672	7,495	376	0	2,738	27,282
2049	3,924	46	0	0	2,019	5,989
2050	6,097	6,564	0	0	2,019	14,680
2051	7,284	10,127	0	0	2,019	19,431
2052	5,316	4,189	0	0	2,025	11,529
2053	6,889	8,939	0	0	2,019	17,847
2054	8,076	12,502	0	0	2,019	22,597
2055	3,909	0	0	0	2,019	5,928
2056	3,920	0	0	0	2,025	5,944
2057	3,909	0	0	0	2,019	5,928
2058	3,909	0	0	0	2,019	5,928
2059	3,909	0	0	0	2,019	5,928
2060	3,920	0	0	0	2,025	5,944
2061	3,909	0	0	0	2,019	5,928
2062	3,909	0	0	0	2,019	5,928

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Decommissioning Cost Analysis**

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TABLE 3.2 (continued)
SCENARIO 2
MONTICELLO NUCLEAR GENERATING PLANT
SCHEDULE OF TOTAL ANNUAL EXPENDITURES
(thousands, 2014 dollars)

Year	Labor	Equipment & Materials	Energy	Burial	Other	Total
2063	3,909	0	0	0	2,019	5,928
2064	3,920	0	0	0	2,025	5,944
2065	3,909	0	0	0	2,019	5,928
2066	3,909	0	0	0	2,019	5,928
2067	3,909	0	0	0	2,019	5,928
2068	3,920	0	0	0	2,025	5,944
2069	3,909	0	0	0	2,019	5,928
2070	3,909	0	0	0	2,019	5,928
2071	3,909	0	0	0	2,019	5,928
2072	3,920	0	0	0	2,025	5,944
2073	3,909	0	0	0	2,019	5,928
2074	3,909	0	0	0	2,019	5,928
2075	3,909	0	0	0	2,019	5,928
2076	3,920	0	0	0	2,025	5,944
2077	4,077	505	0	0	2,285	6,866
2078	4,413	1,514	0	0	2,286	8,212
2079	4,329	1,261	0	0	2,286	7,876
2080	4,340	1,261	0	0	2,292	7,893
2081	4,329	1,261	0	0	2,286	7,876
2082	4,413	1,514	0	0	2,286	8,212
2083	4,329	1,261	0	0	2,286	7,876
2084	4,340	1,261	0	0	2,292	7,893
2085	4,329	1,261	0	0	2,286	7,876
2086	4,413	1,514	0	0	2,286	8,212
2087	4,329	1,261	0	0	2,286	7,876
2088	4,954	3,103	0	0	2,292	10,348
2089	4,329	1,261	0	0	2,286	7,876
2090	4,077	2,332	0	0	10,060	16,469
2091	1,533	840	68	3,407	3,217	9,064
Total	683,207	235,961	30,702	106,859	251,187	1,307,915

Note: Columns may not add due to rounding

**Monticello Nuclear Generating Plant
Decommissioning Cost Analysis**

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**TABLE 3.3
SCENARIO 3
MONTICELLO NUCLEAR GENERATING PLANT
SCHEDULE OF TOTAL ANNUAL EXPENDITURES**
(thousands, 2014 dollars)

Year	Labor	Equipment & Materials	Energy	Burial	Other	Total
2030	18,104	7,454	1,279	19	3,286	30,142
2031	60,127	21,351	5,339	1,241	18,173	106,232
2032	61,361	28,164	4,661	41,885	19,052	155,123
2033	56,046	24,180	3,456	29,792	12,841	126,315
2034	51,864	17,410	3,045	8,577	10,266	91,162
2035	43,611	20,404	2,445	6,285	9,312	82,058
2036	11,739	301	814	41	6,733	19,627
2037	11,707	300	812	41	6,714	19,574
2038	11,707	300	812	41	6,714	19,574
2039	11,707	300	812	41	6,714	19,574
2040	11,739	301	814	41	6,733	19,627
2041	11,707	300	812	41	6,714	19,574
2042	11,707	300	812	41	6,714	19,574
2043	11,707	300	812	41	6,714	19,574
2044	11,739	301	814	41	6,733	19,627
2045	27,752	27,062	1,068	6,395	7,324	69,600
2046	35,679	9,251	1,168	8,884	5,347	60,329
2047	20,375	6,775	484	9	2,786	30,429
2048	16,728	7,427	376	0	2,815	27,345
2049	4,939	46	0	0	3,016	8,001
2050	6,320	4,189	0	0	3,016	13,524
2051	6,320	4,189	0	0	3,016	13,524
2052	6,333	4,189	0	0	3,024	13,546
2053	6,320	4,189	0	0	3,016	13,524
2054	6,320	4,189	0	0	3,016	13,524
2055	6,320	4,189	0	0	3,016	13,524
2056	9,683	14,239	0	0	3,024	26,947
2057	6,320	4,189	0	0	3,016	13,524
2058	13,602	26,037	0	1,557	3,016	44,212
2059	6,320	4,189	0	0	3,016	13,524
2060	6,333	4,189	0	0	3,024	13,546
2061	6,320	4,189	0	0	3,016	13,524
2062	6,320	4,189	0	0	3,016	13,524

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Decommissioning Cost Analysis**

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TABLE 3.3 (continued)
SCENARIO 3
MONTICELLO NUCLEAR GENERATING PLANT
SCHEDULE OF TOTAL ANNUAL EXPENDITURES
(thousands, 2014 dollars)

Year	Labor	Equipment & Materials	Energy	Burial	Other	Total
2063	13,602	26,037	0	1,557	3,016	44,212
2064	6,333	4,189	0	0	3,024	13,546
2065	6,320	4,189	0	0	3,016	13,524
2066	13,602	26,037	0	1,557	3,016	44,212
2067	6,320	4,189	0	0	3,016	13,524
2068	6,333	4,189	0	0	3,024	13,546
2069	6,320	4,189	0	0	3,016	13,524
2070	6,320	4,189	0	0	3,016	13,524
2071	6,320	4,189	0	0	3,016	13,524
2072	6,333	4,189	0	0	3,024	13,546
2073	6,320	4,189	0	0	3,016	13,524
2074	6,320	4,189	0	0	3,016	13,524
2075	6,320	4,189	0	0	3,016	13,524
2076	6,333	4,189	0	0	3,024	13,546
2077	6,320	4,189	0	0	3,016	13,524
2078	6,320	4,189	0	0	3,016	13,524
2079	6,320	4,189	0	0	3,016	13,524
2080	13,616	26,037	0	1,557	3,024	44,234
2081	6,320	4,189	0	0	3,016	13,524
2082	6,320	4,189	0	0	3,016	13,524
2083	6,320	4,189	0	0	3,016	13,524
2084	6,333	4,189	0	0	3,024	13,546
2085	15,787	32,591	0	2,024	3,016	53,418
2086	6,320	4,189	0	0	3,016	13,524
2087	6,320	4,189	0	0	3,016	13,524
2088	6,947	6,030	0	0	3,024	16,001
2089	6,320	4,189	0	0	3,016	13,524
2090	6,320	4,189	0	0	3,016	13,524
2091	8,299	10,127	0	0	3,016	21,442
2092	6,333	4,189	0	0	3,024	13,546
2093	7,903	8,939	0	0	3,016	19,858
2094	9,091	12,502	0	0	3,016	24,609
2095	15,119	30,587	0	2,034	3,016	50,756

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Decommissioning Cost Analysis**

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TABLE 3.3 (continued)
SCENARIO 3
MONTICELLO NUCLEAR GENERATING PLANT
SCHEDULE OF TOTAL ANNUAL EXPENDITURES
(thousands, 2014 dollars)

Year	Labor	Equipment & Materials	Energy	Burial	Other	Total
2096	4,937	0	0	0	3,024	7,961
2097	4,923	0	0	0	3,016	7,939
2098	4,923	0	0	0	3,016	7,939
2099	4,923	0	0	0	3,016	7,939
2100	4,923	0	0	0	3,016	7,939
2101	4,923	0	0	0	3,016	7,939
2102	4,923	0	0	0	3,016	7,939
2103	4,923	0	0	0	3,016	7,939
2104	4,937	0	0	0	3,024	7,961
2105	4,923	0	0	0	3,016	7,939
2106	4,923	0	0	0	3,016	7,939
2107	4,923	0	0	0	3,016	7,939
2108	4,937	0	0	0	3,024	7,961
2109	4,923	0	0	0	3,016	7,939
2110	4,923	0	0	0	3,016	7,939
2111	4,923	0	0	0	3,016	7,939
2112	4,937	0	0	0	3,024	7,961
2113	4,923	0	0	0	3,016	7,939
2114	4,923	0	0	0	3,016	7,939
2115	4,923	0	0	0	3,016	7,939
2116	4,937	0	0	0	3,024	7,961
2117	4,077	505	0	0	2,286	6,867
2118	4,413	1,514	0	0	2,286	8,212
2119	4,329	1,261	0	0	2,286	7,876
2120	4,340	1,261	0	0	2,292	7,893
2121	4,329	1,261	0	0	2,286	7,876
2122	4,413	1,514	0	0	2,286	8,212
2123	4,329	1,261	0	0	2,286	7,876
2124	4,340	1,261	0	0	2,292	7,893
2125	4,329	1,261	0	0	2,286	7,876
2126	4,413	1,514	0	0	2,286	8,212
2127	4,329	1,261	0	0	2,286	7,876
2128	4,954	3,103	0	0	2,292	10,348

**Monticello Nuclear Generating Plant
Decommissioning Cost Analysis**

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TABLE 3.3 (continued)
SCENARIO 3
MONTICELLO NUCLEAR GENERATING PLANT
SCHEDULE OF TOTAL ANNUAL EXPENDITURES
(thousands, 2014 dollars)

Year	Labor	Equipment & Materials	Energy	Burial	Other	Total
2129	4,329	1,261	0	0	2,286	7,876
2130	4,077	2,332	0	0	10,060	16,469
2131	1,823	960	68	3,447	3,456	9,753
Total	1,016,876	559,535	30,702	117,186	400,136	2,124,434

Note: Columns may not add due to rounding

**Monticello Nuclear Generating Plant
Decommissioning Cost Analysis**

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**TABLE 3.4
SCENARIO 4
MONTICELLO NUCLEAR GENERATING PLANT
SCHEDULE OF TOTAL ANNUAL EXPENDITURES**
(thousands, 2014 dollars)

Year	Labor	Equipment & Materials	Energy	Burial	Other	Total
2030	18,104	7,454	1,279	19	3,286	30,142
2031	60,127	21,351	5,339	1,241	18,173	106,232
2032	61,361	28,164	4,661	41,885	19,052	155,123
2033	56,046	24,180	3,456	29,792	12,841	126,315
2034	51,864	17,410	3,045	8,577	10,266	91,162
2035	43,611	20,404	2,445	6,285	9,312	82,058
2036	11,739	301	814	41	6,733	19,627
2037	11,707	300	812	41	6,714	19,574
2038	11,707	300	812	41	6,714	19,574
2039	11,707	300	812	41	6,714	19,574
2040	11,739	301	814	41	6,733	19,627
2041	11,707	300	812	41	6,714	19,574
2042	11,707	300	812	41	6,714	19,574
2043	11,707	300	812	41	6,714	19,574
2044	11,739	301	814	41	6,733	19,627
2045	27,752	27,062	1,068	6,395	7,324	69,600
2046	35,679	9,251	1,168	8,884	5,347	60,329
2047	20,375	6,775	484	9	2,786	30,429
2048	16,888	7,427	376	0	2,739	27,431
2049	7,034	46	0	0	2,032	9,112
2050	8,415	4,189	0	0	2,032	14,636
2051	8,415	4,189	0	0	2,032	14,636
2052	8,434	4,189	0	0	2,038	14,661
2053	8,415	4,189	0	0	2,032	14,636
2054	8,415	4,189	0	0	2,032	14,636
2055	8,415	4,189	0	0	2,032	14,636
2056	11,784	14,239	0	0	2,038	28,062
2057	8,415	4,189	0	0	2,032	14,636
2058	15,698	26,037	0	1,555	2,032	45,322
2059	8,415	4,189	0	0	2,032	14,636
2060	8,434	4,189	0	0	2,038	14,661
2061	8,415	4,189	0	0	2,032	14,636
2062	8,415	4,189	0	0	2,032	14,636

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Decommissioning Cost Analysis**

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TABLE 3.4 (continued)
SCENARIO 4
MONTICELLO NUCLEAR GENERATING PLANT
SCHEDULE OF TOTAL ANNUAL EXPENDITURES
(thousands, 2014 dollars)

Year	Labor	Equipment & Materials	Energy	Burial	Other	Total
2063	15,698	26,037	0	1,555	2,032	45,322
2064	8,434	4,189	0	0	2,038	14,661
2065	8,415	4,189	0	0	2,032	14,636
2066	15,698	26,037	0	1,555	2,032	45,322
2067	8,415	4,189	0	0	2,032	14,636
2068	8,434	4,189	0	0	2,038	14,661
2069	8,415	4,189	0	0	2,032	14,636
2070	8,415	4,189	0	0	2,032	14,636
2071	8,415	4,189	0	0	2,032	14,636
2072	8,434	4,189	0	0	2,038	14,661
2073	8,415	4,189	0	0	2,032	14,636
2074	8,415	4,189	0	0	2,032	14,636
2075	8,415	4,189	0	0	2,032	14,636
2076	8,434	4,189	0	0	2,038	14,661
2077	8,415	4,189	0	0	2,032	14,636
2078	8,415	4,189	0	0	2,032	14,636
2079	8,415	4,189	0	0	2,032	14,636
2080	15,717	26,037	0	1,555	2,038	45,347
2081	8,415	4,189	0	0	2,032	14,636
2082	8,415	4,189	0	0	2,032	14,636
2083	8,415	4,189	0	0	2,032	14,636
2084	8,434	4,189	0	0	2,038	14,661
2085	17,883	32,591	0	2,022	2,032	54,528
2086	8,415	4,189	0	0	2,032	14,636
2087	8,415	4,189	0	0	2,032	14,636
2088	9,048	6,030	0	0	2,038	17,116
2089	8,415	4,189	0	0	2,032	14,636
2090	8,415	4,189	0	0	2,032	14,636
2091	8,415	4,189	0	0	2,032	14,636
2092	8,434	4,189	0	0	2,038	14,661
2093	8,415	4,189	0	0	2,032	14,636
2094	8,415	4,189	0	0	2,032	14,636
2095	18,611	34,776	0	2,032	2,032	57,451

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TABLE 3.4 (continued)
SCENARIO 4
MONTICELLO NUCLEAR GENERATING PLANT
SCHEDULE OF TOTAL ANNUAL EXPENDITURES
(thousands, 2014 dollars)

Year	Labor	Equipment & Materials	Energy	Burial	Other	Total
2096	8,434	4,189	0	0	2,038	14,661
2097	8,415	4,189	0	0	2,032	14,636
2098	8,415	4,189	0	0	2,032	14,636
2099	8,415	4,189	0	0	2,032	14,636
2100	8,415	4,189	0	0	2,032	14,636
2101	8,415	4,189	0	0	2,032	14,636
2102	8,415	4,189	0	0	2,032	14,636
2103	8,415	4,189	0	0	2,032	14,636
2104	8,434	4,189	0	0	2,038	14,661
2105	8,415	4,189	0	0	2,032	14,636
2106	8,415	4,189	0	0	2,032	14,636
2107	8,415	4,189	0	0	2,032	14,636
2108	15,717	26,037	0	1,555	2,038	45,347
2109	8,415	4,189	0	0	2,032	14,636
2110	8,415	4,189	0	0	2,032	14,636
2111	8,415	4,189	0	0	2,032	14,636
2112	8,434	4,189	0	0	2,038	14,661
2113	15,698	26,037	0	1,555	2,032	45,322
2114	8,415	4,189	0	0	2,032	14,636
2115	8,415	4,189	0	0	2,032	14,636
2116	15,717	26,037	0	1,555	2,038	45,347
2117	8,415	4,189	0	0	2,032	14,636
2118	8,415	4,189	0	0	2,032	14,636
2119	8,415	4,189	0	0	2,032	14,636
2120	8,434	4,189	0	0	2,038	14,661
2121	8,415	4,189	0	0	2,032	14,636
2122	8,415	4,189	0	0	2,032	14,636
2123	8,415	4,189	0	0	2,032	14,636
2124	8,434	4,189	0	0	2,038	14,661
2125	8,415	4,189	0	0	2,032	14,636
2126	8,415	4,189	0	0	2,032	14,636
2127	8,415	4,189	0	0	2,032	14,636
2128	9,048	6,030	0	0	2,038	17,116

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TABLE 3.4 (continued)
SCENARIO 4
MONTICELLO NUCLEAR GENERATING PLANT
SCHEDULE OF TOTAL ANNUAL EXPENDITURES
(thousands, 2014 dollars)

Year	Labor	Equipment & Materials	Energy	Burial	Other	Total
2129	8,415	4,189	0	0	2,032	14,636
2130	15,698	26,037	0	1,555	2,032	45,322
2131	8,415	4,189	0	0	2,032	14,636
2132	8,434	4,189	0	0	2,038	14,661
2133	8,415	4,189	0	0	2,032	14,636
2134	8,415	4,189	0	0	2,032	14,636
2135	17,883	32,591	0	2,022	2,032	54,528
2136	8,434	4,189	0	0	2,038	14,661
2137	8,415	4,189	0	0	2,032	14,636
2138	8,415	4,189	0	0	2,032	14,636
2139	8,415	4,189	0	0	2,032	14,636
2140	8,434	4,189	0	0	2,038	14,661
2141	8,415	4,189	0	0	2,032	14,636
2142	8,415	4,189	0	0	2,032	14,636
2143	8,415	4,189	0	0	2,032	14,636
2144	8,434	4,189	0	0	2,038	14,661
2145	18,611	34,776	0	2,032	2,032	57,451
2146	8,415	4,189	0	0	2,032	14,636
2147	8,415	4,189	0	0	2,032	14,636
2148	8,434	4,189	0	0	2,038	14,661
2149	8,415	4,189	0	0	2,032	14,636
2150	8,415	4,189	0	0	2,032	14,636
2151	8,415	4,189	0	0	2,032	14,636
2152	8,434	4,189	0	0	2,038	14,661
2153	8,415	4,189	0	0	2,032	14,636
2154	8,415	4,189	0	0	2,032	14,636
2155	8,415	4,189	0	0	2,032	14,636
2156	8,434	4,189	0	0	2,038	14,661
2157	8,415	4,189	0	0	2,032	14,636
2158	15,698	26,037	0	1,555	2,032	45,322
2159	8,415	4,189	0	0	2,032	14,636
2160	8,434	4,189	0	0	2,038	14,661
2161	8,415	4,189	0	0	2,032	14,636

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TABLE 3.4 (continued)
SCENARIO 4
MONTICELLO NUCLEAR GENERATING PLANT
SCHEDULE OF TOTAL ANNUAL EXPENDITURES
(thousands, 2014 dollars)

Year	Labor	Equipment & Materials	Energy	Burial	Other	Total
2162	8,415	4,189	0	0	2,032	14,636
2163	15,698	26,037	0	1,555	2,032	45,322
2164	8,434	4,189	0	0	2,038	14,661
2165	8,415	4,189	0	0	2,032	14,636
2166	15,698	26,037	0	1,555	2,032	45,322
2167	8,415	4,189	0	0	2,032	14,636
2168	9,048	6,030	0	0	2,038	17,116
2169	8,415	4,189	0	0	2,032	14,636
2170	8,415	4,189	0	0	2,032	14,636
2171	8,415	4,189	0	0	2,032	14,636
2172	8,434	4,189	0	0	2,038	14,661
2173	8,415	4,189	0	0	2,032	14,636
2174	8,415	4,189	0	0	2,032	14,636
2175	8,415	4,189	0	0	2,032	14,636
2176	8,434	4,189	0	0	2,038	14,661
2177	8,415	4,189	0	0	2,032	14,636
2178	8,415	4,189	0	0	2,032	14,636
2179	8,415	4,189	0	0	2,032	14,636
2180	15,717	26,037	0	1,555	2,038	45,347
2181	8,415	4,189	0	0	2,032	14,636
2182	8,415	4,189	0	0	2,032	14,636
2183	8,415	4,189	0	0	2,032	14,636
2184	8,434	4,189	0	0	2,038	14,661
2185	17,883	32,591	0	2,022	2,032	54,528
2186	8,415	4,189	0	0	2,032	14,636
2187	8,415	4,189	0	0	2,032	14,636
2188	8,434	4,189	0	0	2,038	14,661
2189	8,415	4,189	0	0	2,032	14,636
2190	9,207	6,564	0	0	2,032	17,803
2191	10,394	10,127	0	0	2,032	22,554
2192	8,434	4,189	0	0	2,038	14,661
2193	9,999	8,939	0	0	2,032	20,970
2194	11,186	12,502	0	0	2,032	25,721

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TABLE 3.4 (continued)
SCENARIO 4
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SCHEDULE OF TOTAL ANNUAL EXPENDITURES
(thousands, 2014 dollars)

Year	Labor	Equipment & Materials	Energy	Burial	Other	Total
2195	17,215	30,587	0	2,032	2,032	51,866
2196	7,038	0	0	0	2,038	9,076
2197	7,019	0	0	0	2,032	9,051
2198	7,019	0	0	0	2,032	9,051
2199	7,019	0	0	0	2,032	9,051
2200	7,019	0	0	0	2,032	9,051
2201	7,019	0	0	0	2,032	9,051
2202	7,019	0	0	0	2,032	9,051
2203	7,019	0	0	0	2,032	9,051
2204	7,038	0	0	0	2,038	9,076
2205	7,019	0	0	0	2,032	9,051
2206	7,019	0	0	0	2,032	9,051
2207	7,019	0	0	0	2,032	9,051
2208	14,934	23,689	0	1,555	2,038	42,217
2209	7,019	0	0	0	2,032	9,051
2210	7,019	0	0	0	2,032	9,051
2211	7,019	0	0	0	2,032	9,051
2212	7,038	0	0	0	2,038	9,076
2213	14,301	21,848	0	1,555	2,032	39,737
2214	7,019	0	0	0	2,032	9,051
2215	7,019	0	0	0	2,032	9,051
2216	7,038	0	0	0	2,038	9,076
2217	4,077	505	0	0	2,286	6,867
2218	4,413	1,514	0	0	2,286	8,212
2219	4,329	1,261	0	0	2,286	7,876
2220	4,340	1,261	0	0	2,292	7,893
2221	4,329	1,261	0	0	2,286	7,876
2222	4,413	1,514	0	0	2,286	8,212
2223	4,329	1,261	0	0	2,286	7,876
2224	4,340	1,261	0	0	2,292	7,893
2225	4,329	1,261	0	0	2,286	7,876
2226	4,413	1,514	0	0	2,286	8,212
2227	4,329	1,261	0	0	2,286	7,876

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TABLE 3.4 (continued)
SCENARIO 4
MONTICELLO NUCLEAR GENERATING PLANT
SCHEDULE OF TOTAL ANNUAL EXPENDITURES
(thousands, 2014 dollars)

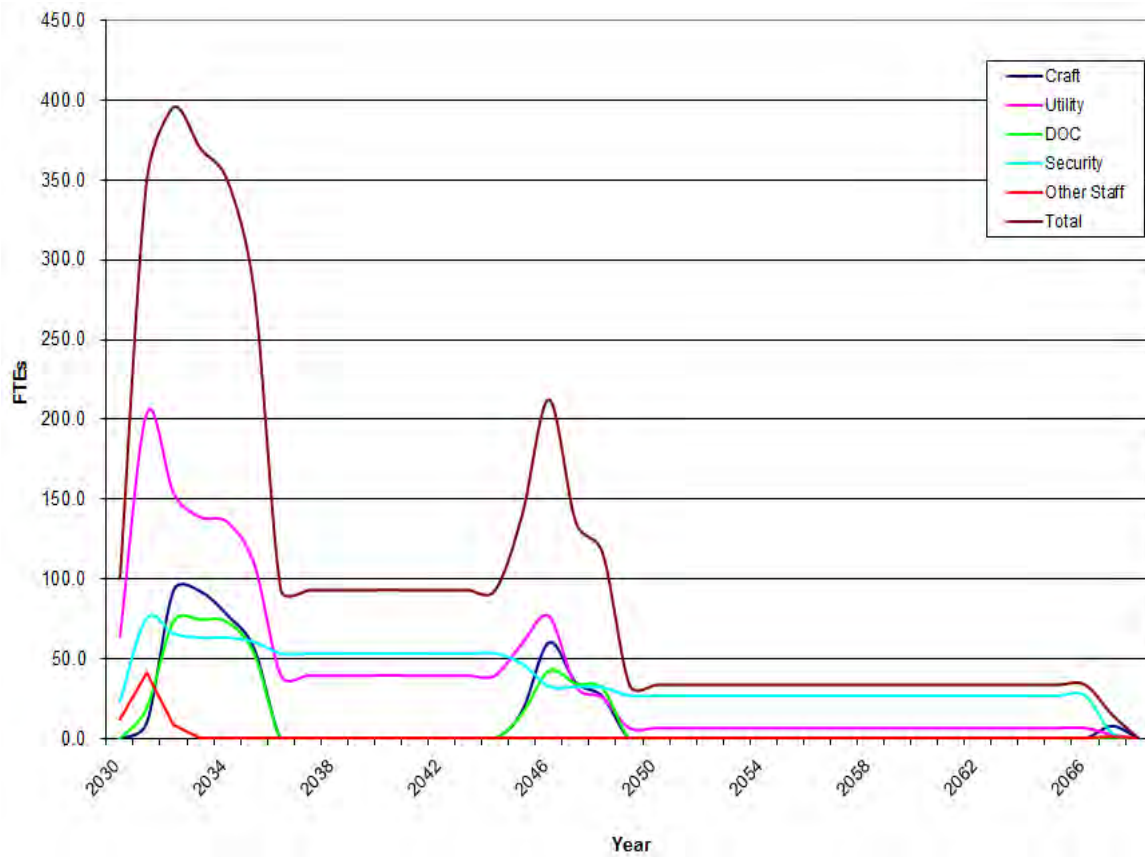
Year	Labor	Equipment & Materials	Energy	Burial	Other	Total
2228	4,340	1,261	0	0	2,292	7,893
2229	4,329	1,261	0	0	2,286	7,876
2230	4,077	2,332	0	0	10,060	16,469
2231	1,823	960	68	3,447	3,455	9,753
Total	2,115,755	1,320,942	30,702	140,829	536,503	4,144,731

Note: Columns may not add due to rounding

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**FIGURE 3.1
SCENARIO 1
MONTICELLO NUCLEAR GENERATING PLANT
MANPOWER LEVELS**



4. SCHEDULE ESTIMATE

The schedule for the decommissioning scenario considered in this study follows the sequence presented in the AIF/NESP-036 study, with minor changes to reflect recent experience and site-specific constraints. In addition, the scheduling has been revised to reflect the spent fuel management plan described in Section 3.5.1.

A schedule or sequence of activities for the DECON alternative (without the post-decommissioning ISFSI operating period) is presented in Figure 4.1. The scheduling sequence assumes that fuel is removed from the spent fuel pool approximately fifteen years following the permanent cessation of plant operations. The key activities listed in the schedule do not reflect a one-to-one correspondence with those activities in the cost table, but reflect dividing some activities for clarity and combining others for convenience. The schedule was prepared using the "Microsoft Project Professional 2010" computer software.^[37]

4.1 SCHEDULE ESTIMATE ASSUMPTIONS

The schedule reflects the results of a precedence network developed for the site decommissioning activities, i.e., a PERT (Program Evaluation and Review Technique) Software Package. The work activity durations used in the precedence network reflect the actual man-hour estimates from the cost table, adjusted by stretching certain activities over their slack range and shifting the start and end dates of others. The following assumptions were made in the development of the decommissioning schedule:

- The fuel handling area of the reactor building is isolated until such time that all spent fuel has been discharged from the spent fuel pool to the ISFSI. Decontamination and dismantling of the storage pool is initiated once the transfer of spent fuel is complete.
- All work (except vessel and internals removal) is performed during an 8-hour workday, 5 days per week, with no overtime. There are eleven paid holidays per year.
- Reactor and internals removal activities are performed by using separate crews for different activities working on different shifts, with a corresponding backshift charge for the second shift.
- Multiple crews work parallel activities to the maximum extent possible, consistent with optimum efficiency, adequate access for cutting, removal and laydown space, and with the stringent safety measures necessary during demolition of heavy components and structures.

- For plant systems removal, the systems with the longest removal durations in areas on the critical path are considered to determine the duration of the activity.

4.2 PROJECT SCHEDULE

The period-dependent costs presented in Appendices C through F are based upon the durations developed in the schedules for decommissioning. Durations are established between several milestones in each project period; these durations are used to establish a critical path for the entire project. In turn, the critical path duration for each period is used as the basis for determining the period-dependent costs.

Project timelines are provided in Figures 4.2 through 4.4, with milestone dates based on the anticipated shutdown date. The fuel pool is emptied approximately fifteen years after shutdown, while ISFSI operations continue until all spent fuel has been transferred to an appropriate disposal facility.

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**FIGURE 4.1
ACTIVITY SCHEDULE**

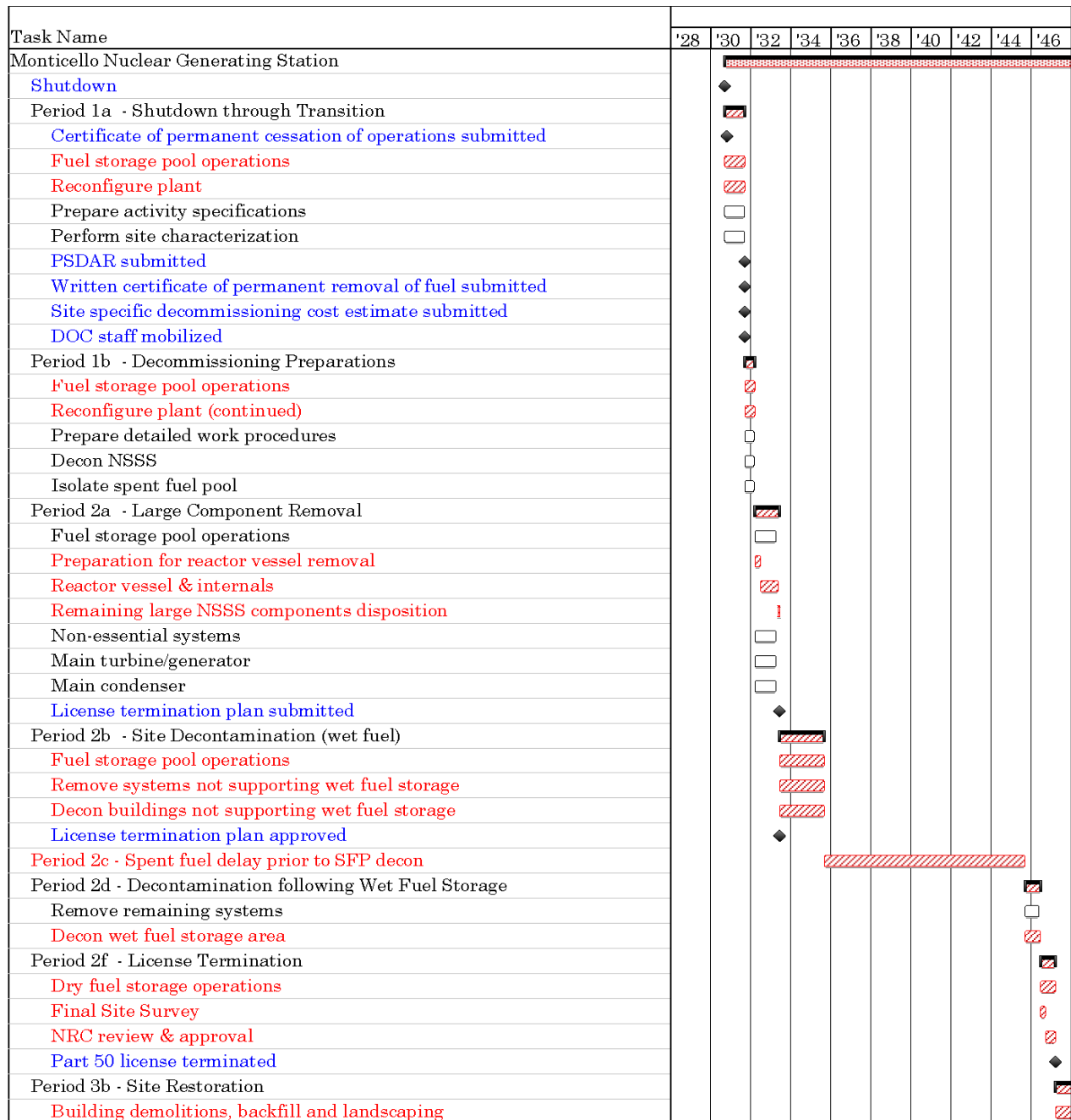


**FIGURE 4.1
ACTIVITY SCHEDULE
(continued)**

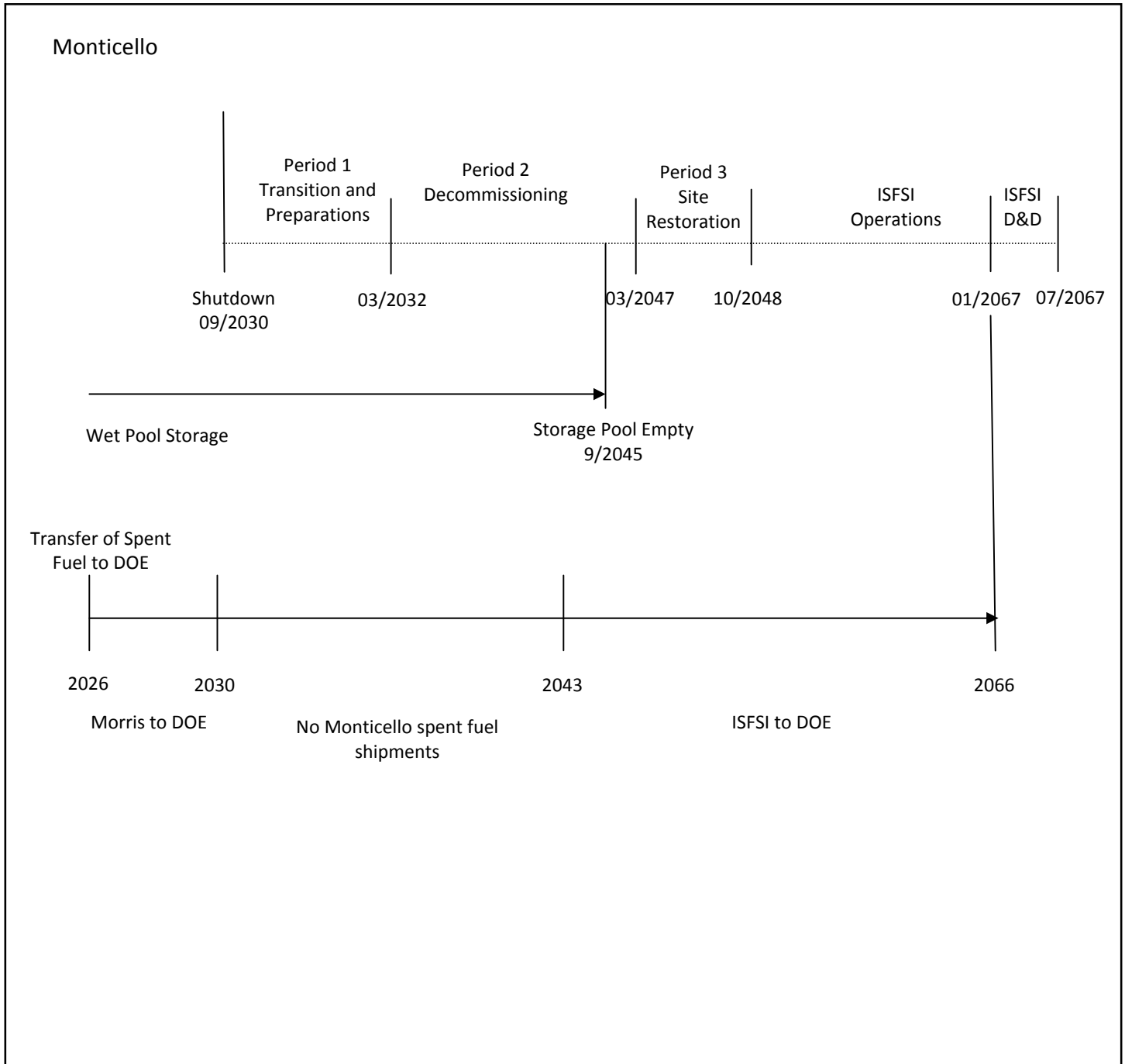
LEGEND

1. Red scheduling bars indicate critical path activities
2. Blue scheduling bars associated with major decommissioning periods, e.g., Period 1a, indicate overall duration of that period
3. Diamond symbols indicate major milestones
4. In the chart header, the “Y1”, “Y4”, et. al. refers to the years of the decommissioning project. Therefore, “Y1” is the year of shutdown, or 2030.

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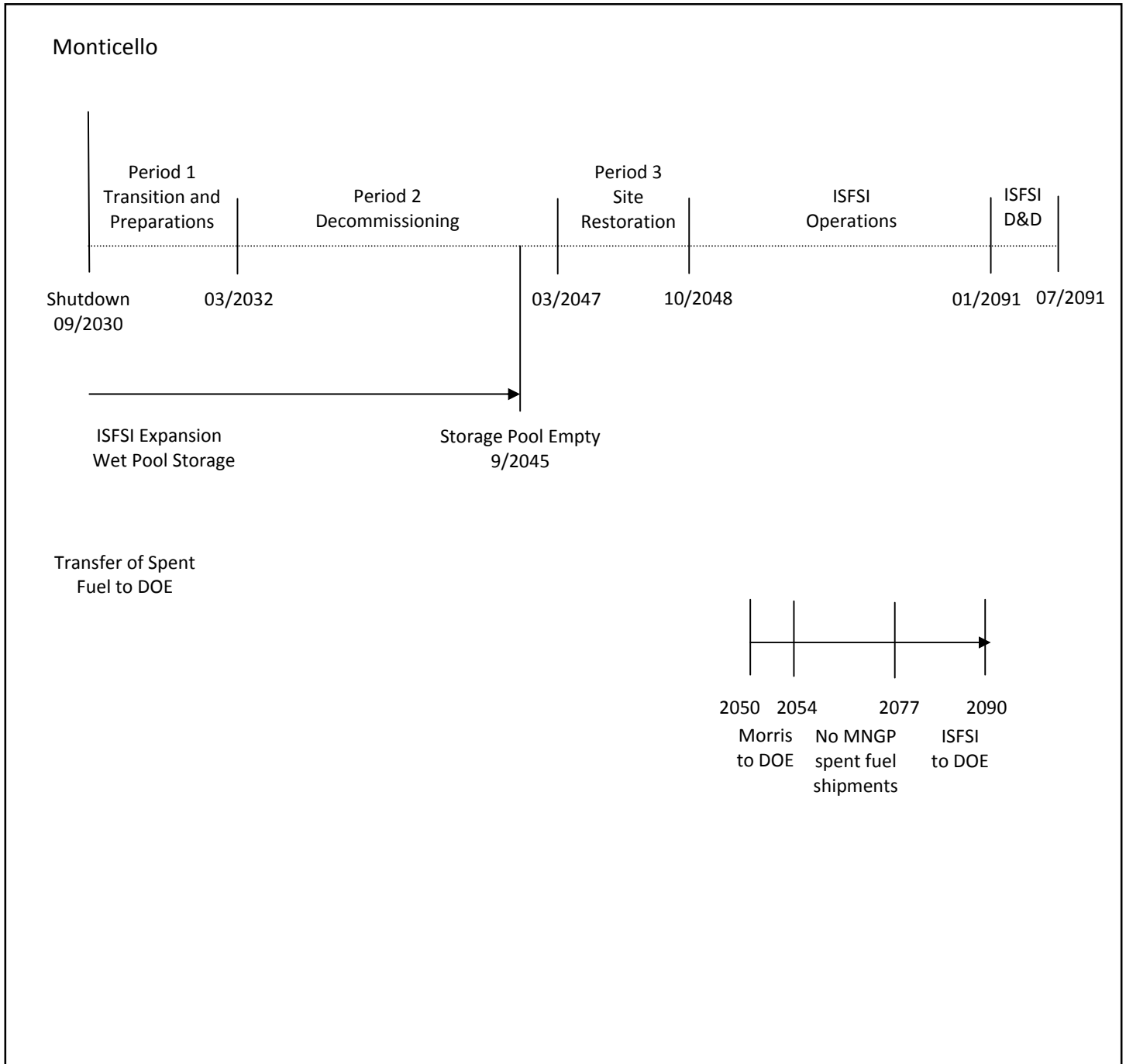
**FIGURE 4.2
SCENARIO 1 DECOMMISSIONING TIMELINE
(not to scale)**



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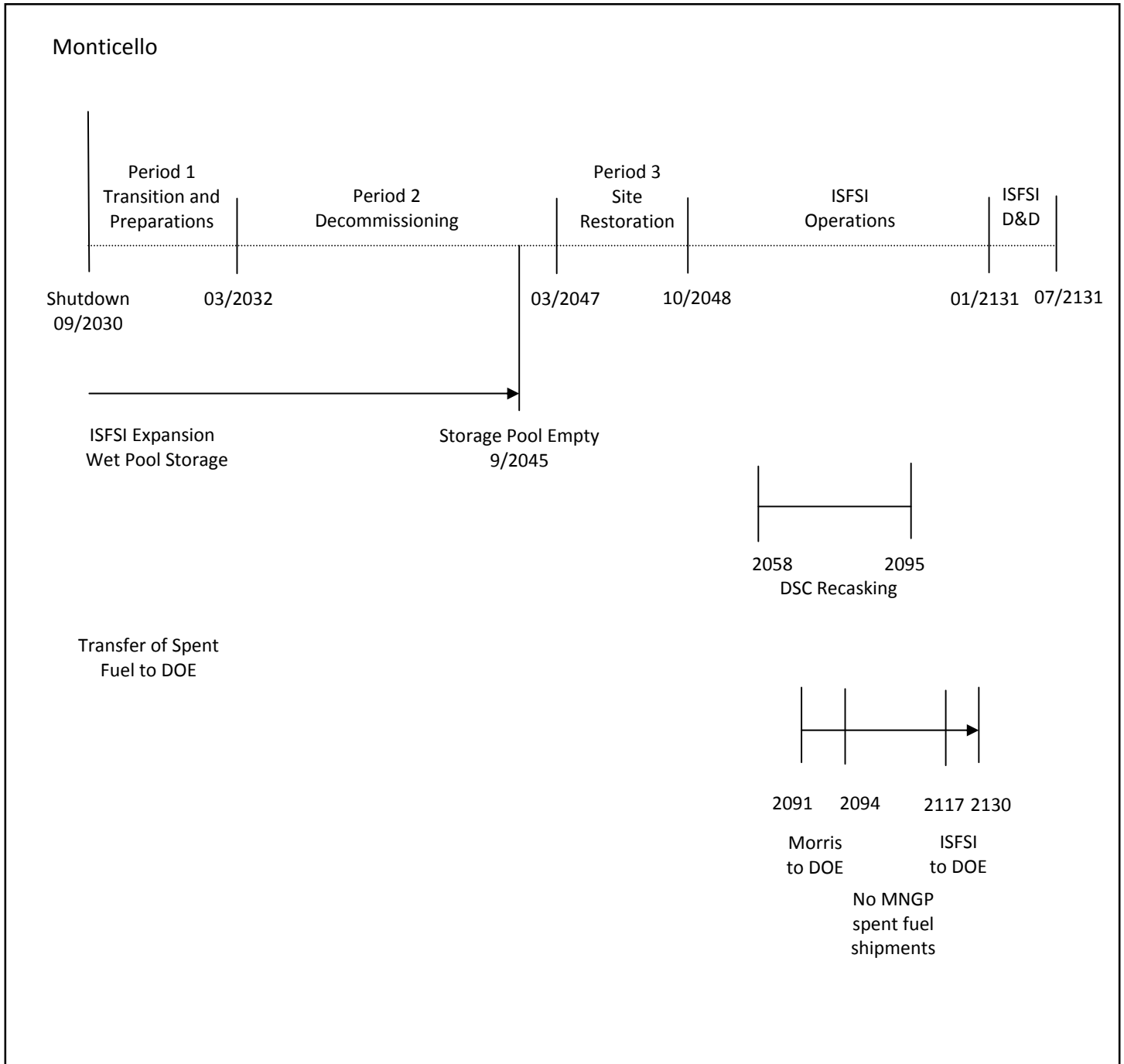
**FIGURE 4.3
SCENARIO 2 DECOMMISSIONING TIMELINE
(not to scale)**



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Decommissioning Cost Analysis**

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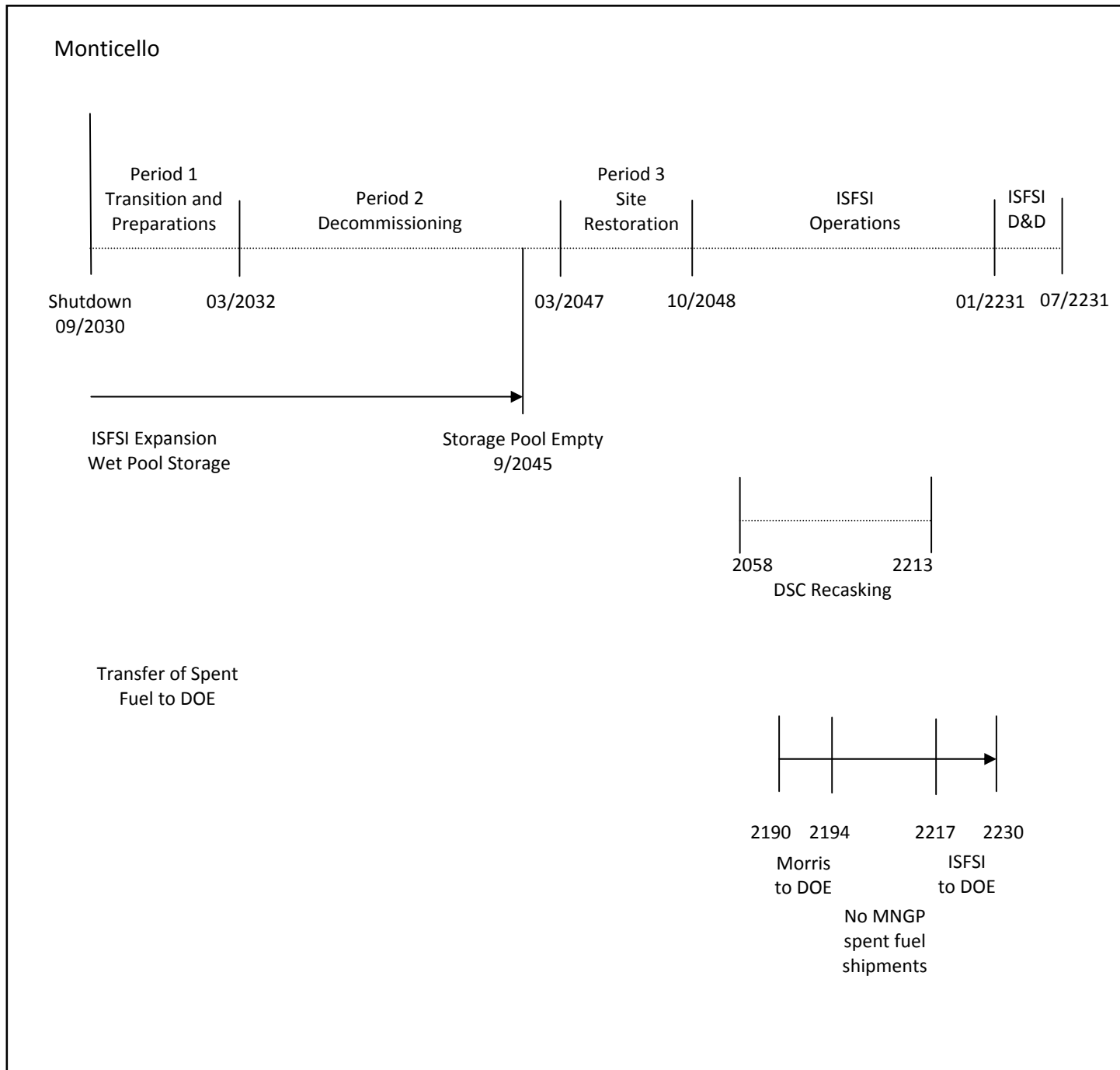
**FIGURE 4.4
SCENARIO 3 DECOMMISSIONING TIMELINE
(not to scale)**



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**FIGURE 4.5
SCENARIO 4 DECOMMISSIONING TIMELINE
(not to scale)**



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5. RADIOACTIVE WASTES

The objectives of the decommissioning process are the removal of all radioactive material from the site that would restrict its future use and the termination of the NRC license. This currently requires the remediation of all radioactive material at the site in excess of applicable legal limits. Under the Atomic Energy Act,^[38] the NRC is responsible for protecting the public from sources of ionizing radiation. Title 10 of the Code of Federal Regulations delineates the production, utilization, and disposal of radioactive materials and processes. In particular, Part 71 defines radioactive material as it pertains to transportation and Part 61 specifies its disposition.

Most of the materials being transported for controlled burial are categorized as Low Specific Activity (LSA) or Surface Contaminated Object (SCO) materials containing Type A quantities, as defined in 49 CFR Parts 173-178. Shipping containers are required to be Industrial Packages (IP-1, IP-2 or IP-3, as defined in 10 CFR §173.411). For this study, commercially available steel containers are presumed to be used for the disposal of piping, small components, and concrete. Larger components can serve as their own containers, with proper closure of all openings, access ways, and penetrations.

The destinations for the various waste streams from decommissioning are identified in Figures 5.1 and 5.2. The volumes of radioactive waste generated during the various decommissioning activities are shown on a line-item basis in Appendices C through F, and summarized in Tables 5.1, 5.2 and 5.3. The quantified waste volume summaries shown in these tables are consistent with Part 61 classifications. The volumes are calculated based on the exterior dimensions for containerized material and on the displaced volume of components serving as their own waste containers.

The reactor vessel and internals are categorized as large quantity shipments and, accordingly, will be shipped in reusable, shielded truck casks with disposable liners. In calculating disposal costs, the burial fees are applied against the liner volume, as well as the special handling requirements of the payload. Packaging efficiencies are lower for the highly activated materials (greater than Type A quantity waste), where high concentrations of gamma-emitting radionuclides limit the capacity of the shipping canisters.

No process system containing/handling radioactive substances at shutdown is presumed to meet material release criteria by decay alone (i.e., systems radioactive at shutdown will still be radioactive over the time period during which the decommissioning is accomplished, due to the presence of long-lived radionuclides).

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While the dose rates decrease with time, radionuclides such as ^{137}Cs will still control the disposition requirements.

The waste material produced in the decontamination and dismantling of the nuclear station is primarily generated during Period 2. Material that is considered potentially contaminated when removed from the radiological controlled area is sent to processing facilities in Tennessee for conditioning and disposal. Heavily contaminated components and activated materials are routed for controlled disposal. The disposal volumes reported in the tables reflect the savings resulting from reprocessing and recycling.

For purposes of constructing the estimates, the cost for disposal at the EnergySolutions facility was used. Separate rates were used for containerized waste and large components, including the steam generators and reactor coolant pump motors. Demolition debris including miscellaneous steel, scaffolding, and concrete was disposed of at a bulk rate. The decommissioning waste stream also included resins and dry active waste.

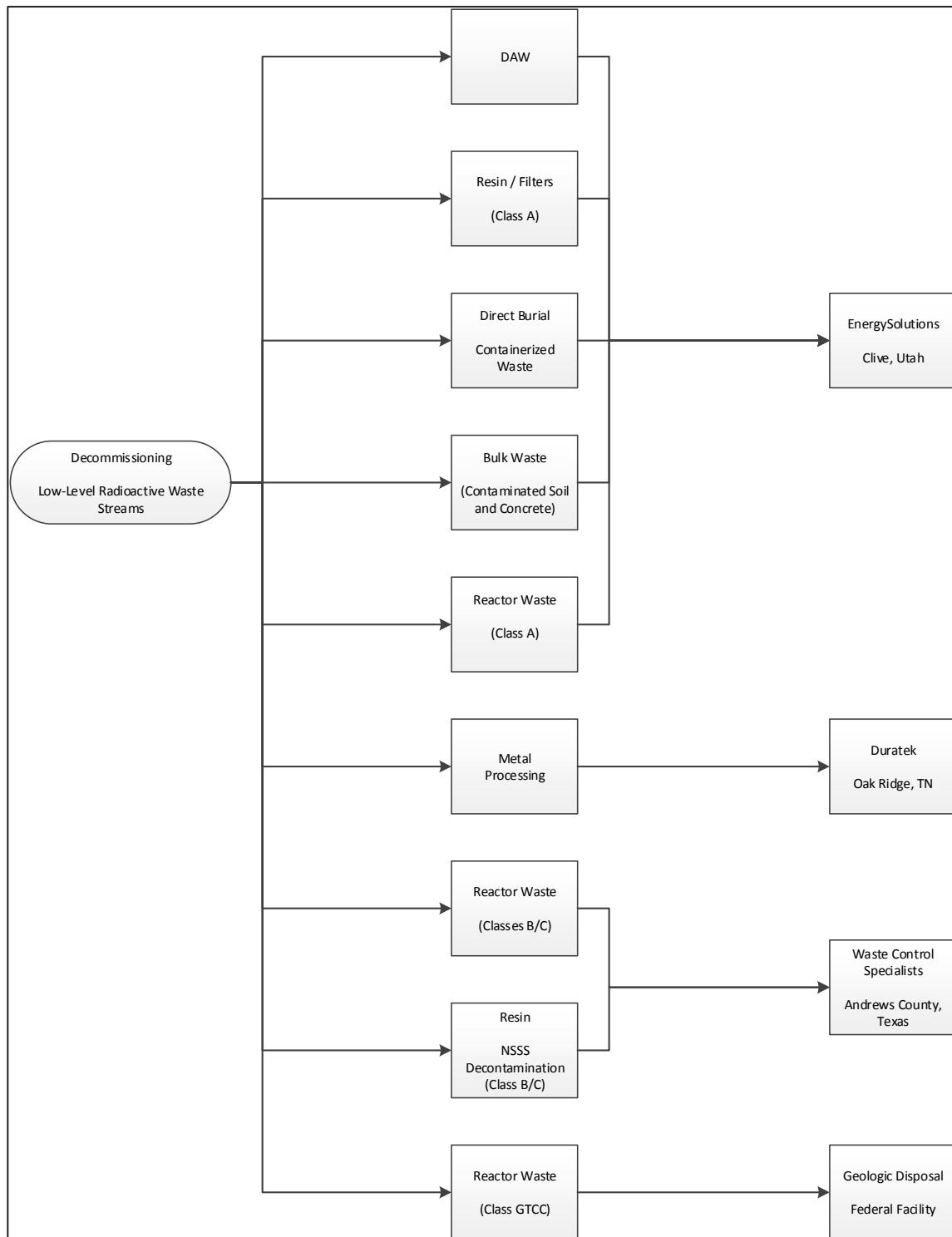
The recently completed facility in Andrews County was declared operational by the operator, Waste Control Specialists (WCS), in November 2011. The facility will be able to accept limited quantities of non-Compact waste; however, at this time the cost for non-Compact generators is being negotiated on an individual basis. The Texas facility is licensed to receive the higher activity waste forms (Classes B and C). As such, for this analysis, disposal costs for the Class B and C waste were based upon the preliminary and indicative information on the cost for such from WCS.

A small quantity of material will be generated during the Monticello decommissioning that is not considered suitable for near-surface disposal, and is assumed to be disposed of in a geologic repository, in a manner similar to that envisioned for spent fuel disposal. This material, known as Greater-Than-Class-C or GTCC material, is estimated to require seven spent fuel storage canisters (or the equivalent) to dispose of the most radioactive portions of the two reactor vessel internals. The volume and weight reported in Tables 5.1, 5.2 and 5.3 represent the packaged weight and volume of the spent fuel storage canisters.

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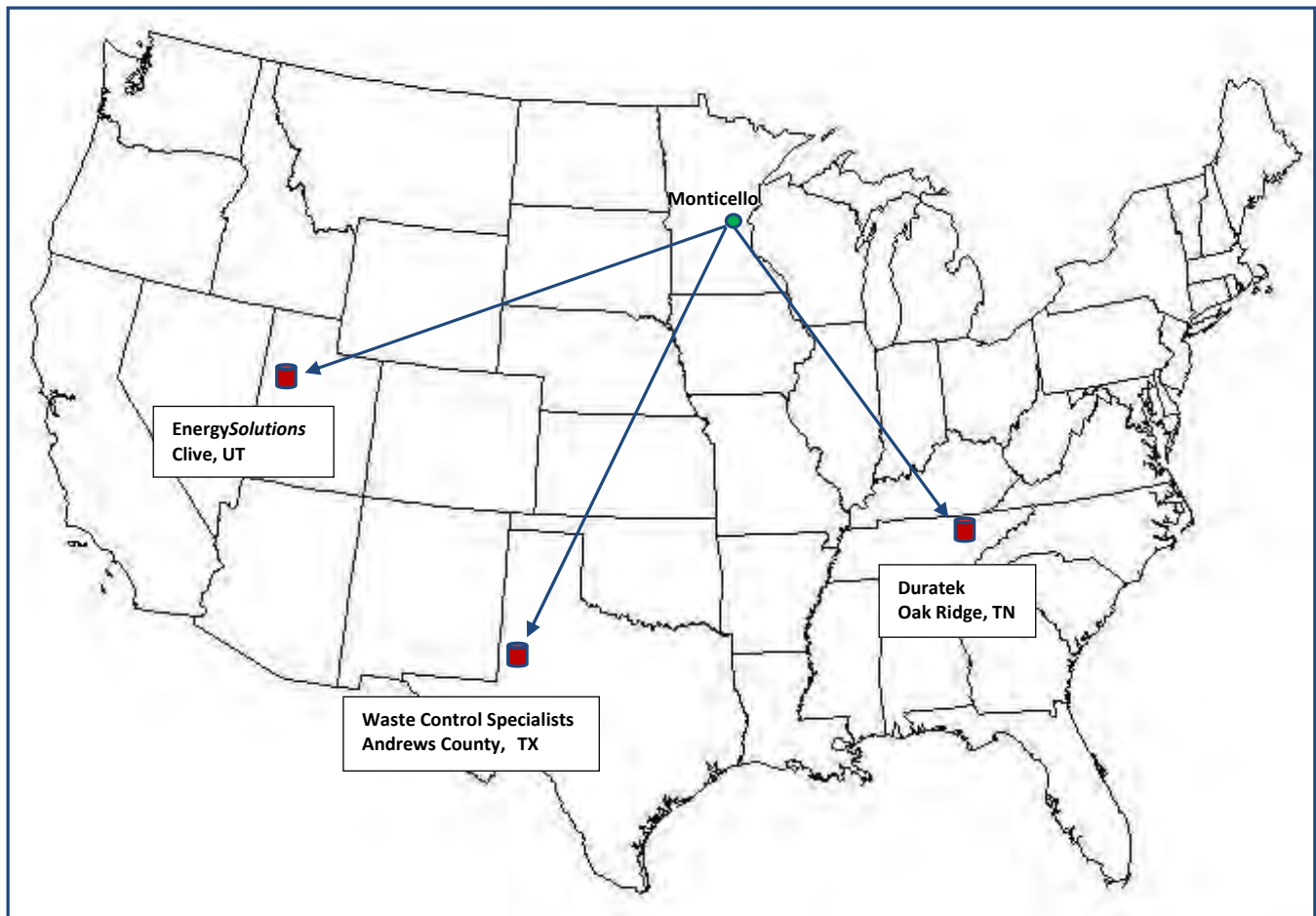
**FIGURE 5.1
RADIOACTIVE WASTE DISPOSITION**



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**FIGURE 5.2
DECOMMISSIONING WASTE DESTINATIONS
RADIOLOGICAL**



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**TABLE 5.1
SCENARIOS 1 AND 2
DECOMMISSIONING WASTE SUMMARY**

Waste	Cost Basis	Class ^[1]	Waste Volume (cubic feet)	Weight (pounds)
Low-Level Radioactive Waste (near-surface disposal)	EnergySolutions Containerized	A	107,967	7,447,925
	EnergySolutions Bulk	A	54,800	3,518,709
	WCS	B	1,711	185,173
	WCS	C	1,010	79,764
Greater than Class C (geologic repository)	Spent Fuel Equivalent	GTCC	1,785	346,570
Total ^[2]				
Processed/Conditioned (off-site recycling center)	Recycling Vendors	A	288,695	12,157,230
Scrap Metal				30,998,000

^[1] Waste is classified according to the requirements as delineated in Title 10 CFR, Part 61.55

^[2] Columns may not add due to rounding.

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**TABLE 5.2
SCENARIO 3
DECOMMISSIONING WASTE SUMMARY**

Waste	Cost Basis	Class ^[1]	Waste Volume (cubic feet)	Weight (pounds)
Low-Level Radioactive Waste (near-surface disposal)	EnergySolutions Containerized	A	134,591	10,110,370
	EnergySolutions Bulk	A	54,989	3,535,341
	WCS	B	1,711	185,173
	WCS	C	1,010	79,764
Greater than Class C (geologic repository)	Spent Fuel Equivalent	GTCC	1,785	346,570
Total ^[2]				
Processed/Conditioned (off-site recycling center)	Recycling Vendors	A	288,695	12,157,230
Scrap Metal				30,998,000

^[1] Waste is classified according to the requirements as delineated in Title 10 CFR, Part 61.55

^[2] Columns may not add due to rounding.

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**TABLE 5.3
SCENARIO 4
DECOMMISSIONING WASTE SUMMARY**

Waste	Cost Basis	Class ^[1]	Waste Volume (cubic feet)	Weight (pounds)
Low-Level Radioactive Waste (near-surface disposal)	EnergySolutions Containerized	A	195,900	16,241,250
	EnergySolutions Bulk	A	54,989	3,535,341
	WCS	B	1,711	185,173
	WCS	C	1,010	79,764
Greater than Class C (geologic repository)	Spent Fuel Equivalent	GTCC	1,785	346,570
Total ^[2]				
Processed/Conditioned (off-site recycling center)	Recycling Vendors	A	288,695	12,157,230
Scrap Metal				30,998,000

^[1] Waste is classified according to the requirements as delineated in Title 10 CFR, Part 61.55

^[2] Columns may not add due to rounding.

6. RESULTS

The analysis to estimate the costs to decommission Monticello relied upon the site-specific, technical information provided by Xcel Energy. While not an engineering study, the estimates provide the owner with sufficient information to assess their financial obligations as they pertain to the eventual decommissioning of the nuclear station.

The cost projected to promptly decommission the Monticello nuclear station is estimated to be \$1.114 billion (Scenario 1). The estimates are based on numerous fundamental assumptions, including regulatory requirements, low-level radioactive waste disposal practices, high-level waste management considerations, and project contingencies.

The primary cost contributors, identified in Tables 6.1 through 6.4, are either labor-related or associated with the management and disposition of the radioactive waste. Program management is the largest single contributor to the overall cost. The magnitude of the expense is a function of both the size of the organization required to manage the decommissioning, as well as the duration of the program. It is assumed, for purposes of this analysis, that Xcel Energy will oversee the decommissioning program, using a DOC to manage the decommissioning labor force and the associated subcontractors. The size and composition of the management organization varies with the decommissioning phase and associated site activities. However, once the operating license is amended or terminated, the staff is substantially reduced for the conventional demolition and restoration of the site, and the long-term care of the spent fuel.

As described in this report, the spent fuel pool will remain operational for fifteen years following the cessation of operations. The pool will be isolated to allow decommissioning operations to proceed in and around the pool area. Over the fifteen year period, the spent fuel will be packaged into transportable canisters for transfer to the ISFSI.

The cost for waste disposal includes only those costs associated with the controlled disposition of the low-level radioactive waste generated from decontamination and dismantling activities, including plant equipment and components, structural material, filters, resins and dry-active waste. As described in Section 5, disposition of the majority of the low-level radioactive material requiring controlled disposal is at the EnergySolutions facility in Clive, Utah. Highly activated components, requiring additional isolation from the environment, are packaged for geologic disposal. The cost of geologic disposal is based upon a cost equivalent for spent fuel.

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A significant portion of the metallic waste is designated for additional processing and treatment at an off-site facility. Processing reduces the volume of material requiring controlled disposal through such techniques and processes as survey and sorting, decontamination, and volume reduction. The material that cannot be unconditionally released is packaged for controlled disposal at one of the currently operating facilities. The cost identified in the summary tables for processing is all-inclusive, incorporating the ultimate disposition of the material.

Removal costs reflect the labor-intensive nature of the decommissioning process, as well as the management controls required to ensure a safe and successful program. Decontamination and packaging costs also have a large labor component that is based upon prevailing wages. Non-radiological demolition is a natural extension of the decommissioning process. The methods employed in decontamination and dismantling are generally destructive and indiscriminate in inflicting collateral damage. With a work force mobilized to support decommissioning operations, non-radiological demolition can be an integrated activity and a logical expansion of the work being performed in the process of terminating the operating license. Prompt demolition reduces future liabilities and can be more cost effective than deferral, due to the deterioration of the facilities (and therefore the working conditions) with time.

The reported cost for transport includes the tariffs and surcharges associated with moving large components and/or overweight shielded casks overland, as well as the general expense (i.e., labor and fuel) of transporting material to the destinations identified in this report. For purposes of this analysis, material is primarily moved overland by truck.

Decontamination is used to reduce the plant's radiation fields and minimize worker exposure. Slightly contaminated material or material located within a contaminated area is sent to an off-site processing center (i.e., this analysis does not assume that contaminated plant components and equipment can be decontaminated for uncontrolled release in-situ). Centralized processing centers have proven to be a more economical means of handling the large volumes of material produced in the dismantling of a nuclear plant.

License termination survey costs are associated with the labor intensive and complex activity of verifying that contamination has been removed from the site to the levels specified by the regulating agency. This process involves a systematic survey of all remaining plant surface areas and surrounding environs, sampling, isotopic analysis, and documentation of the findings. The status of any plant components and materials not removed in the decommissioning process will also require confirmation and will add to the expense of surveying the facilities alone.

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The remaining costs include allocations for heavy equipment and temporary services, as well as for other expenses such as regulatory fees and the premiums for nuclear insurance. While site operating costs are greatly reduced following the final cessation of plant operations, certain administrative functions do need to be maintained either at a basic functional or regulatory level.

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**TABLE 6.1
SCENARIO 1
COST SUMMARY
DECOMMISSIONING COST ELEMENTS**
(thousands of 2014 dollars)

Cost Element	Total	Percentage
Decontamination	19,887	1.8
Removal	95,673	8.6
Packaging	29,423	2.6
Transportation	11,606	1.0
Waste Disposal	85,832	7.7
Off-site Waste Processing	28,802	2.6
Program Management ^[1]	334,224	30.0
Railroad Track Maintenance	4,580	0.4
Spent Fuel Management (direct costs) ^[2]	225,000	20.2
Insurance and Regulatory Fees	32,367	2.9
Energy	30,702	2.8
Characterization and Licensing Surveys	22,669	2.0
Property Taxes	47,042	4.2
Miscellaneous Equipment	7,414	0.7
Spent Fuel Pool Isolation	12,434	1.1
Security	125,973	11.3
Total ^[3]	1,113,628	100.0

Cost Element	Total	Percentage
License Termination	697,451	62.6
Spent Fuel Management	375,071	33.7
Site Restoration	41,106	3.7
Total ^[3]	1,113,628	100.0

^[1] Includes engineering and security costs

^[2] Excludes program management costs (staffing) but includes capital expenditures for ISFSI construction, costs for spent fuel loading/transfer costs/spent fuel pool O&M and EP fees

^[3] Columns may not add due to rounding

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**TABLE 6.2
SCENARIO 2
COST SUMMARY
DECOMMISSIONING COST ELEMENTS**
(thousands of 2014 dollars)

Cost Element	Total	Percentage
Decontamination	19,887	1.5
Removal	95,673	7.3
Packaging	29,423	2.3
Transportation	11,606	0.9
Waste Disposal	85,832	6.6
Off-site Waste Processing	28,802	2.2
Program Management ^[1]	368,279	28.2
Railroad Track Maintenance	4,283	0.3
Spent Fuel Management (direct costs) ^[2]	296,659	22.7
Insurance and Regulatory Fees	46,934	3.6
Energy	30,702	2.4
Characterization and Licensing Surveys	22,669	1.7
Property Taxes	62,507	4.8
Miscellaneous Equipment	7,414	0.6
Spent Fuel Pool Isolation	12,434	1.0
Security	184,812	14.1
Total ^[3]	1,307,915	100.0

Cost Element	Total	Percentage
License Termination	697,450	53.3
Spent Fuel Management	569,359	43.5
Site Restoration	41,106	3.1
Total ^[3]	1,307,915	100.0

^[1] Includes engineering and security costs

^[2] Excludes program management costs (staffing) but includes capital expenditures for ISFSI construction, costs for spent fuel loading/transfer costs/spent fuel pool O&M and EP fees

^[3] Columns may not add due to rounding

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**TABLE 6.3
SCENARIO 3
COST SUMMARY
DECOMMISSIONING COST ELEMENTS**
(thousands of 2014 dollars)

Cost Element	Total	Percentage
Decontamination	19,922	0.9
Removal	96,055	4.5
Packaging	29,428	1.4
Transportation	12,286	0.6
Waste Disposal	96,158	4.5
Off-site Waste Processing	28,802	1.4
Program Management ^[1]	496,803	23.4
Railroad Track Maintenance	4,283	0.2
Spent Fuel Management (direct costs) ^[2]	756,819	35.6
Insurance and Regulatory Fees	71,203	3.4
Energy	30,702	1.5
Characterization and Licensing Surveys	22,669	1.1
Property Taxes	156,616	7.4
Miscellaneous Equipment	7,414	0.4
Spent Fuel Pool Isolation	12,434	0.6
Security	282,841	13.3
Total ^[3]	2,124,434	100.0

Cost Element	Total	Percentage
License Termination	697,778	32.9
Spent Fuel Management	1,385,171	65.2
Site Restoration	41,485	2.0
Total ^[3]	2,124,434	100.0

^[1] Includes engineering and security costs

^[2] Excludes program management costs (staffing) but includes capital expenditures for ISFSI construction, costs for spent fuel loading/transfer costs/spent fuel pool O&M and EP fees

^[3] Columns may not add due to rounding

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**TABLE 6.4
SCENARIO 4
COST SUMMARY
DECOMMISSIONING COST ELEMENTS**
(thousands of 2014 dollars)

Cost Element	Total	Percentage
Decontamination	19,922	0.5
Removal	96,055	2.3
Packaging	29,428	0.7
Transportation	13,840	0.3
Waste Disposal	119,801	2.9
Off-site Waste Processing	28,802	0.7
Program Management ^[1]	1,096,781	26.5
Railroad Track Maintenance	4,283	0.1
Spent Fuel Management (direct costs) ^[2]	1,846,162	44.5
Insurance and Regulatory Fees	131,882	3.2
Energy	30,702	0.7
Characterization and Licensing Surveys	22,669	0.6
Property Taxes	156,617	3.8
Miscellaneous Equipment	7,414	0.2
Spent Fuel Pool Isolation	12,434	0.3
Security	527,940	12.7
Total ^[3]	4,144,730	100.0

Cost Element	Total	Percentage
License Termination	697,778	16.8
Spent Fuel Management	3,405,467	82.2
Site Restoration	41,485	1.0
Total ^[3]	4,144,730	100.0

^[1] Includes engineering and security costs

^[2] Excludes program management costs (staffing) but includes capital expenditures for ISFSI construction, costs for spent fuel loading/transfer costs/spent fuel pool O&M and EP fees

^[3] Columns may not add due to rounding

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APPENDIX A

UNIT COST FACTOR DEVELOPMENT

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**APPENDIX A
UNIT COST FACTOR DEVELOPMENT**

Example: Unit Factor for Removal of Contaminated Heat Exchanger < 3,000 lbs.

1. SCOPE

Heat exchangers weighing < 3,000 lbs. will be removed in one piece using a crane or small hoist. They will be disconnected from the inlet and outlet piping. The heat exchanger will be sent to the waste processing area.

2. CALCULATIONS

Act ID	Activity Description	Activity Duration (minutes)	Critical Duration (minutes)
a	Remove insulation	60	(b)
b	Mount pipe cutters	60	60
c	Install contamination controls	20	(b)
d	Disconnect inlet and outlet lines	60	60
e	Cap openings	20	(d)
f	Rig for removal	30	30
g	Unbolt from mounts	30	30
h	Remove contamination controls	15	15
i	Remove, wrap in plastic, send to waste processing area	60	60
Totals (Activity/Critical)		355	255

Duration adjustment(s):

+ Respiratory protection adjustment (50% of critical duration) 128

+ Radiation/ALARA adjustment (37.08% of critical duration) 95

Adjusted work duration 478

+ Protective clothing adjustment (30% of adjusted duration) 143

Productive work duration 621

+ Work break adjustment (8.33 % of productive duration) 52

Total work duration (minutes) 673

Total duration = 11.217 hours

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3. LABOR REQUIRED

Crew	Number	Duration (hr)	Rate (\$/hr)	Cost
Laborers	3.00	11.217	\$50.24	\$1,690.63
Craftsmen	2.00	11.217	\$62.77	\$1,408.18
Foreman	1.00	11.217	\$68.02	\$762.98
General Foreman	0.25	11.217	\$70.14	\$196.69
Fire Watch	0.05	11.217	\$50.24	\$28.18
Health Physics Technician	1.00	11.217	\$48.84	\$547.84
Total labor cost				\$4,634.50

4. EQUIPMENT & CONSUMABLES COSTS

Equipment Costs	none
Consumables/Materials Costs	
Gas torch consumables 1 @ \$18.60/hour x 1 hour ^[1]	\$18.60
Tarpaulin, oil resistant, fire retardant 50 @ \$0.26 square foot ^[2]	\$13.00
Polypropylene sorbent rolls 50 @ \$0.59/square foot ^[3]	\$29.50
Subtotal cost of equipment and materials	\$61.10
Overhead & sales tax on equipment and materials @ 16.88 %	\$10.31
Total costs, equipment & material	\$71.41

TOTAL COST: Removal of contaminated heat exchanger <3000 pounds: \$4,705.91

Total labor cost: \$4,634.50
Total equipment/material costs: \$71.41
Total craft labor man-hours required per unit: 81.88

APPENDIX A (continued)

5. NOTES AND REFERENCES

Work difficulty factors were developed in conjunction with the Atomic Industrial Forum (AIF) (now Nuclear Energy Institute) program to standardize nuclear decommissioning cost estimates and are delineated in Volume 1, Chapter 5 of the "Guidelines for Producing Commercial Nuclear Power Plant Decommissioning Cost Estimates," AIF/NESP-036, May 1986.

References for equipment & consumables costs:

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Material and consumable costs were adjusted using the regional indices for Minneapolis, Minnesota.

APPENDIX B
UNIT COST FACTOR LISTING

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APPENDIX B

**UNIT COST FACTOR LISTING
(Power Block Structures Only)**

Unit Cost Factor	Cost/Unit(\$)
Removal of clean instrument and sampling tubing, \$/linear foot	0.55
Removal of clean pipe 0.25 to 2 inches diameter, \$/linear foot	5.88
Removal of clean pipe >2 to 4 inches diameter, \$/linear foot	8.37
Removal of clean pipe >4 to 8 inches diameter, \$/linear foot	16.14
Removal of clean pipe >8 to 14 inches diameter, \$/linear foot	31.23
Removal of clean pipe >14 to 20 inches diameter, \$/linear foot	40.65
Removal of clean pipe >20 to 36 inches diameter, \$/linear foot	59.80
Removal of clean pipe >36 inches diameter, \$/linear foot	71.03
Removal of clean valve >2 to 4 inches	107.99
Removal of clean valve >4 to 8 inches	161.41
Removal of clean valve >8 to 14 inches	312.32
Removal of clean valve >14 to 20 inches	406.54
Removal of clean valve >20 to 36 inches	598.01
Removal of clean valve >36 inches	710.35
Removal of clean pipe hanger for small bore piping	37.53
Removal of clean pipe hanger for large bore piping	133.14
Removal of clean pump, <300 pound	273.29
Removal of clean pump, 300-1000 pound	751.65
Removal of clean pump, 1000-10,000 pound	2,973.12
Removal of clean pump, >10,000 pound	5,753.64
Removal of clean pump motor, 300-1000 pound	313.69
Removal of clean pump motor, 1000-10,000 pound	1,234.55
Removal of clean pump motor, >10,000 pound	2,777.73
Removal of clean heat exchanger <3000 pound	1,600.36
Removal of clean heat exchanger >3000 pound	4,033.71
Removal of clean feedwater heater/deaerator	11,343.60
Removal of clean moisture separator/reheater	23,284.41
Removal of clean tank, <300 gallons	351.41
Removal of clean tank, 300-3000 gallon	1,106.14
Removal of clean tank, >3000 gallons, \$/square foot surface area	9.24

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Unit Cost Factor	Cost/Unit(\$)
Removal of clean electrical equipment, <300 pound	147.73
Removal of clean electrical equipment, 300-1000 pound	510.72
Removal of clean electrical equipment, 1000-10,000 pound	1,021.43
Removal of clean electrical equipment, >10,000 pound	2,430.28
Removal of clean electrical transformer < 30 tons	1,687.80
Removal of clean electrical transformer > 30 tons	4,860.57
Removal of clean standby diesel generator, <100 kW	1,723.94
Removal of clean standby diesel generator, 100 kW to 1 MW	3,847.96
Removal of clean standby diesel generator, >1 MW	7,966.04
Removal of clean electrical cable tray, \$/linear foot	13.92
Removal of clean electrical conduit, \$/linear foot	6.08
Removal of clean mechanical equipment, <300 pound	147.73
Removal of clean mechanical equipment, 300-1000 pound	510.72
Removal of clean mechanical equipment, 1000-10,000 pound	1,021.43
Removal of clean mechanical equipment, >10,000 pound	2,430.28
Removal of clean HVAC equipment, <300 pound	178.63
Removal of clean HVAC equipment, 300-1000 pound	613.67
Removal of clean HVAC equipment, 1000-10,000 pound	1,223.03
Removal of clean HVAC equipment, >10,000 pound	2,430.28
Removal of clean HVAC ductwork, \$/pound	0.58
Removal of contaminated instrument and sampling tubing, \$/linear foot	1.65
Removal of contaminated pipe 0.25 to 2 inches diameter, \$/linear foot	22.89
Removal of contaminated pipe >2 to 4 inches diameter, \$/linear foot	39.68
Removal of contaminated pipe >4 to 8 inches diameter, \$/linear foot	62.06
Removal of contaminated pipe >8 to 14 inches diameter, \$/linear foot	122.92
Removal of contaminated pipe >14 to 20 inches diameter, \$/linear foot	147.89
Removal of contaminated pipe >20 to 36 inches diameter, \$/linear foot	204.98
Removal of contaminated pipe >36 inches diameter, \$/linear foot	242.39
Removal of contaminated valve >2 to 4 inches	476.96
Removal of contaminated valve >4 to 8 inches	571.17

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**UNIT COST FACTOR LISTING
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Unit Cost Factor	Cost/Unit(\$)
Removal of contaminated valve >8 to 14 inches	1,179.51
Removal of contaminated valve >14 to 20 inches	1,500.93
Removal of contaminated valve >20 to 36 inches	2,000.14
Removal of contaminated valve >36 inches	2,374.21
Removal of contaminated pipe hanger for small bore piping	154.89
Removal of contaminated pipe hanger for large bore piping	509.98
Removal of contaminated pump, <300 pound	1,019.54
Removal of contaminated pump, 300-1000 pound	2,360.34
Removal of contaminated pump, 1000-10,000 pound	7,785.90
Removal of contaminated pump, >10,000 pound	18,968.04
Removal of contaminated pump motor, 300-1000 pound	999.21
Removal of contaminated pump motor, 1000-10,000 pound	3,162.79
Removal of contaminated pump motor, >10,000 pound	7,100.84
Removal of contaminated heat exchanger <3000 pound	4,705.91
Removal of contaminated heat exchanger >3000 pound	13,634.02
Removal of contaminated tank, <300 gallons	1,693.11
Removal of contaminated tank, >300 gallons, \$/square foot	33.18
Removal of contaminated electrical equipment, <300 pound	789.28
Removal of contaminated electrical equipment, 300-1000 pound	1,914.94
Removal of contaminated electrical equipment, 1000-10,000 pound	3,687.25
Removal of contaminated electrical equipment, >10,000 pound	7,240.23
Removal of contaminated electrical cable tray, \$/linear foot	38.24
Removal of contaminated electrical conduit, \$/linear foot	17.99
Removal of contaminated mechanical equipment, <300 pound	878.49
Removal of contaminated mechanical equipment, 300-1000 pound	2,116.31
Removal of contaminated mechanical equipment, 1000-10,000 pound	4,068.41
Removal of contaminated mechanical equipment, >10,000 pound	7,240.23
Removal of contaminated HVAC equipment, <300 pound	878.49
Removal of contaminated HVAC equipment, 300-1000 pound	2,116.31
Removal of contaminated HVAC equipment, 1000-10,000 pound	4,068.41

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**UNIT COST FACTOR LISTING
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Unit Cost Factor	Cost/Unit(\$)
Removal of contaminated HVAC equipment, >10,000 pound	7,240.23
Removal of contaminated HVAC ductwork, \$/pound	2.31
Removal/plasma arc cut of contaminated thin metal components, \$/linear in.	4.24
Additional decontamination of surface by washing, \$/square foot	8.89
Additional decontamination of surfaces by hydrolasing, \$/square foot	37.56
Decontamination rig hook up and flush, \$/ 250 foot length	7,437.80
Chemical flush of components/systems, \$/gallon	18.97
Removal of clean standard reinforced concrete, \$/cubic yard	155.03
Removal of grade slab concrete, \$/cubic yard	206.68
Removal of clean concrete floors, \$/cubic yard	407.04
Removal of sections of clean concrete floors, \$/cubic yard	1,206.39
Removal of clean heavily rein concrete w/#9 rebar, \$/cubic yard	262.89
Removal of contaminated heavily rein concrete w/#9 rebar, \$/cubic yard	2,348.88
Removal of clean heavily rein concrete w/#18 rebar, \$/cubic yard	332.38
Removal of contaminated heavily rein concrete w/#18 rebar, \$/cubic yard	3,108.79
Removal heavily rein concrete w/#18 rebar & steel embedments, \$/cubic yard	501.85
Removal of below-grade suspended floors, \$/cubic yard	407.04
Removal of clean monolithic concrete structures, \$/cubic yard	1,009.67
Removal of contaminated monolithic concrete structures, \$/cubic yard	2,343.50
Removal of clean foundation concrete, \$/cubic yard	794.25
Removal of contaminated foundation concrete, \$/cubic yard	2,183.64
Explosive demolition of bulk concrete, \$/cubic yard	34.42
Removal of clean hollow masonry block wall, \$/cubic yard	112.26
Removal of contaminated hollow masonry block wall, \$/cubic yard	358.37
Removal of clean solid masonry block wall, \$/cubic yard	112.26
Removal of contaminated solid masonry block wall, \$/cubic yard	358.37
Backfill of below-grade voids, \$/cubic yard	33.46
Removal of subterranean tunnels/voids, \$/linear foot	128.32
Placement of concrete for below-grade voids, \$/cubic yard	128.07
Excavation of clean material, \$/cubic yard	3.40

**Monticello Nuclear Generating Plant
Decommissioning Cost Analysis**

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APPENDIX B

**UNIT COST FACTOR LISTING
(Power Block Structures Only)**

Unit Cost Factor	Cost/Unit(\$)
Excavation of contaminated material, \$/cubic yard	44.72
Removal of clean concrete rubble (tipping fee included), \$/cubic yard	26.11
Removal of contaminated concrete rubble, \$/cubic yard	29.13
Removal of building by volume, \$/cubic foot	0.34
Removal of clean building metal siding, \$/square foot	1.49
Removal of contaminated building metal siding, \$/square foot	4.81
Removal of standard asphalt roofing, \$/square foot	2.58
Removal of transite panels, \$/square foot	2.36
Scarifying contaminated concrete surfaces (drill & spall), \$/square foot	13.58
Scabbling contaminated concrete floors, \$/square foot	8.53
Scabbling contaminated concrete walls, \$/square foot	22.67
Scabbling contaminated ceilings, \$/square foot	77.93
Scabbling structural steel, \$/square foot	6.77
Removal of clean overhead crane/monorail < 10 ton capacity	710.31
Removal of contaminated overhead crane/monorail < 10 ton capacity	1,951.99
Removal of clean overhead crane/monorail >10-50 ton capacity	1,704.75
Removal of contaminated overhead crane/monorail >10-50 ton capacity	4,683.99
Removal of polar crane > 50 ton capacity	7,134.45
Removal of gantry crane > 50 ton capacity	30,378.56
Removal of structural steel, \$/pound	0.22
Removal of clean steel floor grating, \$/square foot	5.14
Removal of contaminated steel floor grating, \$/square foot	14.56
Removal of clean free standing steel liner, \$/square foot	13.85
Removal of contaminated free standing steel liner, \$/square foot	38.81
Removal of clean concrete-anchored steel liner, \$/square foot	6.92
Removal of contaminated concrete-anchored steel liner, \$/square foot	45.25
Placement of scaffolding in clean areas, \$/square foot	15.95
Placement of scaffolding in contaminated areas, \$/square foot	26.91
Landscaping with topsoil, \$/acre	24,693.56
Cost of CPC B-88 LSA box & preparation for use	2,048.71

***Monticello Nuclear Generating Plant
Decommissioning Cost Analysis***

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APPENDIX B

**UNIT COST FACTOR LISTING
(Power Block Structures Only)**

Unit Cost Factor	Cost/Unit(\$)
Cost of CPC B-25 LSA box & preparation for use	1,874.78
Cost of CPC B-12V 12 gauge LSA box & preparation for use	1,530.04
Cost of CPC B-144 LSA box & preparation for use	10,411.07
Cost of LSA drum & preparation for use	208.82
Cost of cask liner for CNSI 8 120A cask (resins)	12,290.34
Cost of cask liner for CNSI 8 120A cask (filters)	8,872.45
Decontamination of surfaces with vacuuming, \$/square foot	0.90

APPENDIX C

DETAILED COST ANALYSIS

SCENARIO 1

DECON DECOMMISSIONING COST ESTIMATE

WITH DOE PICKUP OF INDUSTRY SPENT FUEL STARTING IN 2025

Monticello Nuclear Generating Plant
Decommissioning Cost Analysis

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Table C
Monticello Nuclear Generating Plant
DECON 2025 DOE Fuel Pickup Decommissioning Cost Estimate
(Thousands of 2014 Dollars)

Activity Index	Activity Description	Decon Cost	Removal Cost	Packaging Costs	Transport Costs	Off-Site Processing Costs	LLRW Disposal Costs	Other Costs	Total Contingency	Total Costs	NRC Lic. Term. Costs	Spent Fuel Management Costs	Site Restoration Costs	Processed Volume Cu. Feet	Burial Volumes				Burial / Processed Wt., Lbs.	Craft Manhours	Utility and Contractor Manhours
															Class A Cu. Feet	Class B Cu. Feet	Class C Cu. Feet	GTCC Cu. Feet			
PERIOD 1a - Shutdown through Transition																					
Period 1a Direct Decommissioning Activities																					
1a.1.1	Prepare preliminary decommissioning cost	-	-	-	-	-	-	148	22	170	170	-	-	-	-	-	-	-	-	-	1,300
1a.1.2	Notification of Cessation of Operations									a											
1a.1.3	Remove fuel & source material									n/a											
1a.1.4	Notification of Permanent Defueling									a											
1a.1.5	Deactivate plant systems & process waste									a											
1a.1.6	Prepare and submit PSDAR	-	-	-	-	-	-	227	34	261	261	-	-	-	-	-	-	-	-	-	2,000
1a.1.7	Review plant dwgs & specs.	-	-	-	-	-	-	522	78	601	601	-	-	-	-	-	-	-	-	-	4,600
1a.1.8	Perform detailed rad survey									a											
1a.1.9	Estimate by-product inventory	-	-	-	-	-	-	114	17	131	131	-	-	-	-	-	-	-	-	-	1,000
1a.1.10	End product description	-	-	-	-	-	-	114	17	131	131	-	-	-	-	-	-	-	-	-	1,000
1a.1.11	Detailed by-product inventory	-	-	-	-	-	-	148	22	170	170	-	-	-	-	-	-	-	-	-	1,300
1a.1.12	Define major work sequence	-	-	-	-	-	-	851	128	979	979	-	-	-	-	-	-	-	-	-	7,500
1a.1.13	Perform SER and EA	-	-	-	-	-	-	352	53	405	405	-	-	-	-	-	-	-	-	-	3,100
1a.1.14	Perform Site-Specific Cost Study	-	-	-	-	-	-	568	85	653	653	-	-	-	-	-	-	-	-	-	5,000
1a.1.15	Prepare/submit License Termination Plan	-	-	-	-	-	-	465	70	535	535	-	-	-	-	-	-	-	-	-	4,096
1a.1.16	Receive NRC approval of termination plan									a											
Activity Specifications																					
1a.1.17.1	Plant & temporary facilities	-	-	-	-	-	-	559	84	642	578	-	64	-	-	-	-	-	-	-	4,920
1a.1.17.2	Plant systems	-	-	-	-	-	-	473	71	544	490	-	54	-	-	-	-	-	-	-	4,167
1a.1.17.3	NSSS Decontamination Flush	-	-	-	-	-	-	57	9	65	65	-	-	-	-	-	-	-	-	-	500
1a.1.17.4	Reactor internals	-	-	-	-	-	-	806	121	927	927	-	-	-	-	-	-	-	-	-	7,100
1a.1.17.5	Reactor vessel	-	-	-	-	-	-	738	111	849	849	-	-	-	-	-	-	-	-	-	6,500
1a.1.17.6	Sacrificial shield	-	-	-	-	-	-	57	9	65	65	-	-	-	-	-	-	-	-	-	500
1a.1.17.7	Moisture separators/reheaters	-	-	-	-	-	-	114	17	131	131	-	-	-	-	-	-	-	-	-	1,000
1a.1.17.8	Reinforced concrete	-	-	-	-	-	-	182	27	209	104	-	104	-	-	-	-	-	-	-	1,600
1a.1.17.9	Main Turbine	-	-	-	-	-	-	237	36	273	273	-	-	-	-	-	-	-	-	-	2,088
1a.1.17.10	Main Condensers	-	-	-	-	-	-	237	36	273	273	-	-	-	-	-	-	-	-	-	2,088
1a.1.17.11	Pressure suppression structure	-	-	-	-	-	-	227	34	261	261	-	-	-	-	-	-	-	-	-	2,000
1a.1.17.12	Drywell	-	-	-	-	-	-	182	27	209	209	-	-	-	-	-	-	-	-	-	1,600
1a.1.17.13	Plant structures & buildings	-	-	-	-	-	-	354	53	407	204	-	204	-	-	-	-	-	-	-	3,120
1a.1.17.14	Waste management	-	-	-	-	-	-	522	78	601	601	-	-	-	-	-	-	-	-	-	4,600
1a.1.17.15	Facility & site closeout	-	-	-	-	-	-	102	15	118	59	-	59	-	-	-	-	-	-	-	900
1a.1.17	Total	-	-	-	-	-	-	4,846	727	5,573	5,087	-	486	-	-	-	-	-	-	-	42,683
Planning & Site Preparations																					
1a.1.18	Prepare dismantling sequence	-	-	-	-	-	-	272	41	313	313	-	-	-	-	-	-	-	-	-	2,400
1a.1.19	Plant prep. & temp. svces	-	-	-	-	-	-	3,000	450	3,450	3,450	-	-	-	-	-	-	-	-	-	-
1a.1.20	Design water clean-up system	-	-	-	-	-	-	159	24	183	183	-	-	-	-	-	-	-	-	-	1,400
1a.1.21	Rigging/Cont. Cntrl Envlps/tooling/etc.	-	-	-	-	-	-	2,300	345	2,645	2,645	-	-	-	-	-	-	-	-	-	-
1a.1.22	Procure casks/liners & containers	-	-	-	-	-	-	140	21	161	161	-	-	-	-	-	-	-	-	-	1,230
1a.1	Subtotal Period 1a Activity Costs	-	-	-	-	-	-	14,224	2,134	16,358	15,873	-	486	-	-	-	-	-	-	-	78,609
Period 1a Collateral Costs																					
1a.3.1	Spent Fuel Capital and Transfer	-	-	-	-	-	-	34,895	5,234	40,130	-	40,130	-	-	-	-	-	-	-	-	-
1a.3	Subtotal Period 1a Collateral Costs	-	-	-	-	-	-	34,895	5,234	40,130	-	40,130	-	-	-	-	-	-	-	-	-
Period 1a Period-Dependent Costs																					
1a.4.1	Insurance	-	-	-	-	-	-	1,418	142	1,560	1,560	-	-	-	-	-	-	-	-	-	-
1a.4.2	Property taxes	-	-	-	-	-	-	2,718	272	2,990	2,990	-	-	-	-	-	-	-	-	-	-
1a.4.3	Health physics supplies	-	490	-	-	-	-	-	123	613	613	-	-	-	-	-	-	-	-	-	-
1a.4.4	Heavy equipment rental	-	528	-	-	-	-	-	79	608	608	-	-	-	-	-	-	-	-	-	-
1a.4.5	Disposal of DAW generated	-	-	13	4	-	48	-	14	79	79	-	-	-	610	-	-	-	12,190	20	-
1a.4.6	Plant energy budget	-	-	-	-	-	-	3,530	530	4,060	4,060	-	-	-	-	-	-	-	-	-	-
1a.4.7	NRC Fees	-	-	-	-	-	-	1,181	118	1,299	1,299	-	-	-	-	-	-	-	-	-	-
1a.4.8	Emergency Planning Fees	-	-	-	-	-	-	3,121	312	3,433	-	3,433	-	-	-	-	-	-	-	-	-
1a.4.9	Fixed Overhead	-	-	-	-	-	-	2,434	365	2,799	2,799	-	-	-	-	-	-	-	-	-	-
1a.4.10	Spent Fuel Pool O&M	-	-	-	-	-	-	791	119	910	-	910	-	-	-	-	-	-	-	-	-
1a.4.11	ISFSI Operating Costs	-	-	-	-	-	-	95	14	110	-	110	-	-	-	-	-	-	-	-	-
1a.4.12	Railroad Track Maintenance	-	-	-	-	-	-	107	16	123	123	-	-	-	-	-	-	-	-	-	-
1a.4.13	Security Staff Cost	-	-	-	-	-	-	5,349	802	6,151	6,151	-	-	-	-	-	-	-	-	-	157,471
1a.4.14	Utility Staff Cost	-	-	-	-	-	-	22,165	3,325	25,489	25,489	-	-	-	-	-	-	-	-	-	423,400
1a.4	Subtotal Period 1a Period-Dependent Costs	-	1,018	13	4	-	48	42,909	6,230	50,222	45,769	4,453	-	-	610	-	-	-	12,190	20	580,871
1a.0	TOTAL PERIOD 1a COST	-	1,018	13	4	-	48	92,028	13,598	106,710	61,642	44,582	486	-	610	-	-	-	12,190	20	659,480

Monticello Nuclear Generating Plant
Decommissioning Cost Analysis

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Table C
Monticello Nuclear Generating Plant
DECON 2025 DOE Fuel Pickup Decommissioning Cost Estimate
(Thousands of 2014 Dollars)

Activity Index	Activity Description	Decon Cost	Removal Cost	Packaging Costs	Transport Costs	Off-Site Processing Costs	LLRW Disposal Costs	Other Costs	Total Contingency	Total Costs	NRC Lic. Term. Costs	Spent Fuel Management Costs	Site Restoration Costs	Processed Volume Cu. Feet	Burial Volumes				Burial / Processed Wt., Lbs.	Craft Manhours	Utility and Contractor Manhours
															Class A Cu. Feet	Class B Cu. Feet	Class C Cu. Feet	GTCC Cu. Feet			
PERIOD 1b - Decommissioning Preparations																					
Period 1b Direct Decommissioning Activities																					
Detailed Work Procedures																					
1b.1.1.1	Plant systems	-	-	-	-	-	-	537	81	618	556	-	62	-	-	-	-	-	-	-	4,733
1b.1.1.2	NSSS Decontamination Flush	-	-	-	-	-	-	114	17	131	131	-	-	-	-	-	-	-	-	-	1,000
1b.1.1.3	Reactor internals	-	-	-	-	-	-	454	68	522	522	-	-	-	-	-	-	-	-	-	4,000
1b.1.1.4	Remaining buildings	-	-	-	-	-	-	153	23	176	44	-	132	-	-	-	-	-	-	-	1,350
1b.1.1.5	CRD housings & NIs	-	-	-	-	-	-	114	17	131	131	-	-	-	-	-	-	-	-	-	1,000
1b.1.1.6	Incore instrumentation	-	-	-	-	-	-	114	17	131	131	-	-	-	-	-	-	-	-	-	1,000
1b.1.1.7	Removal primary containment	-	-	-	-	-	-	227	34	261	261	-	-	-	-	-	-	-	-	-	2,000
1b.1.1.8	Reactor vessel	-	-	-	-	-	-	412	62	474	474	-	-	-	-	-	-	-	-	-	3,630
1b.1.1.9	Facility closeout	-	-	-	-	-	-	136	20	157	78	-	78	-	-	-	-	-	-	-	1,200
1b.1.1.10	Sacrificial shield	-	-	-	-	-	-	136	20	157	157	-	-	-	-	-	-	-	-	-	1,200
1b.1.1.11	Reinforced concrete	-	-	-	-	-	-	114	17	131	65	-	65	-	-	-	-	-	-	-	1,000
1b.1.1.12	Main Turbine	-	-	-	-	-	-	236	35	272	272	-	-	-	-	-	-	-	-	-	2,080
1b.1.1.13	Main Condensers	-	-	-	-	-	-	237	36	273	273	-	-	-	-	-	-	-	-	-	2,088
1b.1.1.14	Moisture separators & reheaters	-	-	-	-	-	-	227	34	261	261	-	-	-	-	-	-	-	-	-	2,000
1b.1.1.15	Radwaste building	-	-	-	-	-	-	310	46	356	321	-	36	-	-	-	-	-	-	-	2,730
1b.1.1.16	Reactor building	-	-	-	-	-	-	310	46	356	321	-	36	-	-	-	-	-	-	-	2,730
1b.1.1	Total	-	-	-	-	-	-	3,831	575	4,405	3,996	-	409	-	-	-	-	-	-	-	33,741
1b.1.2	Decon NSSS	262	-	-	-	-	-	-	131	393	393	-	-	-	-	-	-	-	-	1,067	-
1b.1	Subtotal Period 1b Activity Costs	262	-	-	-	-	-	3,831	705	4,798	4,389	-	409	-	-	-	-	-	-	1,067	33,741
Period 1b Additional Costs																					
1b.2.1	Spent fuel pool isolation	-	-	-	-	-	-	10,813	1,622	12,434	12,434	-	-	-	-	-	-	-	-	-	-
1b.2.2	Site Characterization	-	-	-	-	-	-	5,244	1,573	6,818	6,818	-	-	-	-	-	-	-	-	30,500	10,852
1b.2.3	Mixed & RCRA Waste	-	-	26	19	12	-	-	7	65	65	-	-	43	-	-	-	-	5,253	163	-
1b.2	Subtotal Period 1b Additional Costs	-	-	26	19	12	-	16,057	3,202	19,317	19,317	-	-	43	-	-	-	-	5,253	30,663	10,852
Period 1b Collateral Costs																					
1b.3.1	Decon equipment	881	-	-	-	-	-	-	132	1,013	1,013	-	-	-	-	-	-	-	-	-	-
1b.3.2	DOC staff relocation expenses	-	-	-	-	-	-	1,708	256	1,964	1,964	-	-	-	-	-	-	-	-	-	-
1b.3.3	Process decommissioning water waste	37	-	24	60	-	104	-	56	280	280	-	-	-	233	-	-	-	13,986	45	-
1b.3.4	Process decommissioning chemical flush waste	1	-	23	82	-	1,385	-	361	1,852	1,852	-	-	-	-	231	-	-	24,599	43	-
1b.3.5	Small tool allowance	-	2	-	-	-	-	-	0	2	2	-	-	-	-	-	-	-	-	-	-
1b.3.6	Pipe cutting equipment	-	1,100	-	-	-	-	-	165	1,265	1,265	-	-	-	-	-	-	-	-	-	-
1b.3.7	Decon rig	1,500	-	-	-	-	-	-	225	1,725	1,725	-	-	-	-	-	-	-	-	-	-
1b.3	Subtotal Period 1b Collateral Costs	2,418	1,102	47	142	-	1,489	1,708	1,195	8,101	8,101	-	-	-	233	231	-	-	38,585	89	-
Period 1b Period-Dependent Costs																					
1b.4.1	Decon supplies	27	-	-	-	-	-	-	7	34	34	-	-	-	-	-	-	-	-	-	-
1b.4.2	Insurance	-	-	-	-	-	-	711	71	782	782	-	-	-	-	-	-	-	-	-	-
1b.4.3	Property taxes	-	-	-	-	-	-	1,339	134	1,472	1,472	-	-	-	-	-	-	-	-	-	-
1b.4.4	Health physics supplies	-	276	-	-	-	-	-	69	345	345	-	-	-	-	-	-	-	-	-	-
1b.4.5	Heavy equipment rental	-	265	-	-	-	-	-	40	305	305	-	-	-	-	-	-	-	-	-	-
1b.4.6	Disposal of DAW generated	-	-	7	3	-	28	-	8	46	46	-	-	-	358	-	-	-	7,159	12	-
1b.4.7	Plant energy budget	-	-	-	-	-	-	3,540	531	4,071	4,071	-	-	-	-	-	-	-	-	-	-
1b.4.8	NRC Fees	-	-	-	-	-	-	346	35	381	381	-	-	-	-	-	-	-	-	-	-
1b.4.9	Emergency Planning Fees	-	-	-	-	-	-	1,565	156	1,721	-	1,721	-	-	-	-	-	-	-	-	-
1b.4.10	Fixed Overhead	-	-	-	-	-	-	1,220	183	1,403	1,403	-	-	-	-	-	-	-	-	-	-
1b.4.11	Spent Fuel Pool O&M	-	-	-	-	-	-	397	59	456	-	456	-	-	-	-	-	-	-	-	-
1b.4.12	ISFSI Operating Costs	-	-	-	-	-	-	48	7	55	-	55	-	-	-	-	-	-	-	-	-
1b.4.13	Railroad Track Maintenance	-	-	-	-	-	-	53	8	62	62	-	-	-	-	-	-	-	-	-	-
1b.4.14	Security Staff Cost	-	-	-	-	-	-	2,682	402	3,084	3,084	-	-	-	-	-	-	-	-	-	78,951
1b.4.15	DOC Staff Cost	-	-	-	-	-	-	4,755	713	5,468	5,468	-	-	-	-	-	-	-	-	-	63,789
1b.4.16	Utility Staff Cost	-	-	-	-	-	-	11,170	1,675	12,845	12,845	-	-	-	-	-	-	-	-	-	213,326
1b.4	Subtotal Period 1b Period-Dependent Costs	27	541	7	3	-	28	27,824	4,099	32,530	30,297	2,232	-	-	358	-	-	-	7,159	12	356,066
1b.0	TOTAL PERIOD 1b COST	2,707	1,643	80	164	12	1,517	49,419	9,203	64,745	62,103	2,232	409	43	591	231	-	-	50,997	31,830	400,659
PERIOD 1 TOTALS		2,707	2,661	93	168	12	1,565	141,448	22,801	171,455	123,745	46,815	894	43	1,201	231	-	-	63,188	31,850	1,060,139

Monticello Nuclear Generating Plant
Decommissioning Cost Analysis

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Table C
Monticello Nuclear Generating Plant
DECON 2025 DOE Fuel Pickup Decommissioning Cost Estimate
(Thousands of 2014 Dollars)

Activity Index	Activity Description	Decon Cost	Removal Cost	Packaging Costs	Transport Costs	Off-Site Processing Costs	LLRW Disposal Costs	Other Costs	Total Contingency	Total Costs	NRC Lic. Term. Costs	Spent Fuel Management Costs	Site Restoration Costs	Processed Volume Cu. Feet	Burial Volumes				Burial / Processed Wt., Lbs.	Craft Manhours	Utility and Contractor Manhours
															Class A Cu. Feet	Class B Cu. Feet	Class C Cu. Feet	GTCC Cu. Feet			
PERIOD 2a - Large Component Removal																					
Period 2a Direct Decommissioning Activities																					
Nuclear Steam Supply System Removal																					
2a.1.1.1	Recirculation System Piping & Valves	92	78	17	22	-	407	-	172	789	789	-	-	-	858	-	-	-	98,047	2,888	-
2a.1.1.2	Recirculation Pumps & Motors	33	52	15	37	21	423	-	146	727	727	-	-	96	945	-	-	-	112,200	1,563	-
2a.1.1.3	CRDMs & NIs Removal	162	857	400	98	-	887	-	572	2,976	2,976	-	-	-	3,741	-	-	-	213,700	17,768	-
2a.1.1.4	Reactor Vessel Internals	193	3,392	15,478	2,739	-	19,466	309	16,974	58,552	58,552	-	-	-	1,252	1,481	1,010	-	312,338	27,675	1,239
2a.1.1.5	Reactor Vessel	94	7,234	2,229	976	-	3,459	309	8,050	22,352	22,352	-	-	-	10,736	-	-	-	1,089,965	27,675	1,239
2a.1.1	Totals	574	11,614	18,139	3,873	21	24,642	619	25,914	85,396	85,396	-	-	96	17,532	1,481	1,010	-	1,826,250	77,569	2,478
Removal of Major Equipment																					
2a.1.2	Main Turbine/Generator	-	326	1,455	390	3,137	352	-	844	6,504	6,504	-	-	25,377	1,413	-	-	-	1,616,032	5,557	-
2a.1.3	Main Condensers	-	1,109	379	140	1,613	199	-	628	4,067	4,067	-	-	17,396	727	-	-	-	830,822	18,831	-
Cascading Costs from Clean Building Demolition																					
2a.1.4.1	Reactor Building	-	611	-	-	-	-	-	92	703	703	-	-	-	-	-	-	-	-	6,238	-
2a.1.4.2	Radwaste	-	53	-	-	-	-	-	8	61	61	-	-	-	-	-	-	-	-	569	-
2a.1.4.3	Turbine	-	157	-	-	-	-	-	24	180	180	-	-	-	-	-	-	-	-	1,884	-
2a.1.4	Totals	-	821	-	-	-	-	-	123	944	944	-	-	-	-	-	-	-	-	8,691	-
Disposal of Plant Systems																					
2a.1.5.1	Automatic Press Relief	-	98	6	8	67	57	-	51	287	287	-	-	803	206	-	-	-	46,236	1,656	-
2a.1.5.2	Chemistry Sampling	-	23	1	2	13	10	-	11	59	59	-	-	156	37	-	-	-	8,774	400	-
2a.1.5.3	Chemistry Sampling - Insulated	-	1	0	0	-	0	-	0	2	2	-	-	-	1	-	-	-	73	28	-
2a.1.5.4	Circulating Water - RCA	-	172	10	44	557	-	-	134	917	917	-	-	6,656	-	-	-	-	270,307	2,860	-
2a.1.5.5	Combustible Gas Control - Insul - RCA	-	24	0	1	18	-	-	9	53	53	-	-	212	-	-	-	-	8,617	378	-
2a.1.5.6	Combustible Gas Control - RCA	-	15	0	2	24	-	-	8	49	49	-	-	285	-	-	-	-	11,577	245	-
2a.1.5.7	Condensate & Feedwater	-	818	178	244	1,669	2,008	-	1,011	5,929	5,929	-	-	19,947	7,319	-	-	-	1,293,969	14,196	-
2a.1.5.8	Condensate & Feedwater - Insulated	-	408	33	46	349	331	-	247	1,414	1,414	-	-	4,176	1,207	-	-	-	249,413	6,964	-
2a.1.5.9	Condensate Demin	-	451	28	37	280	274	-	232	1,303	1,303	-	-	3,346	1,000	-	-	-	201,994	7,618	-
2a.1.5.10	Condensate Storage	-	604	29	60	597	216	-	306	1,811	1,811	-	-	7,131	795	-	-	-	341,719	10,345	-
2a.1.5.11	Control Rod Drive	-	2	0	0	2	1	-	1	7	7	-	-	19	4	-	-	-	1,015	41	-
2a.1.5.12	Control Rod Drive Hydraulic	-	344	15	20	139	154	-	150	822	822	-	-	1,658	562	-	-	-	104,537	5,898	-
2a.1.5.13	Core Spray	-	66	18	37	367	143	-	115	745	745	-	-	4,384	521	-	-	-	212,510	1,163	-
2a.1.5.14	Core Spray - Insulated	-	120	7	9	68	72	-	60	338	338	-	-	818	264	-	-	-	50,680	2,033	-
2a.1.5.15	Demin Water - Insulated - RCA	-	12	0	1	7	-	-	4	24	24	-	-	85	-	-	-	-	3,445	181	-
2a.1.5.16	Demin Water - RCA	-	34	0	2	21	-	-	12	69	69	-	-	253	-	-	-	-	10,278	508	-
2a.1.5.17	Diesel Oil - RCA	-	2	0	0	2	-	-	1	4	4	-	-	23	-	-	-	-	931	25	-
2a.1.5.18	Drywell Atmosphere Cooling - RCA	-	31	1	4	46	-	-	15	97	97	-	-	548	-	-	-	-	22,244	550	-
2a.1.5.19	EDG Emerg Service Water - Insul - RCA	-	0	0	0	0	-	-	0	1	1	-	-	2	-	-	-	-	84	4	-
2a.1.5.20	Electrical - Clean	-	11	-	-	-	-	-	2	12	-	-	12	-	-	-	-	-	-	182	-
2a.1.5.21	Emergency Service Water - Insul - RCA	-	18	0	1	11	-	-	6	37	37	-	-	137	-	-	-	-	5,544	281	-
2a.1.5.22	Emergency Service Water - RCA	-	1	0	0	1	-	-	1	3	3	-	-	13	-	-	-	-	512	22	-
2a.1.5.23	GEZIP - RCA	-	3	0	1	9	-	-	2	14	14	-	-	103	-	-	-	-	4,184	48	-
2a.1.5.24	Generator Physical Design - RCA	-	4	0	0	3	-	-	1	8	8	-	-	31	-	-	-	-	1,250	67	-
2a.1.5.25	H2-O2 Control Analyzing	-	5	0	0	0	4	-	2	12	12	-	-	6	13	-	-	-	1,089	81	-
2a.1.5.26	H2-O2 Control Analyzing - Insulated	-	5	0	0	0	4	-	2	12	12	-	-	6	13	-	-	-	1,089	81	-
2a.1.5.27	High Pressure Coolant Injection	-	56	6	10	81	57	-	42	252	252	-	-	972	209	-	-	-	53,266	966	-
2a.1.5.28	High Pressure Coolant Injection - Insula	-	182	13	18	134	132	-	103	582	582	-	-	1,598	481	-	-	-	96,733	3,079	-
2a.1.5.29	Hydrogen Cooling	-	7	-	-	-	-	-	1	8	-	-	8	-	-	-	-	-	-	118	-
2a.1.5.30	Hydrogen Cooling - RCA	-	6	0	0	3	-	-	2	11	11	-	-	39	-	-	-	-	1,600	79	-
2a.1.5.31	Hydrogen Seal Oil - RCA	-	14	0	1	16	-	-	6	38	38	-	-	189	-	-	-	-	7,669	212	-
2a.1.5.32	Hydrogen Water Chemistry - RCA	-	20	0	1	12	-	-	7	40	40	-	-	140	-	-	-	-	5,672	304	-
2a.1.5.33	Instrument & Service Air - RCA	-	185	3	12	148	-	-	71	418	418	-	-	1,768	-	-	-	-	71,810	2,733	-
2a.1.5.34	Main Condenser	-	162	11	15	112	113	-	89	502	502	-	-	1,333	411	-	-	-	81,311	2,746	-
2a.1.5.35	Main Steam	-	206	16	23	180	163	-	124	712	712	-	-	2,148	594	-	-	-	126,485	3,512	-
2a.1.5.36	Main Turbine	-	839	203	263	1,653	2,383	-	1,113	6,454	6,454	-	-	19,760	8,687	-	-	-	1,376,578	14,733	-
2a.1.5.37	Main Turbine - Insulated	-	178	17	27	212	183	-	128	745	745	-	-	2,530	667	-	-	-	146,839	3,069	-
2a.1.5.38	Miscellaneous	-	35	0	2	25	-	-	13	76	76	-	-	302	-	-	-	-	12,283	622	-
2a.1.5.39	Off Gas Recombiner	-	157	18	24	150	210	-	120	678	678	-	-	1,795	764	-	-	-	123,437	2,708	-
2a.1.5.40	Off Gas Recombiner - Insulated	-	320	18	20	114	195	-	151	818	818	-	-	1,366	709	-	-	-	102,395	5,385	-
2a.1.5.41	Post Accident Sampling	-	21	1	1	4	9	-	8	44	44	-	-	53	33	-	-	-	4,355	345	-
2a.1.5.42	Post Accident Sampling - Insulated	-	14	1	1	1	10	-	6	34	34	-	-	17	37	-	-	-	3,143	212	-
2a.1.5.43	RHR Service Water - Insulated - RCA	-	69	2	10	124	-	-	37	242	242	-	-	1,485	-	-	-	-	60,293	1,125	-
2a.1.5.44	RHR Service Water - RCA	-	3	0	0	3	-	-	1	8	8	-	-	35	-	-	-	-	1,410	57	-
2a.1.5.45	Reactor Feedwater Pump Seal	-	46	2	3	16	26	-	21	115	115	-	-	193	96	-	-	-	14,222	773	-
2a.1.5.46	Residual Heat Removal	320	209	162	134	536	1,653	-	742	3,755	3,755	-	-	6,406	6,012	-	-	-	658,423	4,135	-

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DECON 2025 DOE Fuel Pickup Decommissioning Cost Estimate
(Thousands of 2014 Dollars)

Activity Index	Activity Description	Decon Cost	Removal Cost	Packaging Costs	Transport Costs	Off-Site Processing Costs	LLRW Disposal Costs	Other Costs	Total Contingency	Total Costs	NRC Lic. Term. Costs	Spent Fuel Management Costs	Site Restoration Costs	Processed Volume Cu. Feet	Burial Volumes				Burial / Processed Wt., Lbs.	Craft Manhours	Utility and Contractor Manhours
															Class A Cu. Feet	Class B Cu. Feet	Class C Cu. Feet	GTCC Cu. Feet			
Disposal of Plant Systems (continued)																					
2a.1.5.47	Residual Heat Removal - Insulated	542	461	61	62	282	716	-	623	2,746	2,746	-	-	3,367	2,607	-	-	-	309,163	10,340	-
2a.1.5.48	Rx Core Isolation Cooling	-	40	2	3	22	21	-	19	107	107	-	-	259	76	-	-	-	15,537	691	-
2a.1.5.49	Rx Core Isolation Cooling - Insulated	-	89	5	5	24	54	-	41	218	218	-	-	288	198	-	-	-	24,804	1,479	-
2a.1.5.50	Rx Recirculation	47	48	5	3	4	52	-	50	210	210	-	-	43	190	-	-	-	14,353	1,580	-
2a.1.5.51	Snubbers	-	141	2	4	32	25	-	47	251	251	-	-	377	90	-	-	-	21,240	2,548	-
2a.1.5.52	Standby Liquid Control - Insul - RCA	-	3	0	0	2	-	-	1	6	6	-	-	22	-	-	-	-	904	48	-
2a.1.5.53	Standby Liquid Control - RCA	-	22	0	2	21	-	-	9	53	53	-	-	245	-	-	-	-	9,969	341	-
2a.1.5.54	Stator Cooling - RCA	-	6	0	1	11	-	-	3	21	21	-	-	126	-	-	-	-	5,135	98	-
2a.1.5.55	Traversing Incore Probe	0	3	0	0	0	2	-	1	6	6	-	-	1	5	-	-	-	390	51	-
2a.1.5	Totals	909	6,814	882	1,164	8,170	9,278	-	5,964	33,181	33,161	-	20	97,654	33,808	-	-	-	6,201,492	119,943	-
2a.1.6	Scaffolding in support of decommissioning	-	1,911	24	9	95	25	-	502	2,566	2,566	-	-	1,030	91	-	-	-	52,344	22,564	-
2a.1	Subtotal Period 2a Activity Costs	1,483	22,596	20,878	5,575	13,035	34,496	619	33,975	132,658	132,638	-	20	141,552	53,571	1,481	1,010	-	10,526,940	253,155	2,478
Period 2a Additional Costs																					
2a.2.1	Remedial Action Surveys	-	-	-	-	-	-	1,343	403	1,746	1,746	-	-	-	-	-	-	-	-	27,506	-
2a.2	Subtotal Period 2a Additional Costs	-	-	-	-	-	-	1,343	403	1,746	1,746	-	-	-	-	-	-	-	-	27,506	-
Period 2a Collateral Costs																					
2a.3.1	Process decommissioning water waste	84	-	55	139	-	239	-	128	645	645	-	-	-	538	-	-	-	32,290	105	-
2a.3.2	Process decommissioning chemical flush waste	5	-	206	746	-	1,652	-	548	3,157	3,157	-	-	-	2,093	-	-	-	223,008	392	-
2a.3.3	Small tool allowance	-	270	-	-	-	-	-	41	311	280	-	31	-	-	-	-	-	-	-	-
2a.3.4	On-site survey and release of 0.0 tons clean metallic waste	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2a.3	Subtotal Period 2a Collateral Costs	89	270	261	884	-	1,892	-	717	4,113	4,082	-	31	-	2,631	-	-	-	255,298	497	-
Period 2a Period-Dependent Costs																					
2a.4.1	Decon supplies	71	-	-	-	-	-	-	18	89	89	-	-	-	-	-	-	-	-	-	-
2a.4.2	Insurance	-	-	-	-	-	-	777	78	854	854	-	-	-	-	-	-	-	-	-	-
2a.4.3	Property taxes	-	-	-	-	-	-	3,365	336	3,701	3,331	-	370	-	-	-	-	-	-	-	-
2a.4.4	Health physics supplies	-	1,940	-	-	-	-	-	485	2,425	2,425	-	-	-	-	-	-	-	-	-	-
2a.4.5	Heavy equipment rental	-	2,687	-	-	-	-	-	403	3,090	3,090	-	-	-	-	-	-	-	-	-	-
2a.4.6	Disposal of DAW generated	-	-	112	39	-	424	-	123	699	699	-	-	-	5,394	-	-	-	107,886	176	-
2a.4.7	Plant energy budget	-	-	-	-	-	-	4,438	666	5,103	5,103	-	-	-	-	-	-	-	-	-	-
2a.4.8	NRC Fees	-	-	-	-	-	-	829	83	911	911	-	-	-	-	-	-	-	-	-	-
2a.4.9	Emergency Planning Fees	-	-	-	-	-	-	3,399	340	3,739	-	3,739	-	-	-	-	-	-	-	-	-
2a.4.10	Fixed Overhead	-	-	-	-	-	-	2,459	369	2,827	2,827	-	-	-	-	-	-	-	-	-	-
2a.4.11	Spent Fuel Pool O&M	-	-	-	-	-	-	1,047	157	1,204	-	1,204	-	-	-	-	-	-	-	-	-
2a.4.12	ISFSI Operating Costs	-	-	-	-	-	-	126	19	145	-	145	-	-	-	-	-	-	-	-	-
2a.4.13	Railroad Track Maintenance	-	-	-	-	-	-	141	21	162	162	-	-	-	-	-	-	-	-	-	-
2a.4.14	Security Staff Cost	-	-	-	-	-	-	6,002	900	6,902	6,902	-	-	-	-	-	-	-	-	-	174,570
2a.4.15	DOC Staff Cost	-	-	-	-	-	-	15,225	2,284	17,509	17,509	-	-	-	-	-	-	-	-	-	209,760
2a.4.16	Utility Staff Cost	-	-	-	-	-	-	21,262	3,189	24,451	24,451	-	-	-	-	-	-	-	-	-	390,540
2a.4	Subtotal Period 2a Period-Dependent Costs	71	4,627	112	39	-	424	59,068	9,471	73,813	68,355	5,088	370	-	5,394	-	-	-	107,886	176	774,870
2a.0	TOTAL PERIOD 2a COST	1,643	27,494	21,252	6,499	13,035	36,812	61,030	44,566	212,330	206,821	5,088	421	141,552	61,596	1,481	1,010	-	10,890,130	281,333	777,348
PERIOD 2b - Site Decontamination																					
Period 2b Direct Decommissioning Activities																					
Disposal of Plant Systems																					
2b.1.1.1	ALARA/Radiological	-	15	0	0	3	3	-	5	27	27	-	-	35	10	-	-	-	2,083	277	-
2b.1.1.2	Alternate N2 - RCA	-	13	0	1	8	-	-	5	27	27	-	-	93	-	-	-	-	3,765	185	-
2b.1.1.3	Decontamination Projects	-	1	0	0	0	0	-	0	2	2	-	-	2	0	-	-	-	130	17	-
2b.1.1.4	Electrical - Contaminated	-	366	5	17	200	25	-	131	744	744	-	-	2,389	90	-	-	-	102,957	6,325	-
2b.1.1.5	Electrical - Decontaminated	-	2,195	36	156	1,953	-	-	869	5,208	5,208	-	-	23,344	-	-	-	-	948,013	37,107	-
2b.1.1.6	Fire - RCA	-	84	1	4	51	-	-	29	169	169	-	-	614	-	-	-	-	24,917	1,324	-
2b.1.1.7	HVAC Ductwork	-	263	6	19	223	28	-	110	649	649	-	-	2,665	100	-	-	-	114,856	4,111	-
2b.1.1.8	HVAC/Chilled Water - RCA	-	267	4	18	230	-	-	104	624	624	-	-	2,752	-	-	-	-	111,779	3,985	-
2b.1.1.9	Heating & Ventilation	-	401	14	44	503	62	-	199	1,224	1,224	-	-	6,018	227	-	-	-	259,372	7,101	-
2b.1.1.10	Heating Boiler - Insulated - RCA	-	2	0	0	2	-	-	1	5	5	-	-	26	-	-	-	-	1,058	35	-
2b.1.1.11	Liquid Radwaste	494	571	44	46	257	468	-	557	2,437	2,437	-	-	3,073	1,728	-	-	-	237,560	17,194	-
2b.1.1.12	Makeup Demin - RCA	-	86	2	10	123	-	-	42	263	263	-	-	1,471	-	-	-	-	59,747	1,412	-
2b.1.1.13	Non-Essential Diesel Generator - RCA	-	23	2	9	119	-	-	25	179	179	-	-	1,424	-	-	-	-	57,832	395	-
2b.1.1.14	Off Gas Holdup	-	283	19	28	230	172	-	155	888	888	-	-	2,755	630	-	-	-	153,412	4,769	-
2b.1.1.15	Primary Containment	-	378	40	64	519	413	-	289	1,703	1,703	-	-	6,201	1,506	-	-	-	351,391	6,454	-
2b.1.1.16	Process Radiation Monitors	-	38	2	2	12	14	-	15	83	83	-	-	142	52	-	-	-	9,195	649	-

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Table C
Monticello Nuclear Generating Plant
DECON 2025 DOE Fuel Pickup Decommissioning Cost Estimate
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Activity Index	Activity Description	Decon Cost	Removal Cost	Packaging Costs	Transport Costs	Off-Site	LLRW	Other Costs	Total Contingency	Total Costs	NRC	Spent Fuel Management Costs	Site Restoration Costs	Processed Volume Cu. Feet	Burial Volumes				Burial /	Craft Manhours	Utility and
						Processing Costs	Disposal Costs				Lic. Term. Costs				Class A Cu. Feet	Class B Cu. Feet	Class C Cu. Feet	GTCC Cu. Feet	Processed Wt., Lbs.		Contractor Manhours
Disposal of Plant Systems (continued)																					
2b.1.1.17	Rx Bldg Closed Cng Water - Insul - RCA	-	93	2	7	82	-	-	37	220	220	-	-	977	-	-	-	-	39,675	1,484	-
2b.1.1.18	Rx Bldg Closed Cng Water - RCA	-	152	11	47	593	-	-	135	938	938	-	-	7,093	-	-	-	-	288,031	2,489	-
2b.1.1.19	Rx Component Handling Equip	23	117	18	20	97	228	-	117	621	621	-	-	1,158	829	-	-	-	101,862	2,462	-
2b.1.1.20	Rx Pressure Vessel	23	39	5	4	6	63	-	39	181	181	-	-	75	230	-	-	-	18,281	1,051	-
2b.1.1.21	Rx Water Cleanup	145	220	18	12	11	202	-	184	793	793	-	-	130	737	-	-	-	54,051	5,736	-
2b.1.1.22	Secondary Containment	-	103	7	11	85	70	-	58	334	334	-	-	1,017	255	-	-	-	58,151	1,763	-
2b.1.1.23	Service & Seal Water - Insulated - RCA	-	99	2	8	99	-	-	41	249	249	-	-	1,180	-	-	-	-	47,917	1,565	-
2b.1.1.24	Service & Seal Water - RCA	-	131	3	12	151	-	-	58	355	355	-	-	1,809	-	-	-	-	73,453	2,016	-
2b.1.1.25	Service Air Blower - RCA	-	13	0	1	17	-	-	6	38	38	-	-	206	-	-	-	-	8,364	206	-
2b.1.1.26	Solid Radwaste	285	409	34	37	200	375	-	378	1,718	1,718	-	-	2,387	1,380	-	-	-	187,377	10,820	-
2b.1.1.27	Structures & Buildings	-	64	2	4	30	23	-	27	151	151	-	-	357	85	-	-	-	20,152	1,128	-
2b.1.1.28	Wells & Domestic Water	-	8	-	-	-	-	-	1	9	-	-	9	-	-	-	-	-	-	144	-
2b.1.1.29	Wells & Domestic Water - RCA	-	43	1	2	29	-	-	15	90	90	-	-	342	-	-	-	-	13,874	633	-
2b.1.1	Totals	971	6,479	280	584	5,834	2,147	-	3,632	19,926	19,917	-	9	69,735	7,859	-	-	-	3,349,255	122,835	-
2b.1.2	Scaffolding in support of decommissioning	-	2,389	29	11	119	31	-	628	3,208	3,208	-	-	1,287	114	-	-	-	65,430	28,205	-
Decontamination of Site Buildings																					
2b.1.3.1	Reactor Building	4,343	2,430	138	368	4,022	978	-	3,696	15,975	15,975	-	-	48,077	4,667	-	-	-	2,318,995	112,507	-
2b.1.3.2	Admin	91	5	0	2	-	13	-	50	161	161	-	-	-	79	-	-	-	6,840	1,599	-
2b.1.3.3	HPCI Room	24	24	0	2	10	12	-	23	96	96	-	-	118	70	-	-	-	10,760	789	-
2b.1.3.4	Hot Shop	14	4	0	1	-	9	-	11	39	39	-	-	-	56	-	-	-	4,860	286	-
2b.1.3.5	LLRW Storage & Shipping	49	21	1	5	3	39	-	41	159	159	-	-	31	237	-	-	-	21,708	1,126	-
2b.1.3.6	Offgas Stack	315	228	5	16	112	70	-	252	998	998	-	-	1,343	388	-	-	-	87,082	8,859	-
2b.1.3.7	Offgas Storage & Compressor	35	15	0	4	2	29	-	29	114	114	-	-	25	173	-	-	-	15,948	785	-
2b.1.3.8	Radwaste	103	53	2	12	14	83	-	90	357	357	-	-	172	501	-	-	-	49,943	2,501	-
2b.1.3.9	Radwaste Material Storage Warehouse	54	21	1	6	-	45	-	45	171	171	-	-	-	270	-	-	-	23,400	1,196	-
2b.1.3.10	Recombiner	23	21	1	4	17	21	-	25	111	111	-	-	199	121	-	-	-	18,405	695	-
2b.1.3.11	Turbine	601	304	10	72	107	489	-	526	2,109	2,109	-	-	1,283	2,912	-	-	-	303,150	14,432	-
2b.1.3.12	Turbine Building Addition	50	18	1	5	-	39	-	40	153	153	-	-	-	236	-	-	-	20,478	1,086	-
2b.1.3	Totals	5,701	3,143	159	498	4,287	1,828	-	4,827	20,443	20,443	-	-	51,247	9,710	-	-	-	2,881,569	145,859	-
2b.1	Subtotal Period 2b Activity Costs	6,673	12,012	467	1,093	10,240	4,006	-	9,087	43,578	43,568	-	9	122,269	17,682	-	-	-	6,296,255	296,899	-
Period 2b Additional Costs																					
2b.2.1	Remedial Action Surveys	-	-	-	-	-	-	2,259	678	2,936	2,936	-	-	-	-	-	-	-	-	46,242	-
2b.2.2	Operational Equipment	-	-	17	66	603	-	-	102	788	788	-	-	11,710	-	-	-	-	292,750	32	-
2b.2	Subtotal Period 2b Additional Costs	-	-	17	66	603	-	2,259	780	3,724	3,724	-	-	11,710	-	-	-	-	292,750	46,274	-
Period 2b Collateral Costs																					
2b.3.1	Process decommissioning water waste	172	-	115	291	-	501	-	266	1,345	1,345	-	-	-	1,127	-	-	-	67,647	220	-
2b.3.2	Process decommissioning chemical flush waste	1	-	41	147	-	326	-	108	623	623	-	-	-	413	-	-	-	43,978	77	-
2b.3.3	Small tool allowance	-	286	-	-	-	-	-	43	329	329	-	-	-	-	-	-	-	-	-	-
2b.3.4	Spent Fuel Capital and Transfer	-	-	-	-	-	-	26,973	4,046	31,019	-	31,019	-	-	-	-	-	-	-	-	-
2b.3.5	On-site survey and release of 0.0 tons clean metallic waste	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2b.3	Subtotal Period 2b Collateral Costs	173	286	156	438	-	827	26,973	4,463	33,316	2,297	31,019	-	-	1,540	-	-	-	111,625	297	-
Period 2b Period-Dependent Costs																					
2b.4.1	Decon supplies	1,063	-	-	-	-	-	-	266	1,328	1,328	-	-	-	-	-	-	-	-	-	-
2b.4.2	Insurance	-	-	-	-	-	-	1,306	131	1,437	1,437	-	-	-	-	-	-	-	-	-	-
2b.4.3	Property taxes	-	-	-	-	-	-	5,191	519	5,710	5,710	-	-	-	-	-	-	-	-	-	-
2b.4.4	Health physics supplies	-	2,659	-	-	-	-	-	665	3,324	3,324	-	-	-	-	-	-	-	-	-	-
2b.4.5	Heavy equipment rental	-	4,472	-	-	-	-	-	671	5,143	5,143	-	-	-	-	-	-	-	-	-	-
2b.4.6	Disposal of DAW generated	-	-	121	42	-	456	-	132	752	752	-	-	-	5,805	-	-	-	116,095	189	-
2b.4.7	Plant energy budget	-	-	-	-	-	-	5,890	883	6,773	6,773	-	-	-	-	-	-	-	-	-	-
2b.4.8	NRC Fees	-	-	-	-	-	-	1,393	139	1,532	1,532	-	-	-	-	-	-	-	-	-	-
2b.4.9	Emergency Planning Fees	-	-	-	-	-	-	5,714	571	6,285	-	6,285	-	-	-	-	-	-	-	-	-
2b.4.10	Fixed Overhead	-	-	-	-	-	-	4,133	620	4,753	4,753	-	-	-	-	-	-	-	-	-	-
2b.4.11	Spent Fuel Pool O&M	-	-	-	-	-	-	1,760	264	2,024	-	2,024	-	-	-	-	-	-	-	-	-
2b.4.12	Liquid Radwaste Processing Equipment/Services	-	-	-	-	-	-	446	67	513	513	-	-	-	-	-	-	-	-	-	-
2b.4.13	ISFSI Operating Costs	-	-	-	-	-	-	212	32	244	-	244	-	-	-	-	-	-	-	-	-
2b.4.14	Railroad Track Maintenance	-	-	-	-	-	-	237	36	273	273	-	-	-	-	-	-	-	-	-	-
2b.4.15	Security Staff Cost	-	-	-	-	-	-	10,090	1,514	11,604	11,604	-	-	-	-	-	-	-	-	-	293,480
2b.4.16	DOC Staff Cost	-	-	-	-	-	-	24,752	3,713	28,465	28,465	-	-	-	-	-	-	-	-	-	338,720
2b.4.17	Utility Staff Cost	-	-	-	-	-	-	34,504	5,176	39,680	39,680	-	-	-	-	-	-	-	-	-	628,720
2b.4	Subtotal Period 2b Period-Dependent Costs	1,063	7,131	121	42	-	456	95,629	15,398	119,840	111,287	8,553	-	-	5,805	-	-	-	116,095	189	1,260,920
2b.0	TOTAL PERIOD 2b COST	7,908	19,430	762	1,639	10,843	5,289	124,860	29,727	200,458	160,877	39,572	9	133,979	25,027	-	-	-	6,816,725	343,660	1,260,920

Monticello Nuclear Generating Plant
Decommissioning Cost Analysis

Table C
Monticello Nuclear Generating Plant
DECON 2025 DOE Fuel Pickup Decommissioning Cost Estimate
(Thousands of 2014 Dollars)

Activity Index	Activity Description	Decon Cost	Removal Cost	Packaging Costs	Transport Costs	Off-Site Processing Costs	LLRW Disposal Costs	Other Costs	Total Contingency	Total Costs	NRC Lic. Term. Costs	Spent Fuel Management Costs	Site Restoration Costs	Processed Volume Cu. Feet	Burial Volumes				Burial / Processed Wt., Lbs.	Craft Manhours	Utility and Contractor Manhours
															Class A Cu. Feet	Class B Cu. Feet	Class C Cu. Feet	GTCC Cu. Feet			
PERIOD 2c - Spent fuel delay prior to SFP decon																					
Period 2c Direct Decommissioning Activities																					
Period 2c Collateral Costs																					
2c.3.1	Spent Fuel Capital and Transfer	-	-	-	-	-	-	34,726	5,209	39,935	-	39,935	-	-	-	-	-	-	-	-	-
2c.3	Subtotal Period 2c Collateral Costs	-	-	-	-	-	-	34,726	5,209	39,935	-	39,935	-	-	-	-	-	-	-	-	-
Period 2c Period-Dependent Costs																					
2c.4.1	Insurance	-	-	-	-	-	-	5,848	585	6,432	6,432	-	-	-	-	-	-	-	-	-	-
2c.4.2	Property taxes	-	-	-	-	-	-	15,696	1,570	17,265	17,265	-	-	-	-	-	-	-	-	-	-
2c.4.3	Health physics supplies	-	1,958	-	-	-	-	-	490	2,448	2,448	-	-	-	-	-	-	-	-	-	-
2c.4.4	Disposal of DAW generated	-	-	86	30	-	323	-	94	532	532	-	-	-	4,110	-	-	-	82,199	134	-
2c.4.5	Plant energy budget	-	-	-	-	-	-	7,033	1,055	8,088	8,088	-	-	-	-	-	-	-	-	-	-
2c.4.6	NRC Fees	-	-	-	-	-	-	2,883	288	3,171	3,171	-	-	-	-	-	-	-	-	-	-
2c.4.7	Emergency Planning Fees	-	-	-	-	-	-	25,586	2,559	28,145	-	28,145	-	-	-	-	-	-	-	-	-
2c.4.8	Fixed Overhead	-	-	-	-	-	-	18,508	2,776	21,285	21,285	-	-	-	-	-	-	-	-	-	-
2c.4.9	Spent Fuel Pool O&M	-	-	-	-	-	-	7,880	1,182	9,062	-	9,062	-	-	-	-	-	-	-	-	-
2c.4.10	Liquid Radwaste Processing Equipment/Services	-	-	-	-	-	-	399	60	459	459	-	-	-	-	-	-	-	-	-	-
2c.4.11	ISFSI Operating Costs	-	-	-	-	-	-	951	143	1,094	-	1,094	-	-	-	-	-	-	-	-	-
2c.4.12	Railroad Track Maintenance	-	-	-	-	-	-	1,063	159	1,222	1,222	-	-	-	-	-	-	-	-	-	-
2c.4.13	Security Staff Cost	-	-	-	-	-	-	38,571	5,786	44,356	22,178	22,178	-	-	-	-	-	-	-	-	1,106,383
2c.4.14	Utility Staff Cost	-	-	-	-	-	-	44,188	6,628	50,817	25,408	25,408	-	-	-	-	-	-	-	-	820,697
2c.4	Subtotal Period 2c Period-Dependent Costs	-	1,958	86	30	-	323	168,606	23,374	194,376	108,489	85,887	-	-	4,110	-	-	-	82,199	134	1,927,080
2c.0	TOTAL PERIOD 2c COST	-	1,958	86	30	-	323	203,332	28,583	234,311	108,489	125,822	-	-	4,110	-	-	-	82,199	134	1,927,080
PERIOD 2d - Decontamination Following Wet Fuel Storage																					
Period 2d Direct Decommissioning Activities																					
2d.1.1	Remove spent fuel racks	557	49	108	116	-	2,099	-	844	3,772	3,772	-	-	-	7,653	-	-	-	505,842	906	-
Disposal of Plant Systems																					
2d.1.2.1	Cranes/Heavy Loads/Rigging - RCA	-	3	0	1	9	-	-	2	14	14	-	-	103	-	-	-	-	4,184	48	-
2d.1.2.2	Electrical - Contaminated Fuel Pool	-	38	1	2	20	2	-	14	77	77	-	-	240	9	-	-	-	10,357	665	-
2d.1.2.3	Electrical - Decontam. Fuel Pool Area	-	242	4	16	206	-	-	94	562	562	-	-	2,457	-	-	-	-	99,783	4,090	-
2d.1.2.4	Fire - RCA - Fuel Pool Area	-	9	0	0	5	-	-	3	18	18	-	-	62	-	-	-	-	2,499	143	-
2d.1.2.5	Fuel Pool Cooling & Cleanup	210	354	33	28	99	368	-	308	1,399	1,399	-	-	1,179	1,341	-	-	-	136,502	8,380	-
2d.1.2.6	Fuel Pool Cooling & Cleanup - Insulated	23	34	3	2	6	32	-	30	129	129	-	-	67	117	-	-	-	10,447	848	-
2d.1.2.7	HVAC Ductwork - Fuel Pool Area	-	29	1	2	25	3	-	12	72	72	-	-	296	11	-	-	-	12,762	457	-
2d.1.2.8	HVAC/Chilled Water - RCA Fuel Pool Area	-	27	0	1	19	-	-	10	57	57	-	-	223	-	-	-	-	9,072	397	-
2d.1.2.9	Instrument & Service Air-RCA-Fuel Pool	-	24	0	2	22	-	-	10	58	58	-	-	267	-	-	-	-	10,841	357	-
2d.1.2	Totals	233	760	42	55	409	405	-	482	2,386	2,386	-	-	4,894	1,479	-	-	-	296,447	15,385	-
Decontamination of Site Buildings																					
2d.1.3.1	Reactor (Post Fuel)	791	2,225	89	642	165	8,016	-	3,086	15,012	15,012	-	-	1,969	43,028	-	-	-	2,677,024	45,625	-
2d.1.3	Totals	791	2,225	89	642	165	8,016	-	3,086	15,012	15,012	-	-	1,969	43,028	-	-	-	2,677,024	45,625	-
2d.1.4	Scaffolding in support of decommissioning	-	478	6	2	24	6	-	126	642	642	-	-	257	23	-	-	-	13,086	5,641	-
2d.1	Subtotal Period 2d Activity Costs	1,581	3,511	245	815	598	10,527	-	4,536	21,813	21,813	-	-	7,120	52,182	-	-	-	3,492,399	67,557	-
Period 2d Additional Costs																					
2d.2.1	License Termination Survey Planning	-	-	-	-	-	-	1,104	331	1,435	1,435	-	-	-	-	-	-	-	-	-	12,480
2d.2.2	Remedial Action Surveys	-	-	-	-	-	-	765	229	994	994	-	-	-	-	-	-	-	-	15,661	-
2d.2	Subtotal Period 2d Additional Costs	-	-	-	-	-	-	1,868	561	2,429	2,429	-	-	-	-	-	-	-	-	15,661	12,480
Period 2d Collateral Costs																					
2d.3.1	Process decommissioning water waste	26	-	21	52	-	90	-	45	235	235	-	-	-	204	-	-	-	12,210	40	-
2d.3.2	Process decommissioning chemical flush waste	1	-	25	89	-	197	-	65	376	376	-	-	-	249	-	-	-	26,553	47	-
2d.3.3	Small tool allowance	-	74	-	-	-	-	-	11	86	86	-	-	-	-	-	-	-	-	-	-
2d.3.4	Decommissioning Equipment Disposition	-	-	137	62	556	145	-	143	1,043	1,043	-	-	6,000	529	-	-	-	304,968	88	-
2d.3.5	Spent Fuel Capital and Transfer	-	-	-	-	-	-	12,335	1,850	14,186	-	14,186	-	-	-	-	-	-	-	-	-
2d.3	Subtotal Period 2d Collateral Costs	26	74	182	203	556	432	12,335	2,115	15,925	1,739	14,186	-	6,000	982	-	-	-	343,731	174	-

Monticello Nuclear Generating Plant
Decommissioning Cost Analysis

Table C
Monticello Nuclear Generating Plant
DECON 2025 DOE Fuel Pickup Decommissioning Cost Estimate
(Thousands of 2014 Dollars)

Activity Index	Activity Description	Decon Cost	Removal Cost	Packaging Costs	Transport Costs	Off-Site Processing Costs	LLRW Disposal Costs	Other Costs	Total Contingency	Total Costs	NRC Lic. Term. Costs	Spent Fuel Management Costs	Site Restoration Costs	Processed Volume Cu. Feet	Burial Volumes				Burial / Processed Wt., Lbs.	Craft Manhours	Utility and Contractor Manhours
															Class A Cu. Feet	Class B Cu. Feet	Class C Cu. Feet	GTCC Cu. Feet			
Period 2d Period-Dependent Costs																					
2d.4.1	Decon supplies	169	-	-	-	-	-	-	42	212	212	-	-	-	-	-	-	-	-	-	-
2d.4.2	Insurance	-	-	-	-	-	-	442	44	487	487	-	-	-	-	-	-	-	-	-	-
2d.4.3	Property taxes	-	-	-	-	-	-	686	69	755	755	-	-	-	-	-	-	-	-	-	-
2d.4.4	Health physics supplies	-	714	-	-	-	-	-	178	892	892	-	-	-	-	-	-	-	-	-	-
2d.4.5	Heavy equipment rental	-	1,515	-	-	-	-	-	227	1,742	1,742	-	-	-	-	-	-	-	-	-	-
2d.4.6	Disposal of DAW generated	-	-	42	15	-	160	-	46	263	263	-	-	-	2,030	-	-	-	40,600	66	-
2d.4.7	Plant energy budget	-	-	-	-	-	-	1,064	160	1,223	1,223	-	-	-	-	-	-	-	-	-	-
2d.4.8	NRC Fees	-	-	-	-	-	-	401	40	441	441	-	-	-	-	-	-	-	-	-	-
2d.4.9	Emergency Planning Fees	-	-	-	-	-	-	1,935	194	2,129	-	2,129	-	-	-	-	-	-	-	-	-
2d.4.10	Fixed Overhead	-	-	-	-	-	-	1,400	210	1,610	1,610	-	-	-	-	-	-	-	-	-	-
2d.4.11	Liquid Radwaste Processing Equipment/Services	-	-	-	-	-	-	302	45	347	347	-	-	-	-	-	-	-	-	-	-
2d.4.12	ISFSI Operating Costs	-	-	-	-	-	-	72	11	83	-	83	-	-	-	-	-	-	-	-	-
2d.4.13	Railroad Track Maintenance	-	-	-	-	-	-	80	12	92	92	-	-	-	-	-	-	-	-	-	-
2d.4.14	Security Staff Cost	-	-	-	-	-	-	1,917	288	2,205	2,205	-	-	-	-	-	-	-	-	-	52,250
2d.4.15	DOC Staff Cost	-	-	-	-	-	-	5,802	870	6,672	6,672	-	-	-	-	-	-	-	-	-	78,571
2d.4.16	Utility Staff Cost	-	-	-	-	-	-	8,686	1,303	9,989	9,989	-	-	-	-	-	-	-	-	-	150,071
2d.4	Subtotal Period 2d Period-Dependent Costs	169	2,229	42	15	-	160	22,788	3,739	29,142	26,931	2,211	-	-	2,030	-	-	-	40,600	66	280,893
2d.0	TOTAL PERIOD 2d COST	1,777	5,814	469	1,033	1,154	11,118	36,992	10,951	69,309	52,912	16,397	-	13,120	55,194	-	-	-	3,876,730	83,458	293,373
PERIOD 2f - License Termination																					
Period 2f Direct Decommissioning Activities																					
2f.1.1	ORISE confirmatory survey	-	-	-	-	-	-	163	49	212	212	-	-	-	-	-	-	-	-	-	-
2f.1.2	Terminate license	-	-	-	-	-	-	-	-	a	-	-	-	-	-	-	-	-	-	-	-
2f.1	Subtotal Period 2f Activity Costs	-	-	-	-	-	-	163	49	212	212	-	-	-	-	-	-	-	-	-	-
Period 2f Additional Costs																					
2f.2.1	License Termination Survey	-	-	-	-	-	-	5,936	1,781	7,717	7,717	-	-	-	-	-	-	-	-	96,197	6,240
2f.2	Subtotal Period 2f Additional Costs	-	-	-	-	-	-	5,936	1,781	7,717	7,717	-	-	-	-	-	-	-	-	96,197	6,240
Period 2f Collateral Costs																					
2f.3.1	DOC staff relocation expenses	-	-	-	-	-	-	1,708	256	1,964	1,964	-	-	-	-	-	-	-	-	-	-
2f.3.2	Spent Fuel Capital and Transfer	-	-	-	-	-	-	822	123	946	-	946	-	-	-	-	-	-	-	-	-
2f.3	Subtotal Period 2f Collateral Costs	-	-	-	-	-	-	2,530	379	2,909	1,964	946	-	-	-	-	-	-	-	-	-
Period 2f Period-Dependent Costs																					
2f.4.1	Insurance	-	-	-	-	-	-	415	42	457	457	-	-	-	-	-	-	-	-	-	-
2f.4.2	Property taxes	-	-	-	-	-	-	624	62	686	686	-	-	-	-	-	-	-	-	-	-
2f.4.3	Health physics supplies	-	568	-	-	-	-	-	142	710	710	-	-	-	-	-	-	-	-	-	-
2f.4.4	Disposal of DAW generated	-	-	7	3	-	28	-	8	46	46	-	-	-	355	-	-	-	7,097	12	-
2f.4.5	Plant energy budget	-	-	-	-	-	-	532	80	612	612	-	-	-	-	-	-	-	-	-	-
2f.4.6	NRC Fees	-	-	-	-	-	-	455	46	501	501	-	-	-	-	-	-	-	-	-	-
2f.4.7	Emergency Planning Fees	-	-	-	-	-	-	241	24	265	-	265	-	-	-	-	-	-	-	-	-
2f.4.8	Fixed Overhead	-	-	-	-	-	-	1,400	210	1,610	1,610	-	-	-	-	-	-	-	-	-	-
2f.4.9	ISFSI Operating Costs	-	-	-	-	-	-	72	11	83	-	83	-	-	-	-	-	-	-	-	-
2f.4.10	Railroad Track Maintenance	-	-	-	-	-	-	80	12	92	92	-	-	-	-	-	-	-	-	-	-
2f.4.11	Security Staff Cost	-	-	-	-	-	-	1,880	282	2,162	2,162	-	-	-	-	-	-	-	-	-	51,071
2f.4.12	DOC Staff Cost	-	-	-	-	-	-	4,394	659	5,053	5,053	-	-	-	-	-	-	-	-	-	57,357
2f.4.13	Utility Staff Cost	-	-	-	-	-	-	4,918	738	5,656	5,656	-	-	-	-	-	-	-	-	-	80,929
2f.4	Subtotal Period 2f Period-Dependent Costs	-	568	7	3	-	28	15,011	2,315	17,932	17,584	348	-	-	355	-	-	-	7,097	12	189,357
2f.0	TOTAL PERIOD 2f COST	-	568	7	3	-	28	23,640	4,524	28,770	27,477	1,294	-	-	355	-	-	-	7,097	96,208	195,597
PERIOD 2 TOTALS		11,328	55,263	22,575	9,203	25,033	53,570	449,855	118,351	745,178	556,575	188,173	431	288,652	146,282	1,481	1,010	-	21,672,880	804,794	4,454,318

Monticello Nuclear Generating Plant
Decommissioning Cost Analysis

Table C
Monticello Nuclear Generating Plant
DECON 2025 DOE Fuel Pickup Decommissioning Cost Estimate
(Thousands of 2014 Dollars)

Activity Index	Activity Description	Decon Cost	Removal Cost	Packaging Costs	Transport Costs	Off-Site Processing Costs	LLRW Disposal Costs	Other Costs	Total Contingency	Total Costs	NRC Lic. Term. Costs	Spent Fuel Management Costs	Site Restoration Costs	Processed Volume Cu. Feet	Burial Volumes				Burial / Processed Wt., Lbs.	Craft Manhours	Utility and Contractor Manhours
															Class A Cu. Feet	Class B Cu. Feet	Class C Cu. Feet	GTCC Cu. Feet			
PERIOD 3b - Site Restoration																					
Period 3b Direct Decommissioning Activities																					
Demolition of Remaining Site Buildings																					
3b.1.1.1	Reactor Building	-	3,541	-	-	-	-	-	531	4,073	-	-	4,073	-	-	-	-	-	-	36,752	-
3b.1.1.2	Condensate Tanks Foundation	-	19	-	-	-	-	-	3	22	-	-	22	-	-	-	-	-	-	219	-
3b.1.1.3	Discharge Retention Basin	-	9	-	-	-	-	-	1	10	-	-	10	-	-	-	-	-	-	110	-
3b.1.1.4	HPCI Room	-	44	-	-	-	-	-	7	50	-	-	50	-	-	-	-	-	-	401	-
3b.1.1.5	Hot Shop	-	21	-	-	-	-	-	3	24	-	-	24	-	-	-	-	-	-	298	-
3b.1.1.6	Hydrogen & Oxygen Storage	-	2	-	-	-	-	-	0	2	-	-	2	-	-	-	-	-	-	21	-
3b.1.1.7	LLRW Storage & Shipping	-	140	-	-	-	-	-	21	161	-	-	161	-	-	-	-	-	-	1,794	-
3b.1.1.8	MSIV	-	4	-	-	-	-	-	1	5	-	-	5	-	-	-	-	-	-	59	-
3b.1.1.9	Offgas Stack	-	232	-	-	-	-	-	35	267	-	-	267	-	-	-	-	-	-	2,668	-
3b.1.1.10	Offgas Storage & Compressor	-	88	-	-	-	-	-	13	101	-	-	101	-	-	-	-	-	-	963	-
3b.1.1.11	Radwaste	-	482	-	-	-	-	-	72	554	-	-	554	-	-	-	-	-	-	5,196	-
3b.1.1.12	Recombiner	-	258	-	-	-	-	-	39	297	-	-	297	-	-	-	-	-	-	2,490	-
3b.1.1.13	Security Barrier	-	362	-	-	-	-	-	54	416	-	-	416	-	-	-	-	-	-	4,083	-
3b.1.1.14	Tank Farm	-	10	-	-	-	-	-	1	11	-	-	11	-	-	-	-	-	-	121	-
3b.1.1.15	Turbine	-	1,514	-	-	-	-	-	227	1,741	-	-	1,741	-	-	-	-	-	-	18,764	-
3b.1.1.16	Turbine Building Addition	-	67	-	-	-	-	-	10	77	-	-	77	-	-	-	-	-	-	971	-
3b.1.1.17	Turbine Pedestal	-	415	-	-	-	-	-	62	478	-	-	478	-	-	-	-	-	-	3,762	-
3b.1.1	Totals	-	7,207	-	-	-	-	-	1,081	8,288	-	-	8,288	-	-	-	-	-	-	78,674	-
Site Closeout Activities																					
3b.1.2	BackFill Site	-	302	-	-	-	-	-	45	347	-	-	347	-	-	-	-	-	-	542	-
3b.1.3	Grade & landscape site	-	864	-	-	-	-	-	130	994	-	-	994	-	-	-	-	-	-	1,841	-
3b.1.4	Final report to NRC	-	-	-	-	-	-	177	27	204	204	-	-	-	-	-	-	-	-	-	1,560
3b.1	Subtotal Period 3b Activity Costs	-	8,374	-	-	-	-	177	1,283	9,833	204	-	9,630	-	-	-	-	-	-	81,057	1,560
Period 3b Additional Costs																					
3b.2.1	Concrete Crushing	-	292	-	-	-	-	9	45	347	-	-	347	-	-	-	-	-	-	1,387	-
3b.2.2	Excavation of Underground Services	-	1,402	-	-	-	-	705	316	2,424	-	-	2,424	-	-	-	-	-	-	13,475	-
3b.2.3	Intake Structure cofferdam	-	285	-	-	-	-	-	43	328	-	-	328	-	-	-	-	-	-	2,540	-
3b.2	Subtotal Period 3b Additional Costs	-	1,980	-	-	-	-	715	404	3,099	-	-	3,099	-	-	-	-	-	-	17,402	-
Period 3b Collateral Costs																					
3b.3.1	Small tool allowance	-	91	-	-	-	-	-	14	105	-	-	105	-	-	-	-	-	-	-	-
3b.3.2	Spent Fuel Capital and Transfer	-	-	-	-	-	-	3,320	498	3,817	-	3,817	-	-	-	-	-	-	-	-	-
3b.3.3	Railroad Track Maintenance SR	-	-	-	-	-	-	185	28	213	-	-	213	-	-	-	-	-	-	-	-
3b.3	Subtotal Period 3b Collateral Costs	-	91	-	-	-	-	3,504	539	4,135	-	3,817	317	-	-	-	-	-	-	-	-
Period 3b Period-Dependent Costs																					
3b.4.1	Insurance	-	-	-	-	-	-	956	96	1,052	-	1,052	-	-	-	-	-	-	-	-	-
3b.4.2	Property taxes	-	-	-	-	-	-	1,159	116	1,274	(0)	1,160	115	-	-	-	-	-	-	-	-
3b.4.3	Heavy equipment rental	-	4,953	-	-	-	-	-	743	5,696	-	-	5,696	-	-	-	-	-	-	-	-
3b.4.4	Plant energy budget	-	-	-	-	-	-	612	92	704	-	-	704	-	-	-	-	-	-	-	-
3b.4.5	NRC ISFSI Fees	-	-	-	-	-	-	440	44	484	-	484	-	-	-	-	-	-	-	-	-
3b.4.6	Emergency Planning Fees	-	-	-	-	-	-	555	55	610	-	610	-	-	-	-	-	-	-	-	-
3b.4.7	ISFSI Operating Costs	-	-	-	-	-	-	166	25	190	-	190	-	-	-	-	-	-	-	-	-
3b.4.8	Fixed Overhead SR	-	-	-	-	-	-	873	131	1,004	-	-	1,004	-	-	-	-	-	-	-	-
3b.4.9	Security Staff Cost	-	-	-	-	-	-	4,327	649	4,976	0	4,229	746	-	-	-	-	-	-	-	117,557
3b.4.10	DOC Staff Cost	-	-	-	-	-	-	9,599	1,440	11,039	-	-	11,039	-	-	-	-	-	-	-	122,983
3b.4.11	Utility Staff Cost	-	-	-	-	-	-	6,284	943	7,226	0	1,518	5,709	-	-	-	-	-	-	-	98,567
3b.4	Subtotal Period 3b Period-Dependent Costs	-	4,953	-	-	-	-	24,970	4,333	34,256	0	9,243	25,013	-	-	-	-	-	-	-	339,107
3b.0	TOTAL PERIOD 3b COST	-	15,397	-	-	-	-	29,366	6,559	51,323	204	13,061	38,059	-	-	-	-	-	-	98,459	340,667
PERIOD 3c - Fuel Storage Operations/Shipping																					
Period 3c Direct Decommissioning Activities																					
Period 3c Collateral Costs																					
3c.3.1	Spent Fuel Capital and Transfer	-	-	-	-	-	-	14,609	2,191	16,800	-	16,800	-	-	-	-	-	-	-	-	-
3c.3	Subtotal Period 3c Collateral Costs	-	-	-	-	-	-	14,609	2,191	16,800	-	16,800	-	-	-	-	-	-	-	-	-

*Monticello Nuclear Generating Plant
Decommissioning Cost Analysis*

Table C
Monticello Nuclear Generating Plant
DECON 2025 DOE Fuel Pickup Decommissioning Cost Estimate
(Thousands of 2014 Dollars)

Activity Index	Activity Description	Decon Cost	Removal Cost	Packaging Costs	Transport Costs	Off-Site Processing Costs	LLRW Disposal Costs	Other Costs	Total Contingency	Total Costs	NRC Lic. Term. Costs	Spent Fuel Management Costs	Site Restoration Costs	Processed Volume Cu. Feet	Burial Volumes				Burial / Processed Wt., Lbs.	Craft Manhours	Utility and Contractor Manhours
															Class A Cu. Feet	Class B Cu. Feet	Class C Cu. Feet	GTCC Cu. Feet			
Period 3c Period-Dependent Costs																					
3c.4.1	Insurance	-	-	-	-	-	-	9,947	995	10,942	-	10,942	-	-	-	-	-	-	-	-	-
3c.4.2	Property taxes	-	-	-	-	-	-	11,630	1,163	12,793	-	12,793	-	-	-	-	-	-	-	-	-
3c.4.3	Plant energy budget	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
3c.4.4	NRC ISFSI Fees	-	-	-	-	-	-	4,577	458	5,035	-	5,035	-	-	-	-	-	-	-	-	-
3c.4.5	Emergency Planning Fees	-	-	-	-	-	-	5,774	577	6,351	-	6,351	-	-	-	-	-	-	-	-	-
3c.4.6	Fixed Overhead	-	-	-	-	-	-	9,082	1,362	10,444	-	10,444	-	-	-	-	-	-	-	-	-
3c.4.7	ISFSI Operating Costs	-	-	-	-	-	-	1,723	258	1,981	-	1,981	-	-	-	-	-	-	-	-	-
3c.4.8	Railroad Track Maintenance	-	-	-	-	-	-	2,031	305	2,336	-	2,336	-	-	-	-	-	-	-	-	-
3c.4.9	Security Staff Cost	-	-	-	-	-	-	38,431	5,765	44,196	-	44,196	-	-	-	-	-	-	-	-	1,016,126
3c.4.10	Utility Staff Cost	-	-	-	-	-	-	13,817	2,073	15,890	-	15,890	-	-	-	-	-	-	-	-	254,031
3c.4	Subtotal Period 3c Period-Dependent Costs	-	-	-	-	-	-	97,013	12,956	109,969	-	109,969	-	-	-	-	-	-	-	-	1,270,157
3c.0	TOTAL PERIOD 3c COST	-	-	-	-	-	-	111,622	15,147	126,768	-	126,768	-	-	-	-	-	-	-	-	1,270,157
PERIOD 3d - GTCC shipping																					
Period 3d Direct Decommissioning Activities																					
Nuclear Steam Supply System Removal																					
3d.1.1.1	Vessel & Internals GTCC Disposal	-	-	1,462	-	-	6,760	-	1,380	9,602	9,602	-	-	-	-	-	1,785	346,570	-	-	-
3d.1.1	Totals	-	-	1,462	-	-	6,760	-	1,380	9,602	9,602	-	-	-	-	-	1,785	346,570	-	-	-
3d.1	Subtotal Period 3d Activity Costs	-	-	1,462	-	-	6,760	-	1,380	9,602	9,602	-	-	-	-	-	1,785	346,570	-	-	-
Period 3d Collateral Costs																					
3d.3	Subtotal Period 3d Collateral Costs	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Period 3d Period-Dependent Costs																					
3d.4.1	Insurance	-	-	-	-	-	-	23	2	25	-	25	-	-	-	-	-	-	-	-	-
3d.4.2	Property taxes	-	-	-	-	-	-	26	3	29	-	29	-	-	-	-	-	-	-	-	-
3d.4.3	Plant energy budget	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
3d.4.4	NRC ISFSI Fees	-	-	-	-	-	-	15	1	16	-	16	-	-	-	-	-	-	-	-	-
3d.4.5	Emergency Planning Fees	-	-	-	-	-	-	13	1	14	-	14	-	-	-	-	-	-	-	-	-
3d.4.6	Fixed Overhead	-	-	-	-	-	-	21	3	24	-	24	-	-	-	-	-	-	-	-	-
3d.4.7	ISFSI Operating Costs	-	-	-	-	-	-	4	1	5	-	5	-	-	-	-	-	-	-	-	-
3d.4.8	Railroad Track Maintenance	-	-	-	-	-	-	4	1	5	-	5	-	-	-	-	-	-	-	-	-
3d.4.9	Security Staff Cost	-	-	-	-	-	-	88	13	101	-	101	-	-	-	-	-	-	-	-	2,314
3d.4.10	Utility Staff Cost	-	-	-	-	-	-	31	5	36	-	36	-	-	-	-	-	-	-	-	579
3d.4	Subtotal Period 3d Period-Dependent Costs	-	-	-	-	-	-	225	30	255	-	255	-	-	-	-	-	-	-	-	2,893
3d.0	TOTAL PERIOD 3d COST	-	-	1,462	-	-	6,760	225	1,410	9,857	9,602	255	-	-	-	-	1,785	346,570	-	-	2,893
PERIOD 3e - ISFSI Decontamination																					
Period 3e Direct Decommissioning Activities																					
Period 3e Additional Costs																					
3e.2.1	Decommissioning of ISFSI	-	194	3	357	-	2,726	1,784	1,266	6,330	6,330	-	-	-	15,284	-	-	-	1,652,734	10,381	1,872
3e.2	Subtotal Period 3e Additional Costs	-	194	3	357	-	2,726	1,784	1,266	6,330	6,330	-	-	-	15,284	-	-	-	1,652,734	10,381	1,872
Period 3e Collateral Costs																					
3e.3	Subtotal Period 3e Collateral Costs	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Period 3e Period-Dependent Costs																					
3e.4.1	Insurance	-	-	-	-	-	-	84	21	104	104	-	-	-	-	-	-	-	-	-	-
3e.4.2	Property taxes	-	-	-	-	-	-	203	51	253	253	-	-	-	-	-	-	-	-	-	-
3e.4.3	Plant energy budget	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
3e.4.4	Fixed Overhead	-	-	-	-	-	-	167	42	209	209	-	-	-	-	-	-	-	-	-	-
3e.4.5	Security Staff Cost	-	-	-	-	-	-	130	32	162	162	-	-	-	-	-	-	-	-	-	5,013
3e.4.6	Utility Staff Cost	-	-	-	-	-	-	213	53	266	266	-	-	-	-	-	-	-	-	-	3,803
3e.4	Subtotal Period 3e Period-Dependent Costs	-	-	-	-	-	-	796	199	994	994	-	-	-	-	-	-	-	-	-	8,816
3e.0	TOTAL PERIOD 3e COST	-	194	3	357	-	2,726	2,580	1,465	7,324	7,324	-	-	-	15,284	-	-	-	1,652,734	10,381	10,688

Monticello Nuclear Generating Plant
Decommissioning Cost Analysis

Table C
Monticello Nuclear Generating Plant
DECON 2025 DOE Fuel Pickup Decommissioning Cost Estimate
(Thousands of 2014 Dollars)

Activity Index	Activity Description	Decon Cost	Removal Cost	Packaging Costs	Transport Costs	Off-Site Processing Costs	LLRW Disposal Costs	Other Costs	Total Contingency	Total Costs	NRC Lic. Term. Costs	Spent Fuel Management Costs	Site Restoration Costs	Processed Volume Cu. Feet	Burial Volumes			GTCC Cu. Feet	Burial / Processed Wt., Lbs.	Craft Manhours	Utility and Contractor Manhours
															Class A Cu. Feet	Class B Cu. Feet	Class C Cu. Feet				
PERIOD 3f - ISFSI Site Restoration																					
Period 3f Direct Decommissioning Activities																					
Period 3f Additional Costs																					
3f.2.1	Demolition and Site Restoration of ISFSI	-	938	-	-	-	-	55	149	1,143	-	-	1,143	-	-	-	-	-	-	5,641	160
3f.2	Subtotal Period 3f Additional Costs	-	938	-	-	-	-	55	149	1,143	-	-	1,143	-	-	-	-	-	-	5,641	160
Period 3f Collateral Costs																					
3f.3.1	Small tool allowance	-	9	-	-	-	-	-	1	10	-	-	10	-	-	-	-	-	-	-	-
3f.3	Subtotal Period 3f Collateral Costs	-	9	-	-	-	-	-	1	10	-	-	10	-	-	-	-	-	-	-	-
Period 3f Period-Dependent Costs																					
3f.4.1	Insurance	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
3f.4.2	Property taxes	-	-	-	-	-	-	102	10	112	-	-	112	-	-	-	-	-	-	-	-
3f.4.3	Heavy equipment rental	-	106	-	-	-	-	-	16	121	-	-	121	-	-	-	-	-	-	-	-
3f.4.4	Plant energy budget	-	-	-	-	-	-	59	9	68	-	-	68	-	-	-	-	-	-	-	-
3f.4.5	Fixed Overhead	-	-	-	-	-	-	84	13	97	-	-	97	-	-	-	-	-	-	-	-
3f.4.6	Security Staff Cost	-	-	-	-	-	-	65	10	75	-	-	75	-	-	-	-	-	-	-	2,527
3f.4.7	Utility Staff Cost	-	-	-	-	-	-	84	13	96	-	-	96	-	-	-	-	-	-	-	1,569
3f.4	Subtotal Period 3f Period-Dependent Costs	-	106	-	-	-	-	394	70	570	-	-	570	-	-	-	-	-	-	-	4,096
3f.0	TOTAL PERIOD 3f COST	-	1,053	-	-	-	-	450	220	1,723	-	-	1,723	-	-	-	-	-	-	5,641	4,256
PERIOD 3 TOTALS		-	16,644	1,465	357	-	9,486	144,243	24,801	196,995	17,130	140,084	39,781	-	15,284	-	-	1,785	1,999,304	114,480	1,628,660
TOTAL COST TO DECOMMISSION		14,035	74,568	24,134	9,729	25,045	64,621	735,545	165,952	1,113,628	697,451	375,071	41,106	288,695	162,767	1,711	1,010	1,785	23,735,370	951,124	7,143,117

TOTAL COST TO DECOMMISSION WITH 17.51% CONTINGENCY:	\$1,113,628	thousands of 2014 dollars
TOTAL NRC LICENSE TERMINATION COST IS 62.63% OR:	\$697,451	thousands of 2014 dollars
SPENT FUEL MANAGEMENT COST IS 33.68% OR:	\$375,071	thousands of 2014 dollars
NON-NUCLEAR DEMOLITION COST IS 3.69% OR:	\$41,106	thousands of 2014 dollars
TOTAL RADWASTE VOLUME BURIED (EXCLUDING GTCC):	165,488	Cubic Feet
TOTAL GREATER THAN CLASS C RADWASTE VOLUME GENERATED:	1,785	Cubic Feet
TOTAL SCRAP METAL REMOVED:	15,499	Tons
TOTAL CRAFT LABOR REQUIREMENTS:	951,124	Man-hours

End Notes:
n/a - indicates that this activity not charged as decommissioning expense.
a - indicates that this activity performed by decommissioning staff.
0 - indicates that this value is less than 0.5 but is non-zero.
a cell containing " - " indicates a zero value

APPENDIX D

DETAILED COST ANALYSIS

SCENARIO 2

DECON DECOMMISSIONING COST ESTIMATE

WITH 60 YEARS OF SPENT FUEL STORAGE

Monticello Nuclear Generating Plant
Decommissioning Cost Analysis

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Table D
Monticello Nuclear Generating Plant
DECON 60 YR of Fuel Storage Decommissioning Cost Estimate
(Thousands of 2014 Dollars)

Activity Index	Activity Description	Decon Cost	Removal Cost	Packaging Costs	Transport Costs	Off-Site Processing Costs	LLRW Disposal Costs	Other Costs	Total Contingency	Total Costs	NRC Lic. Term. Costs	Spent Fuel Management Costs	Site Restoration Costs	Processed Volume Cu. Feet	Burial Volumes				Burial / Processed Wt., Lbs.	Craft Manhours	Utility and Contractor Manhours
															Class A Cu. Feet	Class B Cu. Feet	Class C Cu. Feet	GTCC Cu. Feet			
PERIOD 1a - Shutdown through Transition																					
Period 1a Direct Decommissioning Activities																					
1a.1.1	Prepare preliminary decommissioning cost	-	-	-	-	-	-	148	22	170	170	-	-	-	-	-	-	-	-	-	1,300
1a.1.2	Notification of Cessation of Operations									a											
1a.1.3	Remove fuel & source material									n/a											
1a.1.4	Notification of Permanent Defueling									a											
1a.1.5	Deactivate plant systems & process waste									a											
1a.1.6	Prepare and submit PSDAR	-	-	-	-	-	-	227	34	261	261	-	-	-	-	-	-	-	-	-	2,000
1a.1.7	Review plant dwgs & specs.	-	-	-	-	-	-	522	78	601	601	-	-	-	-	-	-	-	-	-	4,600
1a.1.8	Perform detailed rad survey									a											
1a.1.9	Estimate by-product inventory	-	-	-	-	-	-	114	17	131	131	-	-	-	-	-	-	-	-	-	1,000
1a.1.10	End product description	-	-	-	-	-	-	114	17	131	131	-	-	-	-	-	-	-	-	-	1,000
1a.1.11	Detailed by-product inventory	-	-	-	-	-	-	148	22	170	170	-	-	-	-	-	-	-	-	-	1,300
1a.1.12	Define major work sequence	-	-	-	-	-	-	851	128	979	979	-	-	-	-	-	-	-	-	-	7,500
1a.1.13	Perform SER and EA	-	-	-	-	-	-	352	53	405	405	-	-	-	-	-	-	-	-	-	3,100
1a.1.14	Perform Site-Specific Cost Study	-	-	-	-	-	-	568	85	653	653	-	-	-	-	-	-	-	-	-	5,000
1a.1.15	Prepare/submit License Termination Plan	-	-	-	-	-	-	465	70	535	535	-	-	-	-	-	-	-	-	-	4,096
1a.1.16	Receive NRC approval of termination plan									a											
Activity Specifications																					
1a.1.17.1	Plant & temporary facilities	-	-	-	-	-	-	559	84	642	578	-	64	-	-	-	-	-	-	-	4,920
1a.1.17.2	Plant systems	-	-	-	-	-	-	473	71	544	490	-	54	-	-	-	-	-	-	-	4,167
1a.1.17.3	NSSS Decontamination Flush	-	-	-	-	-	-	57	9	65	65	-	-	-	-	-	-	-	-	-	500
1a.1.17.4	Reactor internals	-	-	-	-	-	-	806	121	927	927	-	-	-	-	-	-	-	-	-	7,100
1a.1.17.5	Reactor vessel	-	-	-	-	-	-	738	111	849	849	-	-	-	-	-	-	-	-	-	6,500
1a.1.17.6	Sacrificial shield	-	-	-	-	-	-	57	9	65	65	-	-	-	-	-	-	-	-	-	500
1a.1.17.7	Moisture separators/reheaters	-	-	-	-	-	-	114	17	131	131	-	-	-	-	-	-	-	-	-	1,000
1a.1.17.8	Reinforced concrete	-	-	-	-	-	-	182	27	209	104	-	104	-	-	-	-	-	-	-	1,600
1a.1.17.9	Main Turbine	-	-	-	-	-	-	237	36	273	273	-	-	-	-	-	-	-	-	-	2,088
1a.1.17.10	Main Condensers	-	-	-	-	-	-	237	36	273	273	-	-	-	-	-	-	-	-	-	2,088
1a.1.17.11	Pressure suppression structure	-	-	-	-	-	-	227	34	261	261	-	-	-	-	-	-	-	-	-	2,000
1a.1.17.12	Drywell	-	-	-	-	-	-	182	27	209	209	-	-	-	-	-	-	-	-	-	1,600
1a.1.17.13	Plant structures & buildings	-	-	-	-	-	-	354	53	407	204	-	204	-	-	-	-	-	-	-	3,120
1a.1.17.14	Waste management	-	-	-	-	-	-	522	78	601	601	-	-	-	-	-	-	-	-	-	4,600
1a.1.17.15	Facility & site closeout	-	-	-	-	-	-	102	15	118	59	-	59	-	-	-	-	-	-	-	900
1a.1.17	Total	-	-	-	-	-	-	4,846	727	5,573	5,087	-	486	-	-	-	-	-	-	-	42,683
Planning & Site Preparations																					
1a.1.18	Prepare dismantling sequence	-	-	-	-	-	-	272	41	313	313	-	-	-	-	-	-	-	-	-	2,400
1a.1.19	Plant prep. & temp. svces	-	-	-	-	-	-	3,000	450	3,450	3,450	-	-	-	-	-	-	-	-	-	-
1a.1.20	Design water clean-up system	-	-	-	-	-	-	159	24	183	183	-	-	-	-	-	-	-	-	-	1,400
1a.1.21	Rigging/Cont. Cntrl Envlps/tooling/etc.	-	-	-	-	-	-	2,300	345	2,645	2,645	-	-	-	-	-	-	-	-	-	-
1a.1.22	Procure casks/liners & containers	-	-	-	-	-	-	140	21	161	161	-	-	-	-	-	-	-	-	-	1,230
1a.1	Subtotal Period 1a Activity Costs	-	-	-	-	-	-	14,224	2,134	16,358	15,873	-	486	-	-	-	-	-	-	-	78,609
Period 1a Collateral Costs																					
1a.3.1	Spent Fuel Capital and Transfer	-	-	-	-	-	-	25,293	3,794	29,087	-	29,087	-	-	-	-	-	-	-	-	-
1a.3	Subtotal Period 1a Collateral Costs	-	-	-	-	-	-	25,293	3,794	29,087	-	29,087	-	-	-	-	-	-	-	-	-
Period 1a Period-Dependent Costs																					
1a.4.1	Insurance	-	-	-	-	-	-	1,418	142	1,560	1,560	-	-	-	-	-	-	-	-	-	-
1a.4.2	Property taxes	-	-	-	-	-	-	2,718	272	2,990	2,990	-	-	-	-	-	-	-	-	-	-
1a.4.3	Health physics supplies	-	490	-	-	-	-	-	123	613	613	-	-	-	-	-	-	-	-	-	-
1a.4.4	Heavy equipment rental	-	528	-	-	-	-	-	79	608	608	-	-	-	-	-	-	-	-	-	-
1a.4.5	Disposal of DAW generated	-	-	13	4	-	48	-	14	79	79	-	-	-	610	-	-	-	12,190	20	-
1a.4.6	Plant energy budget	-	-	-	-	-	-	3,530	530	4,060	4,060	-	-	-	-	-	-	-	-	-	-
1a.4.7	NRC Fees	-	-	-	-	-	-	1,181	118	1,299	1,299	-	-	-	-	-	-	-	-	-	-
1a.4.8	Emergency Planning Fees	-	-	-	-	-	-	3,121	312	3,433	-	3,433	-	-	-	-	-	-	-	-	-
1a.4.9	Fixed Overhead	-	-	-	-	-	-	2,434	365	2,799	2,799	-	-	-	-	-	-	-	-	-	-
1a.4.10	Spent Fuel Pool O&M	-	-	-	-	-	-	791	119	910	-	910	-	-	-	-	-	-	-	-	-
1a.4.11	ISFSI Operating Costs	-	-	-	-	-	-	95	14	110	-	110	-	-	-	-	-	-	-	-	-
1a.4.12	Railroad Track Maintenance	-	-	-	-	-	-	107	16	123	123	-	-	-	-	-	-	-	-	-	-
1a.4.13	Security Staff Cost	-	-	-	-	-	-	5,349	802	6,151	6,151	-	-	-	-	-	-	-	-	-	157,471
1a.4.14	Utility Staff Cost	-	-	-	-	-	-	22,165	3,325	25,489	25,489	-	-	-	-	-	-	-	-	-	423,400
1a.4	Subtotal Period 1a Period-Dependent Costs	-	1,018	13	4	-	48	42,909	6,230	50,222	45,769	4,453	-	-	610	-	-	-	12,190	20	580,871
1a.0	TOTAL PERIOD 1a COST	-	1,018	13	4	-	48	82,426	12,158	95,667	61,642	33,540	486	-	610	-	-	-	12,190	20	659,480

Monticello Nuclear Generating Plant
Decommissioning Cost Analysis

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Table D
Monticello Nuclear Generating Plant
DECON 60 YR of Fuel Storage Decommissioning Cost Estimate
(Thousands of 2014 Dollars)

Activity Index	Activity Description	Decon Cost	Removal Cost	Packaging Costs	Transport Costs	Off-Site Processing Costs	LLRW Disposal Costs	Other Costs	Total Contingency	Total Costs	NRC Lic. Term. Costs	Spent Fuel Management Costs	Site Restoration Costs	Processed Volume Cu. Feet	Burial Volumes				Burial / Processed Wt., Lbs.	Craft Manhours	Utility and Contractor Manhours
															Class A Cu. Feet	Class B Cu. Feet	Class C Cu. Feet	GTCC Cu. Feet			
PERIOD 1b - Decommissioning Preparations																					
Period 1b Direct Decommissioning Activities																					
Detailed Work Procedures																					
1b.1.1.1	Plant systems	-	-	-	-	-	-	537	81	618	556	-	62	-	-	-	-	-	-	-	4,733
1b.1.1.2	NSSS Decontamination Flush	-	-	-	-	-	-	114	17	131	131	-	-	-	-	-	-	-	-	-	1,000
1b.1.1.3	Reactor internals	-	-	-	-	-	-	454	68	522	522	-	-	-	-	-	-	-	-	-	4,000
1b.1.1.4	Remaining buildings	-	-	-	-	-	-	153	23	176	44	-	132	-	-	-	-	-	-	-	1,350
1b.1.1.5	CRD housings & NIs	-	-	-	-	-	-	114	17	131	131	-	-	-	-	-	-	-	-	-	1,000
1b.1.1.6	Incore instrumentation	-	-	-	-	-	-	114	17	131	131	-	-	-	-	-	-	-	-	-	1,000
1b.1.1.7	Removal primary containment	-	-	-	-	-	-	227	34	261	261	-	-	-	-	-	-	-	-	-	2,000
1b.1.1.8	Reactor vessel	-	-	-	-	-	-	412	62	474	474	-	-	-	-	-	-	-	-	-	3,630
1b.1.1.9	Facility closeout	-	-	-	-	-	-	136	20	157	78	-	78	-	-	-	-	-	-	-	1,200
1b.1.1.10	Sacrificial shield	-	-	-	-	-	-	136	20	157	157	-	-	-	-	-	-	-	-	-	1,200
1b.1.1.11	Reinforced concrete	-	-	-	-	-	-	114	17	131	65	-	65	-	-	-	-	-	-	-	1,000
1b.1.1.12	Main Turbine	-	-	-	-	-	-	236	35	272	272	-	-	-	-	-	-	-	-	-	2,080
1b.1.1.13	Main Condensers	-	-	-	-	-	-	237	36	273	273	-	-	-	-	-	-	-	-	-	2,088
1b.1.1.14	Moisture separators & reheaters	-	-	-	-	-	-	227	34	261	261	-	-	-	-	-	-	-	-	-	2,000
1b.1.1.15	Radwaste building	-	-	-	-	-	-	310	46	356	321	-	36	-	-	-	-	-	-	-	2,730
1b.1.1.16	Reactor building	-	-	-	-	-	-	310	46	356	321	-	36	-	-	-	-	-	-	-	2,730
1b.1.1	Total	-	-	-	-	-	-	3,831	575	4,405	3,996	-	409	-	-	-	-	-	-	-	33,741
1b.1.2	Decon NSSS	262	-	-	-	-	-	-	131	393	393	-	-	-	-	-	-	-	-	1,067	-
1b.1	Subtotal Period 1b Activity Costs	262	-	-	-	-	-	3,831	705	4,798	4,389	-	409	-	-	-	-	-	-	1,067	33,741
Period 1b Additional Costs																					
1b.2.1	Spent fuel pool isolation	-	-	-	-	-	-	10,813	1,622	12,434	12,434	-	-	-	-	-	-	-	-	-	-
1b.2.2	Site Characterization	-	-	-	-	-	-	5,244	1,573	6,818	6,818	-	-	-	-	-	-	-	-	30,500	10,852
1b.2.3	Mixed & RCRA Waste	-	-	26	19	12	-	-	7	65	65	-	-	43	-	-	-	-	5,253	163	-
1b.2	Subtotal Period 1b Additional Costs	-	-	26	19	12	-	16,057	3,202	19,317	19,317	-	-	43	-	-	-	-	5,253	30,663	10,852
Period 1b Collateral Costs																					
1b.3.1	Decon equipment	881	-	-	-	-	-	-	132	1,013	1,013	-	-	-	-	-	-	-	-	-	-
1b.3.2	DOC staff relocation expenses	-	-	-	-	-	-	1,708	256	1,964	1,964	-	-	-	-	-	-	-	-	-	-
1b.3.3	Process decommissioning water waste	37	-	24	60	-	104	-	56	280	280	-	-	-	233	-	-	-	13,986	45	-
1b.3.4	Process decommissioning chemical flush waste	1	-	23	82	-	1,385	-	361	1,852	1,852	-	-	-	-	231	-	-	24,599	43	-
1b.3.5	Small tool allowance	-	2	-	-	-	-	-	0	2	2	-	-	-	-	-	-	-	-	-	-
1b.3.6	Pipe cutting equipment	-	1,100	-	-	-	-	-	165	1,265	1,265	-	-	-	-	-	-	-	-	-	-
1b.3.7	Decon rig	1,500	-	-	-	-	-	-	225	1,725	1,725	-	-	-	-	-	-	-	-	-	-
1b.3.8	Spent Fuel Capital and Transfer	-	-	-	-	-	-	27	4	31	-	31	-	-	-	-	-	-	-	-	-
1b.3	Subtotal Period 1b Collateral Costs	2,418	1,102	47	142	-	1,489	1,734	1,199	8,131	8,101	31	-	-	233	231	-	-	38,585	89	-
Period 1b Period-Dependent Costs																					
1b.4.1	Decon supplies	27	-	-	-	-	-	-	7	34	34	-	-	-	-	-	-	-	-	-	-
1b.4.2	Insurance	-	-	-	-	-	-	711	71	782	782	-	-	-	-	-	-	-	-	-	-
1b.4.3	Property taxes	-	-	-	-	-	-	1,339	134	1,472	1,472	-	-	-	-	-	-	-	-	-	-
1b.4.4	Health physics supplies	-	276	-	-	-	-	-	69	345	345	-	-	-	-	-	-	-	-	-	-
1b.4.5	Heavy equipment rental	-	265	-	-	-	-	-	40	305	305	-	-	-	-	-	-	-	-	-	-
1b.4.6	Disposal of DAW generated	-	-	7	3	-	28	-	8	46	46	-	-	-	358	-	-	-	7,159	12	-
1b.4.7	Plant energy budget	-	-	-	-	-	-	3,540	531	4,071	4,071	-	-	-	-	-	-	-	-	-	-
1b.4.8	NRC Fees	-	-	-	-	-	-	346	35	381	381	-	-	-	-	-	-	-	-	-	-
1b.4.9	Emergency Planning Fees	-	-	-	-	-	-	1,565	156	1,721	-	1,721	-	-	-	-	-	-	-	-	-
1b.4.10	Fixed Overhead	-	-	-	-	-	-	1,220	183	1,403	1,403	-	-	-	-	-	-	-	-	-	-
1b.4.11	Spent Fuel Pool O&M	-	-	-	-	-	-	397	59	456	-	456	-	-	-	-	-	-	-	-	-
1b.4.12	ISFSI Operating Costs	-	-	-	-	-	-	48	7	55	-	55	-	-	-	-	-	-	-	-	-
1b.4.13	Railroad Track Maintenance	-	-	-	-	-	-	53	8	62	62	-	-	-	-	-	-	-	-	-	-
1b.4.14	Security Staff Cost	-	-	-	-	-	-	2,682	402	3,084	3,084	-	-	-	-	-	-	-	-	-	78,951
1b.4.15	DOC Staff Cost	-	-	-	-	-	-	4,755	713	5,468	5,468	-	-	-	-	-	-	-	-	-	63,789
1b.4.16	Utility Staff Cost	-	-	-	-	-	-	11,170	1,675	12,845	12,845	-	-	-	-	-	-	-	-	-	213,326
1b.4	Subtotal Period 1b Period-Dependent Costs	27	541	7	3	-	28	27,824	4,099	32,530	30,297	2,232	-	-	358	-	-	-	7,159	12	356,066
1b.0	TOTAL PERIOD 1b COST	2,707	1,643	80	164	12	1,517	49,446	9,207	64,776	62,103	2,263	409	43	591	231	-	-	50,997	31,830	400,659
PERIOD 1 TOTALS		2,707	2,661	93	168	12	1,565	131,872	21,364	160,443	123,745	35,803	894	43	1,201	231	-	-	63,188	31,850	1,060,139

Table D
Monticello Nuclear Generating Plant
DECON 60 YR of Fuel Storage Decommissioning Cost Estimate
(Thousands of 2014 Dollars)

Activity Index	Activity Description	Decon Cost	Removal Cost	Packaging Costs	Transport Costs	Off-Site Processing Costs	LLRW Disposal Costs	Other Costs	Total Contingency	Total Costs	NRC Lic. Term. Costs	Spent Fuel Management Costs	Site Restoration Costs	Processed Volume Cu. Feet	Burial Volumes				Burial / Processed Wt., Lbs.	Craft Manhours	Utility and Contractor Manhours
															Class A Cu. Feet	Class B Cu. Feet	Class C Cu. Feet	GTCC Cu. Feet			
PERIOD 2a - Large Component Removal																					
Period 2a Direct Decommissioning Activities																					
Nuclear Steam Supply System Removal																					
2a.1.1.1	Recirculation System Piping & Valves	92	78	17	22	-	407	-	172	789	789	-	-	-	858	-	-	-	98,047	2,888	-
2a.1.1.2	Recirculation Pumps & Motors	33	52	15	37	21	423	-	146	727	727	-	-	96	945	-	-	-	112,200	1,563	-
2a.1.1.3	CRDMs & NIs Removal	162	857	400	98	-	887	-	572	2,976	2,976	-	-	-	3,741	-	-	-	213,700	17,768	-
2a.1.1.4	Reactor Vessel Internals	193	3,392	15,478	2,739	-	19,466	309	16,974	58,552	58,552	-	-	-	1,252	1,481	1,010	-	312,338	27,675	1,239
2a.1.1.5	Reactor Vessel	94	7,234	2,229	976	-	3,459	309	8,050	22,352	22,352	-	-	-	10,736	-	-	-	1,089,965	27,675	1,239
2a.1.1	Totals	574	11,614	18,139	3,873	21	24,642	619	25,914	85,396	85,396	-	-	96	17,532	1,481	1,010	-	1,826,250	77,569	2,478
Removal of Major Equipment																					
2a.1.2	Main Turbine/Generator	-	326	1,455	390	3,137	352	-	844	6,504	6,504	-	-	25,377	1,413	-	-	-	1,616,032	5,557	-
2a.1.3	Main Condensers	-	1,109	379	140	1,613	199	-	628	4,067	4,067	-	-	17,396	727	-	-	-	830,822	18,831	-
Cascading Costs from Clean Building Demolition																					
2a.1.4.1	Reactor Building	-	611	-	-	-	-	-	92	703	703	-	-	-	-	-	-	-	-	6,238	-
2a.1.4.2	Radwaste	-	53	-	-	-	-	-	8	61	61	-	-	-	-	-	-	-	-	569	-
2a.1.4.3	Turbine	-	157	-	-	-	-	-	24	180	180	-	-	-	-	-	-	-	-	1,884	-
2a.1.4	Totals	-	821	-	-	-	-	-	123	944	944	-	-	-	-	-	-	-	-	8,691	-
Disposal of Plant Systems																					
2a.1.5.1	Automatic Press Relief	-	98	6	8	67	57	-	51	287	287	-	-	803	206	-	-	-	46,236	1,656	-
2a.1.5.2	Chemistry Sampling	-	23	1	2	13	10	-	11	59	59	-	-	156	37	-	-	-	8,774	400	-
2a.1.5.3	Chemistry Sampling - Insulated	-	1	0	0	-	0	-	0	2	2	-	-	-	1	-	-	-	73	28	-
2a.1.5.4	Circulating Water - RCA	-	172	10	44	557	-	-	134	917	917	-	-	6,656	-	-	-	-	270,307	2,860	-
2a.1.5.5	Combustible Gas Control - Insul - RCA	-	24	0	1	18	-	-	9	53	53	-	-	212	-	-	-	-	8,617	378	-
2a.1.5.6	Combustible Gas Control - RCA	-	15	0	2	24	-	-	8	49	49	-	-	285	-	-	-	-	11,577	245	-
2a.1.5.7	Condensate & Feedwater	-	818	178	244	1,669	2,008	-	1,011	5,929	5,929	-	-	19,947	7,319	-	-	-	1,293,969	14,196	-
2a.1.5.8	Condensate & Feedwater - Insulated	-	408	33	46	349	331	-	247	1,414	1,414	-	-	4,176	1,207	-	-	-	249,413	6,964	-
2a.1.5.9	Condensate Demin	-	451	28	37	280	274	-	232	1,303	1,303	-	-	3,346	1,000	-	-	-	201,994	7,618	-
2a.1.5.10	Condensate Storage	-	604	29	60	597	216	-	306	1,811	1,811	-	-	7,131	795	-	-	-	341,719	10,345	-
2a.1.5.11	Control Rod Drive	-	2	0	0	2	1	-	1	7	7	-	-	19	4	-	-	-	1,015	41	-
2a.1.5.12	Control Rod Drive Hydraulic	-	344	15	20	139	154	-	150	822	822	-	-	1,658	562	-	-	-	104,537	5,898	-
2a.1.5.13	Core Spray	-	66	18	37	367	143	-	115	745	745	-	-	4,384	521	-	-	-	212,510	1,163	-
2a.1.5.14	Core Spray - Insulated	-	120	7	9	68	72	-	60	338	338	-	-	818	264	-	-	-	50,680	2,033	-
2a.1.5.15	Demin Water - Insulated - RCA	-	12	0	1	7	-	-	4	24	24	-	-	85	-	-	-	-	3,445	181	-
2a.1.5.16	Demin Water - RCA	-	34	0	2	21	-	-	12	69	69	-	-	253	-	-	-	-	10,278	508	-
2a.1.5.17	Diesel Oil - RCA	-	2	0	0	2	-	-	1	4	4	-	-	23	-	-	-	-	931	25	-
2a.1.5.18	Drywell Atmosphere Cooling - RCA	-	31	1	4	46	-	-	15	97	97	-	-	548	-	-	-	-	22,244	550	-
2a.1.5.19	EDG Emerg Service Water - Insul - RCA	-	0	0	0	0	-	-	0	1	1	-	-	2	-	-	-	-	84	4	-
2a.1.5.20	Electrical - Clean	-	11	-	-	-	-	-	2	12	-	-	12	-	-	-	-	-	-	182	-
2a.1.5.21	Emergency Service Water - Insul - RCA	-	18	0	1	11	-	-	6	37	37	-	-	137	-	-	-	-	5,544	281	-
2a.1.5.22	Emergency Service Water - RCA	-	1	0	0	1	-	-	1	3	3	-	-	13	-	-	-	-	512	22	-
2a.1.5.23	GEZIP - RCA	-	3	0	1	9	-	-	2	14	14	-	-	103	-	-	-	-	4,184	48	-
2a.1.5.24	Generator Physical Design - RCA	-	4	0	0	3	-	-	1	8	8	-	-	31	-	-	-	-	1,250	67	-
2a.1.5.25	H2-O2 Control Analyzing	-	5	0	0	0	4	-	2	12	12	-	-	6	13	-	-	-	1,089	81	-
2a.1.5.26	H2-O2 Control Analyzing - Insulated	-	5	0	0	0	4	-	2	12	12	-	-	6	13	-	-	-	1,089	81	-
2a.1.5.27	High Pressure Coolant Injection	-	56	6	10	81	57	-	42	252	252	-	-	972	209	-	-	-	53,266	966	-
2a.1.5.28	High Pressure Coolant Injection - Insula	-	182	13	18	134	132	-	103	582	582	-	-	1,598	481	-	-	-	96,733	3,079	-
2a.1.5.29	Hydrogen Cooling	-	7	-	-	-	-	-	1	8	-	-	8	-	-	-	-	-	-	118	-
2a.1.5.30	Hydrogen Cooling - RCA	-	6	0	0	3	-	-	2	11	11	-	-	39	-	-	-	-	1,600	79	-
2a.1.5.31	Hydrogen Seal Oil - RCA	-	14	0	1	16	-	-	6	38	38	-	-	189	-	-	-	-	7,669	212	-
2a.1.5.32	Hydrogen Water Chemistry - RCA	-	20	0	1	12	-	-	7	40	40	-	-	140	-	-	-	-	5,672	304	-
2a.1.5.33	Instrument & Service Air - RCA	-	185	3	12	148	-	-	71	418	418	-	-	1,768	-	-	-	-	71,810	2,733	-
2a.1.5.34	Main Condenser	-	162	11	15	112	113	-	89	502	502	-	-	1,333	411	-	-	-	81,311	2,746	-
2a.1.5.35	Main Steam	-	206	16	23	180	163	-	124	712	712	-	-	2,148	594	-	-	-	126,485	3,512	-
2a.1.5.36	Main Turbine	-	839	203	263	1,653	2,383	-	1,113	6,454	6,454	-	-	19,760	8,687	-	-	-	1,376,578	14,733	-
2a.1.5.37	Main Turbine - Insulated	-	178	17	27	212	183	-	128	745	745	-	-	2,530	667	-	-	-	146,839	3,069	-
2a.1.5.38	Miscellaneous	-	35	0	2	25	-	-	13	76	76	-	-	302	-	-	-	-	12,283	622	-
2a.1.5.39	Off Gas Recombiner	-	157	18	24	150	210	-	120	678	678	-	-	1,795	764	-	-	-	123,437	2,708	-
2a.1.5.40	Off Gas Recombiner - Insulated	-	320	18	20	114	195	-	151	818	818	-	-	1,366	709	-	-	-	102,395	5,385	-
2a.1.5.41	Post Accident Sampling	-	21	1	1	4	9	-	8	44	44	-	-	53	33	-	-	-	4,355	345	-
2a.1.5.42	Post Accident Sampling - Insulated	-	14	1	1	1	10	-	6	34	34	-	-	17	37	-	-	-	3,143	212	-
2a.1.5.43	RHR Service Water - Insulated - RCA	-	69	2	10	124	-	-	37	242	242	-	-	1,485	-	-	-	-	60,293	1,125	-
2a.1.5.44	RHR Service Water - RCA	-	3	0	0	3	-	-	1	8	8	-	-	35	-	-	-	-	1,410	57	-
2a.1.5.45	Reactor Feedwater Pump Seal	-	46	2	3	16	26	-	21	115	115	-	-	193	96	-	-	-	14,222	773	-
2a.1.5.46	Residual Heat Removal	320	209	162	134	536	1,653	-	742	3,755	3,755	-	-	6,406	6,012	-	-	-	658,423	4,135	-

Monticello Nuclear Generating Plant
Decommissioning Cost Analysis

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Table D
Monticello Nuclear Generating Plant
DECON 60 YR of Fuel Storage Decommissioning Cost Estimate
(Thousands of 2014 Dollars)

Activity Index	Activity Description	Decon Cost	Removal Cost	Packaging Costs	Transport Costs	Off-Site Processing Costs	LLRW Disposal Costs	Other Costs	Total Contingency	Total Costs	NRC Lic. Term. Costs	Spent Fuel Management Costs	Site Restoration Costs	Processed Volume Cu. Feet	Burial Volumes				Burial / Processed Wt., Lbs.	Craft Manhours	Utility and Contractor Manhours
															Class A Cu. Feet	Class B Cu. Feet	Class C Cu. Feet	GTCC Cu. Feet			
Disposal of Plant Systems (continued)																					
2a.1.5.47	Residual Heat Removal - Insulated	542	461	61	62	282	716	-	623	2,746	2,746	-	-	3,367	2,607	-	-	-	309,163	10,340	-
2a.1.5.48	Rx Core Isolation Cooling	-	40	2	3	22	21	-	19	107	107	-	-	259	76	-	-	-	15,537	691	-
2a.1.5.49	Rx Core Isolation Cooling - Insulated	-	89	5	5	24	54	-	41	218	218	-	-	288	198	-	-	-	24,804	1,479	-
2a.1.5.50	Rx Recirculation	47	48	5	3	4	52	-	50	210	210	-	-	43	190	-	-	-	14,353	1,580	-
2a.1.5.51	Snubbers	-	141	2	4	32	25	-	47	251	251	-	-	377	90	-	-	-	21,240	2,548	-
2a.1.5.52	Standby Liquid Control - Insul - RCA	-	3	0	0	2	-	-	1	6	6	-	-	22	-	-	-	-	904	48	-
2a.1.5.53	Standby Liquid Control - RCA	-	22	0	2	21	-	-	9	53	53	-	-	245	-	-	-	-	9,969	341	-
2a.1.5.54	Stator Cooling - RCA	-	6	0	1	11	-	-	3	21	21	-	-	126	-	-	-	-	5,135	98	-
2a.1.5.55	Traversing Incore Probe	0	3	0	0	0	2	-	1	6	6	-	-	1	5	-	-	-	390	51	-
2a.1.5	Totals	909	6,814	882	1,164	8,170	9,278	-	5,964	33,181	33,161	-	20	97,654	33,808	-	-	-	6,201,492	119,943	-
2a.1.6	Scaffolding in support of decommissioning	-	1,911	24	9	95	25	-	502	2,566	2,566	-	-	1,030	91	-	-	-	52,344	22,564	-
2a.1	Subtotal Period 2a Activity Costs	1,483	22,596	20,878	5,575	13,035	34,496	619	33,975	132,658	132,638	-	20	141,552	53,571	1,481	1,010	-	10,526,940	253,155	2,478
Period 2a Additional Costs																					
2a.2.1	Remedial Action Surveys	-	-	-	-	-	-	1,343	403	1,746	1,746	-	-	-	-	-	-	-	-	27,506	-
2a.2	Subtotal Period 2a Additional Costs	-	-	-	-	-	-	1,343	403	1,746	1,746	-	-	-	-	-	-	-	-	27,506	-
Period 2a Collateral Costs																					
2a.3.1	Process decommissioning water waste	84	-	55	139	-	239	-	128	645	645	-	-	-	538	-	-	-	32,290	105	-
2a.3.2	Process decommissioning chemical flush waste	5	-	206	746	-	1,652	-	548	3,157	3,157	-	-	-	2,093	-	-	-	223,008	392	-
2a.3.3	Small tool allowance	-	270	-	-	-	-	-	41	311	280	-	31	-	-	-	-	-	-	-	-
2a.3.4	Spent Fuel Capital and Transfer	-	-	-	-	-	-	71	11	81	-	81	-	-	-	-	-	-	-	-	-
2a.3.5	On-site survey and release of 0.0 tons clean metallic waste	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2a.3	Subtotal Period 2a Collateral Costs	89	270	261	884	-	1,892	71	727	4,194	4,082	81	31	-	2,631	-	-	-	255,298	497	-
Period 2a Period-Dependent Costs																					
2a.4.1	Decon supplies	71	-	-	-	-	-	-	18	89	89	-	-	-	-	-	-	-	-	-	-
2a.4.2	Insurance	-	-	-	-	-	-	777	78	854	854	-	-	-	-	-	-	-	-	-	-
2a.4.3	Property taxes	-	-	-	-	-	-	3,365	336	3,701	3,331	-	370	-	-	-	-	-	-	-	-
2a.4.4	Health physics supplies	-	1,940	-	-	-	-	-	485	2,425	2,425	-	-	-	-	-	-	-	-	-	-
2a.4.5	Heavy equipment rental	-	2,687	-	-	-	-	-	403	3,090	3,090	-	-	-	-	-	-	-	-	-	-
2a.4.6	Disposal of DAW generated	-	-	112	39	-	424	-	123	699	699	-	-	-	5,394	-	-	-	107,886	176	-
2a.4.7	Plant energy budget	-	-	-	-	-	-	4,438	666	5,103	5,103	-	-	-	-	-	-	-	-	-	-
2a.4.8	NRC Fees	-	-	-	-	-	-	829	83	911	911	-	-	-	-	-	-	-	-	-	-
2a.4.9	Emergency Planning Fees	-	-	-	-	-	-	3,399	340	3,739	-	3,739	-	-	-	-	-	-	-	-	-
2a.4.10	Fixed Overhead	-	-	-	-	-	-	2,459	369	2,827	2,827	-	-	-	-	-	-	-	-	-	-
2a.4.11	Spent Fuel Pool O&M	-	-	-	-	-	-	1,047	157	1,204	-	1,204	-	-	-	-	-	-	-	-	-
2a.4.12	ISFSI Operating Costs	-	-	-	-	-	-	126	19	145	-	145	-	-	-	-	-	-	-	-	-
2a.4.13	Railroad Track Maintenance	-	-	-	-	-	-	141	21	162	162	-	-	-	-	-	-	-	-	-	-
2a.4.14	Security Staff Cost	-	-	-	-	-	-	6,002	900	6,902	6,902	-	-	-	-	-	-	-	-	-	174,570
2a.4.15	DOC Staff Cost	-	-	-	-	-	-	15,225	2,284	17,509	17,509	-	-	-	-	-	-	-	-	-	209,760
2a.4.16	Utility Staff Cost	-	-	-	-	-	-	21,262	3,189	24,451	24,451	-	-	-	-	-	-	-	-	-	390,540
2a.4	Subtotal Period 2a Period-Dependent Costs	71	4,627	112	39	-	424	59,068	9,471	73,813	68,355	5,088	370	-	5,394	-	-	-	107,886	176	774,870
2a.0	TOTAL PERIOD 2a COST	1,643	27,494	21,252	6,499	13,035	36,812	61,101	44,576	212,411	206,821	5,169	421	141,552	61,596	1,481	1,010	-	10,890,130	281,333	777,348

PERIOD 2b - Site Decontamination

Period 2b Direct Decommissioning Activities

Disposal of Plant Systems																					
2b.1.1.1	ALARA/Radiological	-	15	0	0	3	3	-	5	27	27	-	-	35	10	-	-	-	2,083	277	-
2b.1.1.2	Alternate N2 - RCA	-	13	0	1	8	-	-	5	27	27	-	-	93	-	-	-	-	3,765	185	-
2b.1.1.3	Decontamination Projects	-	1	0	0	0	0	-	0	2	2	-	-	2	0	-	-	-	130	17	-
2b.1.1.4	Electrical - Contaminated	-	366	5	17	200	25	-	131	744	744	-	-	2,389	90	-	-	-	102,957	6,325	-
2b.1.1.5	Electrical - Decontaminated	-	2,195	36	156	1,953	-	-	869	5,208	5,208	-	-	23,344	-	-	-	-	948,013	37,107	-
2b.1.1.6	Fire - RCA	-	84	1	4	51	-	-	29	169	169	-	-	614	-	-	-	-	24,917	1,324	-
2b.1.1.7	HVAC Ductwork	-	263	6	19	223	28	-	110	649	649	-	-	2,665	100	-	-	-	114,856	4,111	-
2b.1.1.8	HVAC/Chilled Water - RCA	-	267	4	18	230	-	-	104	624	624	-	-	2,752	-	-	-	-	111,779	3,985	-
2b.1.1.9	Heating & Ventilation	-	401	14	44	503	62	-	199	1,224	1,224	-	-	6,018	227	-	-	-	259,372	7,101	-
2b.1.1.10	Heating Boiler - Insulated - RCA	-	2	0	0	2	-	-	1	5	5	-	-	26	-	-	-	-	1,058	35	-
2b.1.1.11	Liquid Radwaste	494	571	44	46	257	468	-	557	2,437	2,437	-	-	3,073	1,728	-	-	-	237,560	17,194	-
2b.1.1.12	Makeup Demin - RCA	-	86	2	10	123	-	-	42	263	263	-	-	1,471	-	-	-	-	59,747	1,412	-
2b.1.1.13	Non-Essential Diesel Generator - RCA	-	23	2	9	119	-	-	25	179	179	-	-	1,424	-	-	-	-	57,832	395	-
2b.1.1.14	Off Gas Holdup	-	283	19	28	230	172	-	155	888	888	-	-	2,755	630	-	-	-	153,412	4,769	-
2b.1.1.15	Primary Containment	-	378	40	64	519	413	-	289	1,703	1,703	-	-	6,201	1,506	-	-	-	351,391	6,454	-

Table D
Monticello Nuclear Generating Plant
DECON 60 YR of Fuel Storage Decommissioning Cost Estimate
(Thousands of 2014 Dollars)

Activity Index	Activity Description	Decon Cost	Removal Cost	Packaging Costs	Transport Costs	Off-Site Processing Costs	LLRW Disposal Costs	Other Costs	Total Contingency	Total Costs	NRC Lic. Term. Costs	Spent Fuel Management Costs	Site Restoration Costs	Processed Volume Cu. Feet	Burial Volumes				Burial / Processed Wt., Lbs.	Craft Manhours	Utility and Contractor Manhours
															Class A Cu. Feet	Class B Cu. Feet	Class C Cu. Feet	GTCC Cu. Feet			
Disposal of Plant Systems (continued)																					
2b.1.1.16	Process Radiation Monitors	-	38	2	2	12	14	-	15	83	83	-	-	142	52	-	-	-	9,195	649	-
2b.1.1.17	Rx Bldg Closed Clng Water - Insul - RCA	-	93	2	7	82	-	-	37	220	220	-	-	977	-	-	-	-	39,675	1,484	-
2b.1.1.18	Rx Bldg Closed Clng Water - RCA	-	152	11	47	593	-	-	135	938	938	-	-	7,093	-	-	-	-	288,031	2,489	-
2b.1.1.19	Rx Component Handling Equip	23	117	18	20	97	228	-	117	621	621	-	-	1,158	829	-	-	-	101,862	2,462	-
2b.1.1.20	Rx Pressure Vessel	23	39	5	4	6	63	-	39	181	181	-	-	75	230	-	-	-	18,281	1,051	-
2b.1.1.21	Rx Water Cleanup	145	220	18	12	11	202	-	184	793	793	-	-	130	737	-	-	-	54,051	5,736	-
2b.1.1.22	Secondary Containment	-	103	7	11	85	70	-	58	334	334	-	-	1,017	255	-	-	-	58,151	1,763	-
2b.1.1.23	Service & Seal Water - Insulated - RCA	-	99	2	8	99	-	-	41	249	249	-	-	1,180	-	-	-	-	47,917	1,565	-
2b.1.1.24	Service & Seal Water - RCA	-	131	3	12	151	-	-	58	355	355	-	-	1,809	-	-	-	-	73,453	2,016	-
2b.1.1.25	Service Air Blower - RCA	-	13	0	1	17	-	-	6	38	38	-	-	206	-	-	-	-	8,364	206	-
2b.1.1.26	Solid Radwaste	285	409	34	37	200	375	-	378	1,718	1,718	-	-	2,387	1,380	-	-	-	187,377	10,820	-
2b.1.1.27	Structures & Buildings	-	64	2	4	30	23	-	27	151	151	-	-	357	85	-	-	-	20,152	1,128	-
2b.1.1.28	Wells & Domestic Water	-	8	-	-	-	-	-	1	9	-	-	9	-	-	-	-	-	-	144	-
2b.1.1.29	Wells & Domestic Water - RCA	-	43	1	2	29	-	-	15	90	90	-	-	342	-	-	-	-	13,874	633	-
2b.1.1	Totals	971	6,479	280	584	5,834	2,147	-	3,632	19,926	19,917	-	9	69,735	7,859	-	-	-	3,349,255	122,835	-
2b.1.2	Scaffolding in support of decommissioning	-	2,389	29	11	119	31	-	628	3,208	3,208	-	-	1,287	114	-	-	-	65,430	28,205	-
Decontamination of Site Buildings																					
2b.1.3.1	Reactor Building	4,343	2,430	138	368	4,022	978	-	3,696	15,975	15,975	-	-	48,077	4,667	-	-	-	2,318,995	112,507	-
2b.1.3.2	Admin	91	5	0	2	-	13	-	50	161	161	-	-	-	79	-	-	-	6,840	1,599	-
2b.1.3.3	HPCI Room	24	24	0	2	10	12	-	23	96	96	-	-	118	70	-	-	-	10,760	789	-
2b.1.3.4	Hot Shop	14	4	0	1	-	9	-	11	39	39	-	-	-	56	-	-	-	4,860	286	-
2b.1.3.5	LLRW Storage & Shipping	49	21	1	5	3	39	-	41	159	159	-	-	31	237	-	-	-	21,708	1,126	-
2b.1.3.6	Offgas Stack	315	228	5	16	112	70	-	252	998	998	-	-	1,343	388	-	-	-	87,082	8,859	-
2b.1.3.7	Offgas Storage & Compressor	35	15	0	4	2	29	-	29	114	114	-	-	25	173	-	-	-	15,948	785	-
2b.1.3.8	Radwaste	103	53	2	12	14	83	-	90	357	357	-	-	172	501	-	-	-	49,943	2,501	-
2b.1.3.9	Radwaste Material Storage Warehouse	54	21	1	6	-	45	-	45	171	171	-	-	-	270	-	-	-	23,400	1,196	-
2b.1.3.10	Recombiner	23	21	1	4	17	21	-	25	111	111	-	-	199	121	-	-	-	18,405	695	-
2b.1.3.11	Turbine	601	304	10	72	107	489	-	526	2,109	2,109	-	-	1,283	2,912	-	-	-	303,150	14,432	-
2b.1.3.12	Turbine Building Addition	50	18	1	5	-	39	-	40	153	153	-	-	-	236	-	-	-	20,478	1,086	-
2b.1.3	Totals	5,701	3,143	159	498	4,287	1,828	-	4,827	20,443	20,443	-	-	51,247	9,710	-	-	-	2,881,569	145,859	-
2b.1	Subtotal Period 2b Activity Costs	6,673	12,012	467	1,093	10,240	4,006	-	9,087	43,578	43,568	-	9	122,269	17,682	-	-	-	6,296,255	296,899	-
Period 2b Additional Costs																					
2b.2.1	Remedial Action Surveys	-	-	-	-	-	-	2,259	678	2,936	2,936	-	-	-	-	-	-	-	-	46,242	-
2b.2.2	Operational Equipment	-	-	17	66	603	-	-	102	788	788	-	-	11,710	-	-	-	-	292,750	32	-
2b.2	Subtotal Period 2b Additional Costs	-	-	17	66	603	-	2,259	780	3,724	3,724	-	-	11,710	-	-	-	-	292,750	46,274	-
Period 2b Collateral Costs																					
2b.3.1	Process decommissioning water waste	172	-	115	291	-	501	-	266	1,345	1,345	-	-	-	1,127	-	-	-	67,647	220	-
2b.3.2	Process decommissioning chemical flush waste	1	-	41	147	-	326	-	108	623	623	-	-	-	413	-	-	-	43,978	77	-
2b.3.3	Small tool allowance	-	286	-	-	-	-	-	43	329	329	-	-	-	-	-	-	-	-	-	-
2b.3.4	Spent Fuel Capital and Transfer	-	-	-	-	-	-	29,013	4,352	33,365	-	33,365	-	-	-	-	-	-	-	-	-
2b.3.5	On-site survey and release of 0.0 tons clean metallic waste	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2b.3	Subtotal Period 2b Collateral Costs	173	286	156	438	-	827	29,013	4,769	35,662	2,297	33,365	-	-	1,540	-	-	-	111,625	297	-
Period 2b Period-Dependent Costs																					
2b.4.1	Decon supplies	1,063	-	-	-	-	-	-	266	1,328	1,328	-	-	-	-	-	-	-	-	-	-
2b.4.2	Insurance	-	-	-	-	-	-	1,306	131	1,437	1,437	-	-	-	-	-	-	-	-	-	-
2b.4.3	Property taxes	-	-	-	-	-	-	5,191	519	5,710	5,710	-	-	-	-	-	-	-	-	-	-
2b.4.4	Health physics supplies	-	2,659	-	-	-	-	-	665	3,324	3,324	-	-	-	-	-	-	-	-	-	-
2b.4.5	Heavy equipment rental	-	4,472	-	-	-	-	-	671	5,143	5,143	-	-	-	-	-	-	-	-	-	-
2b.4.6	Disposal of DAW generated	-	-	121	42	-	456	-	132	752	752	-	-	-	5,805	-	-	-	116,095	189	-
2b.4.7	Plant energy budget	-	-	-	-	-	-	5,890	883	6,773	6,773	-	-	-	-	-	-	-	-	-	-
2b.4.8	NRC Fees	-	-	-	-	-	-	1,393	139	1,532	1,532	-	-	-	-	-	-	-	-	-	-
2b.4.9	Emergency Planning Fees	-	-	-	-	-	-	5,714	571	6,285	-	6,285	-	-	-	-	-	-	-	-	-
2b.4.10	Fixed Overhead	-	-	-	-	-	-	4,133	620	4,753	4,753	-	-	-	-	-	-	-	-	-	-
2b.4.11	Spent Fuel Pool O&M	-	-	-	-	-	-	1,760	264	2,024	-	2,024	-	-	-	-	-	-	-	-	-
2b.4.12	Liquid Radwaste Processing Equipment/Services	-	-	-	-	-	-	446	67	513	513	-	-	-	-	-	-	-	-	-	-
2b.4.13	ISFSI Operating Costs	-	-	-	-	-	-	212	32	244	-	244	-	-	-	-	-	-	-	-	-
2b.4.14	Railroad Track Maintenance	-	-	-	-	-	-	237	36	273	273	-	-	-	-	-	-	-	-	-	-
2b.4.15	Security Staff Cost	-	-	-	-	-	-	10,090	1,514	11,604	11,604	-	-	-	-	-	-	-	-	-	293,480
2b.4.16	DOC Staff Cost	-	-	-	-	-	-	24,752	3,713	28,465	28,465	-	-	-	-	-	-	-	-	-	338,720
2b.4.17	Utility Staff Cost	-	-	-	-	-	-	34,504	5,176	39,680	39,680	-	-	-	-	-	-	-	-	-	628,720
2b.4	Subtotal Period 2b Period-Dependent Costs	1,063	7,131	121	42	-	456	95,629	15,398	119,840	111,287	8,553	-	-	5,805	-	-	-	116,095	189	1,260,920
2b.0	TOTAL PERIOD 2b COST	7,908	19,430	762	1,639	10,843	5,289	126,900	30,033	202,804	160,877	41,918	9	133,979	25,027	-	-	-	6,816,725	343,660	1,260,920

Monticello Nuclear Generating Plant
Decommissioning Cost Analysis

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Table D
Monticello Nuclear Generating Plant
DECON 60 YR of Fuel Storage Decommissioning Cost Estimate
(Thousands of 2014 Dollars)

Activity Index	Activity Description	Decon Cost	Removal Cost	Packaging Costs	Transport Costs	Off-Site Processing Costs	LLRW Disposal Costs	Other Costs	Total Contingency	Total Costs	NRC Lic. Term. Costs	Spent Fuel Management Costs	Site Restoration Costs	Processed Volume Cu. Feet	Burial Volumes				Burial / Processed Wt., Lbs.	Craft Manhours	Utility and Contractor Manhours
															Class A Cu. Feet	Class B Cu. Feet	Class C Cu. Feet	GTCC Cu. Feet			
PERIOD 2c - Spent fuel delay prior to SFP decon																					
Period 2c Direct Decommissioning Activities																					
Period 2c Collateral Costs																					
2c.3.1	Spent Fuel Capital and Transfer	-	-	-	-	-	-	33,471	5,021	38,492	-	38,492	-	-	-	-	-	-	-	-	-
2c.3	Subtotal Period 2c Collateral Costs	-	-	-	-	-	-	33,471	5,021	38,492	-	38,492	-	-	-	-	-	-	-	-	-
Period 2c Period-Dependent Costs																					
2c.4.1	Insurance	-	-	-	-	-	-	5,848	585	6,432	6,432	-	-	-	-	-	-	-	-	-	-
2c.4.2	Property taxes	-	-	-	-	-	-	15,696	1,570	17,265	17,265	-	-	-	-	-	-	-	-	-	-
2c.4.3	Health physics supplies	-	1,958	-	-	-	-	-	490	2,448	2,448	-	-	-	-	-	-	-	-	-	-
2c.4.4	Disposal of DAW generated	-	-	86	30	-	323	-	94	532	532	-	-	-	4,110	-	-	-	82,199	134	-
2c.4.5	Plant energy budget	-	-	-	-	-	-	7,033	1,055	8,088	8,088	-	-	-	-	-	-	-	-	-	-
2c.4.6	NRC Fees	-	-	-	-	-	-	2,883	288	3,171	3,171	-	-	-	-	-	-	-	-	-	-
2c.4.7	Emergency Planning Fees	-	-	-	-	-	-	25,586	2,559	28,145	-	28,145	-	-	-	-	-	-	-	-	-
2c.4.8	Fixed Overhead	-	-	-	-	-	-	18,508	2,776	21,285	21,285	-	-	-	-	-	-	-	-	-	-
2c.4.9	Spent Fuel Pool O&M	-	-	-	-	-	-	7,880	1,182	9,062	-	9,062	-	-	-	-	-	-	-	-	-
2c.4.10	Liquid Radwaste Processing Equipment/Services	-	-	-	-	-	-	399	60	459	459	-	-	-	-	-	-	-	-	-	-
2c.4.11	ISFSI Operating Costs	-	-	-	-	-	-	951	143	1,094	-	1,094	-	-	-	-	-	-	-	-	-
2c.4.12	Railroad Track Maintenance	-	-	-	-	-	-	1,063	159	1,222	1,222	-	-	-	-	-	-	-	-	-	-
2c.4.13	Security Staff Cost	-	-	-	-	-	-	38,571	5,786	44,356	22,178	22,178	-	-	-	-	-	-	-	-	1,106,383
2c.4.14	Utility Staff Cost	-	-	-	-	-	-	44,188	6,628	50,817	25,408	25,408	-	-	-	-	-	-	-	-	820,697
2c.4	Subtotal Period 2c Period-Dependent Costs	-	1,958	86	30	-	323	168,606	23,374	194,376	108,489	85,887	-	-	4,110	-	-	-	82,199	134	1,927,080
2c.0	TOTAL PERIOD 2c COST	-	1,958	86	30	-	323	202,077	28,394	232,868	108,489	124,380	-	-	4,110	-	-	-	82,199	134	1,927,080
PERIOD 2d - Decontamination Following Wet Fuel Storage																					
Period 2d Direct Decommissioning Activities																					
2d.1.1	Remove spent fuel racks	557	49	108	116	-	2,099	-	844	3,772	3,772	-	-	-	7,653	-	-	-	505,842	906	-
Disposal of Plant Systems																					
2d.1.2.1	Cranes/Heavy Loads/Rigging - RCA	-	3	0	1	9	-	-	2	14	14	-	-	103	-	-	-	-	4,184	48	-
2d.1.2.2	Electrical - Contaminated Fuel Pool	-	38	1	2	20	2	-	14	77	77	-	-	240	9	-	-	-	10,357	665	-
2d.1.2.3	Electrical - Decontam. Fuel Pool Area	-	242	4	16	206	-	-	94	562	562	-	-	2,457	-	-	-	-	99,783	4,090	-
2d.1.2.4	Fire - RCA - Fuel Pool Area	-	9	0	0	5	-	-	3	18	18	-	-	62	-	-	-	-	2,499	143	-
2d.1.2.5	Fuel Pool Cooling & Cleanup	210	354	33	28	99	368	-	308	1,399	1,399	-	-	1,179	1,341	-	-	-	136,502	8,380	-
2d.1.2.6	Fuel Pool Cooling & Cleanup - Insulated	23	34	3	2	6	32	-	30	129	129	-	-	67	117	-	-	-	10,447	848	-
2d.1.2.7	HVAC Ductwork - Fuel Pool Area	-	29	1	2	25	3	-	12	72	72	-	-	296	11	-	-	-	12,762	457	-
2d.1.2.8	HVAC/Chilled Water - RCA Fuel Pool Area	-	27	0	1	19	-	-	10	57	57	-	-	223	-	-	-	-	9,072	397	-
2d.1.2.9	Instrument & Service Air-RCA-Fuel Pool	-	24	0	2	22	-	-	10	58	58	-	-	267	-	-	-	-	10,841	357	-
2d.1.2	Totals	233	760	42	55	409	405	-	482	2,386	2,386	-	-	4,894	1,479	-	-	-	296,447	15,385	-
Decontamination of Site Buildings																					
2d.1.3.1	Reactor (Post Fuel)	791	2,225	89	642	165	8,016	-	3,086	15,012	15,012	-	-	1,969	43,028	-	-	-	2,677,024	45,625	-
2d.1.3	Totals	791	2,225	89	642	165	8,016	-	3,086	15,012	15,012	-	-	1,969	43,028	-	-	-	2,677,024	45,625	-
2d.1.4	Scaffolding in support of decommissioning	-	478	6	2	24	6	-	126	642	642	-	-	257	23	-	-	-	13,086	5,641	-
2d.1	Subtotal Period 2d Activity Costs	1,581	3,511	245	815	598	10,527	-	4,536	21,813	21,813	-	-	7,120	52,182	-	-	-	3,492,399	67,557	-
Period 2d Additional Costs																					
2d.2.1	License Termination Survey Planning	-	-	-	-	-	-	1,104	331	1,435	1,435	-	-	-	-	-	-	-	-	-	12,480
2d.2.2	Remedial Action Surveys	-	-	-	-	-	-	765	229	994	994	-	-	-	-	-	-	-	-	15,661	-
2d.2	Subtotal Period 2d Additional Costs	-	-	-	-	-	-	1,868	561	2,429	2,429	-	-	-	-	-	-	-	-	15,661	12,480
Period 2d Collateral Costs																					
2d.3.1	Process decommissioning water waste	26	-	21	52	-	90	-	45	235	235	-	-	-	204	-	-	-	12,210	40	-
2d.3.2	Process decommissioning chemical flush waste	1	-	25	89	-	197	-	65	376	376	-	-	-	249	-	-	-	26,553	47	-
2d.3.3	Small tool allowance	-	74	-	-	-	-	-	11	86	86	-	-	-	-	-	-	-	-	-	-
2d.3.4	Decommissioning Equipment Disposition	-	-	137	62	556	145	-	143	1,043	1,043	-	-	6,000	529	-	-	-	304,968	88	-
2d.3.5	Spent Fuel Capital and Transfer	-	-	-	-	-	-	11,181	1,677	12,859	-	12,859	-	-	-	-	-	-	-	-	-
2d.3	Subtotal Period 2d Collateral Costs	26	74	182	203	556	432	11,181	1,942	14,598	1,739	12,859	-	6,000	982	-	-	-	343,731	174	-

Monticello Nuclear Generating Plant
Decommissioning Cost Analysis

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Table D
Monticello Nuclear Generating Plant
DECON 60 YR of Fuel Storage Decommissioning Cost Estimate
(Thousands of 2014 Dollars)

Activity Index	Activity Description	Decon Cost	Removal Cost	Packaging Costs	Transport Costs	Off-Site Processing Costs	LLRW Disposal Costs	Other Costs	Total Contingency	Total Costs	NRC Lic. Term. Costs	Spent Fuel Management Costs	Site Restoration Costs	Processed Volume Cu. Feet	Burial Volumes				Burial / Processed Wt., Lbs.	Craft Manhours	Utility and Contractor Manhours
															Class A Cu. Feet	Class B Cu. Feet	Class C Cu. Feet	GTCC Cu. Feet			
Period 2d Period-Dependent Costs																					
2d.4.1	Decon supplies	169	-	-	-	-	-	-	42	212	212	-	-	-	-	-	-	-	-	-	-
2d.4.2	Insurance	-	-	-	-	-	-	442	44	487	487	-	-	-	-	-	-	-	-	-	-
2d.4.3	Property taxes	-	-	-	-	-	-	686	69	755	755	-	-	-	-	-	-	-	-	-	-
2d.4.4	Health physics supplies	-	714	-	-	-	-	-	178	892	892	-	-	-	-	-	-	-	-	-	-
2d.4.5	Heavy equipment rental	-	1,515	-	-	-	-	-	227	1,742	1,742	-	-	-	-	-	-	-	-	-	-
2d.4.6	Disposal of DAW generated	-	-	42	15	-	160	-	46	263	263	-	-	-	2,030	-	-	-	40,600	66	-
2d.4.7	Plant energy budget	-	-	-	-	-	-	1,064	160	1,223	1,223	-	-	-	-	-	-	-	-	-	-
2d.4.8	NRC Fees	-	-	-	-	-	-	401	40	441	441	-	-	-	-	-	-	-	-	-	-
2d.4.9	Emergency Planning Fees	-	-	-	-	-	-	1,935	194	2,129	-	2,129	-	-	-	-	-	-	-	-	-
2d.4.10	Fixed Overhead	-	-	-	-	-	-	1,400	210	1,610	1,610	-	-	-	-	-	-	-	-	-	-
2d.4.11	Liquid Radwaste Processing Equipment/Services	-	-	-	-	-	-	302	45	347	347	-	-	-	-	-	-	-	-	-	-
2d.4.12	ISFSI Operating Costs	-	-	-	-	-	-	72	11	83	-	83	-	-	-	-	-	-	-	-	-
2d.4.13	Railroad Track Maintenance	-	-	-	-	-	-	80	12	92	92	-	-	-	-	-	-	-	-	-	-
2d.4.14	Security Staff Cost	-	-	-	-	-	-	1,917	288	2,205	2,205	-	-	-	-	-	-	-	-	-	52,250
2d.4.15	DOC Staff Cost	-	-	-	-	-	-	5,802	870	6,672	6,672	-	-	-	-	-	-	-	-	-	78,571
2d.4.16	Utility Staff Cost	-	-	-	-	-	-	8,686	1,303	9,989	9,989	-	-	-	-	-	-	-	-	-	150,071
2d.4	Subtotal Period 2d Period-Dependent Costs	169	2,229	42	15	-	160	22,788	3,739	29,142	26,931	2,211	-	-	2,030	-	-	-	40,600	66	280,893
2d.0	TOTAL PERIOD 2d COST	1,777	5,814	469	1,033	1,154	11,118	35,838	10,778	67,982	52,912	15,070	-	13,120	55,194	-	-	-	3,876,730	83,458	293,373
PERIOD 2f - License Termination																					
Period 2f Direct Decommissioning Activities																					
2f.1.1	ORISE confirmatory survey	-	-	-	-	-	-	163	49	212	212	-	-	-	-	-	-	-	-	-	-
2f.1.2	Terminate license	-	-	-	-	-	-	-	-	a	-	-	-	-	-	-	-	-	-	-	-
2f.1	Subtotal Period 2f Activity Costs	-	-	-	-	-	-	163	49	212	212	-	-	-	-	-	-	-	-	-	-
Period 2f Additional Costs																					
2f.2.1	License Termination Survey	-	-	-	-	-	-	5,936	1,781	7,717	7,717	-	-	-	-	-	-	-	-	96,197	6,240
2f.2	Subtotal Period 2f Additional Costs	-	-	-	-	-	-	5,936	1,781	7,717	7,717	-	-	-	-	-	-	-	-	96,197	6,240
Period 2f Collateral Costs																					
2f.3.1	DOC staff relocation expenses	-	-	-	-	-	-	1,708	256	1,964	1,964	-	-	-	-	-	-	-	-	-	-
2f.3.2	Spent Fuel Capital and Transfer	-	-	-	-	-	-	40	6	46	-	46	-	-	-	-	-	-	-	-	-
2f.3	Subtotal Period 2f Collateral Costs	-	-	-	-	-	-	1,748	262	2,010	1,964	46	-	-	-	-	-	-	-	-	-
Period 2f Period-Dependent Costs																					
2f.4.1	Insurance	-	-	-	-	-	-	415	42	457	457	-	-	-	-	-	-	-	-	-	-
2f.4.2	Property taxes	-	-	-	-	-	-	624	62	686	686	-	-	-	-	-	-	-	-	-	-
2f.4.3	Health physics supplies	-	568	-	-	-	-	-	142	710	710	-	-	-	-	-	-	-	-	-	-
2f.4.4	Disposal of DAW generated	-	-	7	3	-	28	-	8	46	46	-	-	-	355	-	-	-	7,097	12	-
2f.4.5	Plant energy budget	-	-	-	-	-	-	532	80	612	612	-	-	-	-	-	-	-	-	-	-
2f.4.6	NRC Fees	-	-	-	-	-	-	455	46	501	501	-	-	-	-	-	-	-	-	-	-
2f.4.7	Emergency Planning Fees	-	-	-	-	-	-	241	24	265	-	265	-	-	-	-	-	-	-	-	-
2f.4.8	Fixed Overhead	-	-	-	-	-	-	1,400	210	1,610	1,610	-	-	-	-	-	-	-	-	-	-
2f.4.9	ISFSI Operating Costs	-	-	-	-	-	-	72	11	83	-	83	-	-	-	-	-	-	-	-	-
2f.4.10	Railroad Track Maintenance	-	-	-	-	-	-	80	12	92	92	-	-	-	-	-	-	-	-	-	-
2f.4.11	Security Staff Cost	-	-	-	-	-	-	1,880	282	2,162	2,162	-	-	-	-	-	-	-	-	-	51,071
2f.4.12	DOC Staff Cost	-	-	-	-	-	-	4,394	659	5,053	5,053	-	-	-	-	-	-	-	-	-	57,357
2f.4.13	Utility Staff Cost	-	-	-	-	-	-	4,918	738	5,656	5,656	-	-	-	-	-	-	-	-	-	80,929
2f.4	Subtotal Period 2f Period-Dependent Costs	-	568	7	3	-	28	15,011	2,315	17,932	17,584	348	-	-	355	-	-	-	7,097	12	189,357
2f.0	TOTAL PERIOD 2f COST	-	568	7	3	-	28	22,858	4,407	27,871	27,477	394	-	-	355	-	-	-	7,097	96,208	195,597
PERIOD 2 TOTALS		11,328	55,263	22,575	9,203	25,033	53,570	448,775	118,189	743,936	556,575	186,931	431	288,652	146,282	1,481	1,010	-	21,672,880	804,794	4,454,318

Monticello Nuclear Generating Plant
Decommissioning Cost Analysis

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Table D
Monticello Nuclear Generating Plant
DECON 60 YR of Fuel Storage Decommissioning Cost Estimate
(Thousands of 2014 Dollars)

Activity Index	Activity Description	Decon Cost	Removal Cost	Packaging Costs	Transport Costs	Off-Site Processing Costs	LLRW Disposal Costs	Other Costs	Total Contingency	Total Costs	NRC Lic. Term. Costs	Spent Fuel Management Costs	Site Restoration Costs	Processed Volume Cu. Feet	Burial Volumes				Burial / Processed Wt., Lbs.	Craft Manhours	Utility and Contractor Manhours
															Class A Cu. Feet	Class B Cu. Feet	Class C Cu. Feet	GTCC Cu. Feet			
PERIOD 3b - Site Restoration																					
Period 3b Direct Decommissioning Activities																					
Demolition of Remaining Site Buildings																					
3b.1.1.1	Reactor Building	-	3,541	-	-	-	-	-	531	4,073	-	-	4,073	-	-	-	-	-	-	36,752	-
3b.1.1.2	Condensate Tanks Foundation	-	19	-	-	-	-	-	3	22	-	-	22	-	-	-	-	-	-	219	-
3b.1.1.3	Discharge Retention Basin	-	9	-	-	-	-	-	1	10	-	-	10	-	-	-	-	-	-	110	-
3b.1.1.4	HPCI Room	-	44	-	-	-	-	-	7	50	-	-	50	-	-	-	-	-	-	401	-
3b.1.1.5	Hot Shop	-	21	-	-	-	-	-	3	24	-	-	24	-	-	-	-	-	-	298	-
3b.1.1.6	Hydrogen & Oxygen Storage	-	2	-	-	-	-	-	0	2	-	-	2	-	-	-	-	-	-	21	-
3b.1.1.7	LLRW Storage & Shipping	-	140	-	-	-	-	-	21	161	-	-	161	-	-	-	-	-	-	1,794	-
3b.1.1.8	MSIV	-	4	-	-	-	-	-	1	5	-	-	5	-	-	-	-	-	-	59	-
3b.1.1.9	Offgas Stack	-	232	-	-	-	-	-	35	267	-	-	267	-	-	-	-	-	-	2,668	-
3b.1.1.10	Offgas Storage & Compressor	-	88	-	-	-	-	-	13	101	-	-	101	-	-	-	-	-	-	963	-
3b.1.1.11	Radwaste	-	482	-	-	-	-	-	72	554	-	-	554	-	-	-	-	-	-	5,196	-
3b.1.1.12	Recombiner	-	258	-	-	-	-	-	39	297	-	-	297	-	-	-	-	-	-	2,490	-
3b.1.1.13	Security Barrier	-	362	-	-	-	-	-	54	416	-	-	416	-	-	-	-	-	-	4,083	-
3b.1.1.14	Tank Farm	-	10	-	-	-	-	-	1	11	-	-	11	-	-	-	-	-	-	121	-
3b.1.1.15	Turbine	-	1,514	-	-	-	-	-	227	1,741	-	-	1,741	-	-	-	-	-	-	18,764	-
3b.1.1.16	Turbine Building Addition	-	67	-	-	-	-	-	10	77	-	-	77	-	-	-	-	-	-	971	-
3b.1.1.17	Turbine Pedestal	-	415	-	-	-	-	-	62	478	-	-	478	-	-	-	-	-	-	3,762	-
3b.1.1	Totals	-	7,207	-	-	-	-	-	1,081	8,288	-	-	8,288	-	-	-	-	-	-	78,674	-
Site Closeout Activities																					
3b.1.2	BackFill Site	-	302	-	-	-	-	-	45	347	-	-	347	-	-	-	-	-	-	542	-
3b.1.3	Grade & landscape site	-	864	-	-	-	-	-	130	994	-	-	994	-	-	-	-	-	-	1,841	-
3b.1.4	Final report to NRC	-	-	-	-	-	-	177	27	204	204	-	-	-	-	-	-	-	-	-	1,560
3b.1	Subtotal Period 3b Activity Costs	-	8,374	-	-	-	-	177	1,283	9,833	204	-	9,630	-	-	-	-	-	-	81,057	1,560
Period 3b Additional Costs																					
3b.2.1	Concrete Crushing	-	292	-	-	-	-	9	45	347	-	-	347	-	-	-	-	-	-	1,387	-
3b.2.2	Excavation of Underground Services	-	1,402	-	-	-	-	705	316	2,424	-	-	2,424	-	-	-	-	-	-	13,475	-
3b.2.3	Intake Structure cofferdam	-	285	-	-	-	-	-	43	328	-	-	328	-	-	-	-	-	-	2,540	-
3b.2	Subtotal Period 3b Additional Costs	-	1,980	-	-	-	-	715	404	3,099	-	-	3,099	-	-	-	-	-	-	17,402	-
Period 3b Collateral Costs																					
3b.3.1	Small tool allowance	-	91	-	-	-	-	-	14	105	-	-	105	-	-	-	-	-	-	-	-
3b.3.2	Spent Fuel Capital and Transfer	-	-	-	-	-	-	2,062	309	2,372	-	2,372	-	-	-	-	-	-	-	-	-
3b.3.3	Railroad Track Maintenance SR	-	-	-	-	-	-	185	28	213	-	-	213	-	-	-	-	-	-	-	-
3b.3	Subtotal Period 3b Collateral Costs	-	91	-	-	-	-	2,247	351	2,689	-	2,372	317	-	-	-	-	-	-	-	-
Period 3b Period-Dependent Costs																					
3b.4.1	Insurance	-	-	-	-	-	-	956	96	1,052	-	1,052	-	-	-	-	-	-	-	-	-
3b.4.2	Property taxes	-	-	-	-	-	-	1,159	116	1,274	(0)	1,160	115	-	-	-	-	-	-	-	-
3b.4.3	Heavy equipment rental	-	4,953	-	-	-	-	-	743	5,696	-	-	5,696	-	-	-	-	-	-	-	-
3b.4.4	Plant energy budget	-	-	-	-	-	-	612	92	704	-	-	704	-	-	-	-	-	-	-	-
3b.4.5	NRC ISFSI Fees	-	-	-	-	-	-	440	44	484	-	484	-	-	-	-	-	-	-	-	-
3b.4.6	Emergency Planning Fees	-	-	-	-	-	-	555	55	610	-	610	-	-	-	-	-	-	-	-	-
3b.4.7	ISFSI Operating Costs	-	-	-	-	-	-	166	25	190	-	190	-	-	-	-	-	-	-	-	-
3b.4.8	Fixed Overhead SR	-	-	-	-	-	-	873	131	1,004	-	-	1,004	-	-	-	-	-	-	-	-
3b.4.9	Security Staff Cost	-	-	-	-	-	-	4,327	649	4,976	0	4,229	746	-	-	-	-	-	-	-	117,557
3b.4.10	DOC Staff Cost	-	-	-	-	-	-	9,599	1,440	11,039	-	-	11,039	-	-	-	-	-	-	-	122,983
3b.4.11	Utility Staff Cost	-	-	-	-	-	-	6,284	943	7,226	0	1,518	5,709	-	-	-	-	-	-	-	98,567
3b.4	Subtotal Period 3b Period-Dependent Costs	-	4,953	-	-	-	-	24,970	4,333	34,256	0	9,243	25,013	-	-	-	-	-	-	-	339,107
3b.0	TOTAL PERIOD 3b COST	-	15,397	-	-	-	-	28,109	6,371	49,877	204	11,615	38,059	-	-	-	-	-	-	98,459	340,667
PERIOD 3c - Fuel Storage Operations/Shipping																					
Period 3c Direct Decommissioning Activities																					
Period 3c Collateral Costs																					
3c.3.1	Spent Fuel Capital and Transfer	-	-	-	-	-	-	49,292	7,394	56,686	-	56,686	-	-	-	-	-	-	-	-	-
3c.3	Subtotal Period 3c Collateral Costs	-	-	-	-	-	-	49,292	7,394	56,686	-	56,686	-	-	-	-	-	-	-	-	-

*Monticello Nuclear Generating Plant
Decommissioning Cost Analysis*

Table D
Monticello Nuclear Generating Plant
DECON 60 YR of Fuel Storage Decommissioning Cost Estimate
(Thousands of 2014 Dollars)

Activity Index	Activity Description	Decon Cost	Removal Cost	Packaging Costs	Transport Costs	Off-Site Processing Costs	LLRW Disposal Costs	Other Costs	Total Contingency	Total Costs	NRC Lic. Term. Costs	Spent Fuel Management Costs	Site Restoration Costs	Processed Volume Cu. Feet	Burial Volumes				Burial / Processed Wt., Lbs.	Craft Manhours	Utility and Contractor Manhours
															Class A Cu. Feet	Class B Cu. Feet	Class C Cu. Feet	GTCC Cu. Feet			
Period 3c Period-Dependent Costs																					
3c.4.1	Insurance	-	-	-	-	-	-	15,490	1,549	17,039	-	17,039	-	-	-	-	-	-	-	-	-
3c.4.2	Property taxes	-	-	-	-	-	-	17,160	1,716	18,876	-	18,876	-	-	-	-	-	-	-	-	-
3c.4.3	Plant energy budget	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
3c.4.4	NRC ISFSI Fees	-	-	-	-	-	-	7,128	713	7,841	-	7,841	-	-	-	-	-	-	-	-	-
3c.4.5	Emergency Planning Fees	-	-	-	-	-	-	8,992	899	9,891	-	9,891	-	-	-	-	-	-	-	-	-
3c.4.6	Fixed Overhead	-	-	-	-	-	-	14,143	2,121	16,264	-	16,264	-	-	-	-	-	-	-	-	-
3c.4.7	ISFSI Operating Costs	-	-	-	-	-	-	2,683	402	3,085	-	3,085	-	-	-	-	-	-	-	-	-
3c.4.8	Security Staff Cost	-	-	-	-	-	-	59,847	8,977	68,824	-	68,824	-	-	-	-	-	-	-	-	1,582,354
3c.4.9	Utility Staff Cost	-	-	-	-	-	-	21,517	3,228	24,745	-	24,745	-	-	-	-	-	-	-	-	395,589
3c.4	Subtotal Period 3c Period-Dependent Costs	-	-	-	-	-	-	146,959	19,605	166,564	-	166,564	-	-	-	-	-	-	-	-	1,977,943
3c.0	TOTAL PERIOD 3c COST	-	-	-	-	-	-	196,251	26,999	223,250	-	223,250	-	-	-	-	-	-	-	-	1,977,943
PERIOD 3d - GTCC shipping																					
Period 3d Direct Decommissioning Activities																					
Nuclear Steam Supply System Removal																					
3d.1.1.1	Vessel & Internals GTCC Disposal	-	-	1,462	-	-	6,760	-	1,380	9,602	9,602	-	-	-	-	-	-	1,785	346,570	-	-
3d.1.1	Totals	-	-	1,462	-	-	6,760	-	1,380	9,602	9,602	-	-	-	-	-	-	1,785	346,570	-	-
3d.1	Subtotal Period 3d Activity Costs	-	-	1,462	-	-	6,760	-	1,380	9,602	9,602	-	-	-	-	-	-	1,785	346,570	-	-
Period 3d Collateral Costs																					
3d.3.1	Spent Fuel Capital and Transfer	-	-	-	-	-	-	21,729	3,259	24,988	-	24,988	-	-	-	-	-	-	-	-	-
3d.3	Subtotal Period 3d Collateral Costs	-	-	-	-	-	-	21,729	3,259	24,988	-	24,988	-	-	-	-	-	-	-	-	-
Period 3d Period-Dependent Costs																					
3d.4.1	Insurance	-	-	-	-	-	-	7,722	772	8,494	-	8,494	-	-	-	-	-	-	-	-	-
3d.4.2	Property taxes	-	-	-	-	-	-	8,556	856	9,411	-	9,411	-	-	-	-	-	-	-	-	-
3d.4.3	Plant energy budget	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
3d.4.4	NRC ISFSI Fees	-	-	-	-	-	-	5,089	509	5,597	-	5,597	-	-	-	-	-	-	-	-	-
3d.4.5	Emergency Planning Fees	-	-	-	-	-	-	4,483	448	4,931	-	4,931	-	-	-	-	-	-	-	-	-
3d.4.6	Fixed Overhead	-	-	-	-	-	-	7,051	1,058	8,108	-	8,108	-	-	-	-	-	-	-	-	-
3d.4.7	ISFSI Operating Costs	-	-	-	-	-	-	1,338	201	1,538	-	1,538	-	-	-	-	-	-	-	-	-
3d.4.8	Railroad Track Maintenance	-	-	-	-	-	-	1,777	267	2,044	-	2,044	-	-	-	-	-	-	-	-	-
3d.4.9	Security Staff Cost	-	-	-	-	-	-	29,836	4,475	34,311	-	34,311	-	-	-	-	-	-	-	-	788,863
3d.4.10	Utility Staff Cost	-	-	-	-	-	-	10,727	1,609	12,336	-	12,336	-	-	-	-	-	-	-	-	197,216
3d.4	Subtotal Period 3d Period-Dependent Costs	-	-	-	-	-	-	76,577	10,194	86,772	-	86,772	-	-	-	-	-	-	-	-	986,079
3d.0	TOTAL PERIOD 3d COST	-	-	1,462	-	-	6,760	98,306	14,833	121,362	9,602	111,760	-	-	-	-	-	1,785	346,570	-	986,079
PERIOD 3e - ISFSI Decontamination																					
Period 3e Direct Decommissioning Activities																					
Period 3e Additional Costs																					
3e.2.1	Decommissioning of ISFSI	-	194	3	357	-	2,726	1,784	1,266	6,330	6,330	-	-	-	15,284	-	-	-	1,652,734	10,381	1,872
3e.2	Subtotal Period 3e Additional Costs	-	194	3	357	-	2,726	1,784	1,266	6,330	6,330	-	-	-	15,284	-	-	-	1,652,734	10,381	1,872
Period 3e Collateral Costs																					
3e.3	Subtotal Period 3e Collateral Costs	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Period 3e Period-Dependent Costs																					
3e.4.1	Insurance	-	-	-	-	-	-	84	21	104	104	-	-	-	-	-	-	-	-	-	-
3e.4.2	Property taxes	-	-	-	-	-	-	203	51	253	253	-	-	-	-	-	-	-	-	-	-
3e.4.3	Plant energy budget	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
3e.4.4	Fixed Overhead	-	-	-	-	-	-	167	42	209	209	-	-	-	-	-	-	-	-	-	-
3e.4.5	Security Staff Cost	-	-	-	-	-	-	130	32	162	162	-	-	-	-	-	-	-	-	-	5,013
3e.4.6	Utility Staff Cost	-	-	-	-	-	-	213	53	266	266	-	-	-	-	-	-	-	-	-	3,803
3e.4	Subtotal Period 3e Period-Dependent Costs	-	-	-	-	-	-	795	199	994	994	-	-	-	-	-	-	-	-	-	8,816
3e.0	TOTAL PERIOD 3e COST	-	194	3	357	-	2,726	2,579	1,465	7,324	7,324	-	-	-	15,284	-	-	-	1,652,734	10,381	10,688

Monticello Nuclear Generating Plant
Decommissioning Cost Analysis

Table D
Monticello Nuclear Generating Plant
DECON 60 YR of Fuel Storage Decommissioning Cost Estimate
(Thousands of 2014 Dollars)

Activity Index	Activity Description	Decon Cost	Removal Cost	Packaging Costs	Transport Costs	Off-Site Processing Costs	LLRW Disposal Costs	Other Costs	Total Contingency	Total Costs	NRC Lic. Term. Costs	Spent Fuel Management Costs	Site Restoration Costs	Processed Volume Cu. Feet	Burial Volumes			GTCC Cu. Feet	Burial / Processed Wt., Lbs.	Craft Manhours	Utility and Contractor Manhours
															Class A Cu. Feet	Class B Cu. Feet	Class C Cu. Feet				
PERIOD 3f - ISFSI Site Restoration																					
Period 3f Direct Decommissioning Activities																					
Period 3f Additional Costs																					
3f.2.1	Demolition and Site Restoration of ISFSI	-	938	-	-	-	-	55	149	1,143	-	-	1,143	-	-	-	-	-	-	5,641	160
3f.2	Subtotal Period 3f Additional Costs	-	938	-	-	-	-	55	149	1,143	-	-	1,143	-	-	-	-	-	-	5,641	160
Period 3f Collateral Costs																					
3f.3.1	Small tool allowance	-	9	-	-	-	-	-	1	10	-	-	10	-	-	-	-	-	-	-	-
3f.3	Subtotal Period 3f Collateral Costs	-	9	-	-	-	-	-	1	10	-	-	10	-	-	-	-	-	-	-	-
Period 3f Period-Dependent Costs																					
3f.4.1	Insurance	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
3f.4.2	Property taxes	-	-	-	-	-	-	102	10	112	-	-	112	-	-	-	-	-	-	-	
3f.4.3	Heavy equipment rental	-	106	-	-	-	-	-	16	121	-	-	121	-	-	-	-	-	-	-	
3f.4.4	Plant energy budget	-	-	-	-	-	-	59	9	68	-	-	68	-	-	-	-	-	-	-	
3f.4.5	Fixed Overhead	-	-	-	-	-	-	84	13	97	-	-	97	-	-	-	-	-	-	-	
3f.4.6	Security Staff Cost	-	-	-	-	-	-	65	10	75	-	-	75	-	-	-	-	-	-	2,527	
3f.4.7	Utility Staff Cost	-	-	-	-	-	-	84	13	96	-	-	96	-	-	-	-	-	-	1,569	
3f.4	Subtotal Period 3f Period-Dependent Costs	-	106	-	-	-	-	394	70	570	-	-	570	-	-	-	-	-	-	-	4,096
3f.0	TOTAL PERIOD 3f COST	-	1,053	-	-	-	-	450	220	1,723	-	-	1,723	-	-	-	-	-	-	5,641	4,256
PERIOD 3 TOTALS		-	16,644	1,465	357	-	9,486	325,696	49,888	403,536	17,130	346,625	39,781	-	15,284	-	-	1,785	1,999,304	114,480	3,319,632
TOTAL COST TO DECOMMISSION		14,035	74,568	24,134	9,729	25,045	64,621	906,343	189,441	1,307,916	697,451	569,359	41,106	288,695	162,767	1,711	1,010	1,785	23,735,370	951,124	8,834,088

TOTAL COST TO DECOMMISSION WITH 16.94% CONTINGENCY:	\$1,307,916	thousands of 2014 dollars
TOTAL NRC LICENSE TERMINATION COST IS 53.33% OR:	\$697,451	thousands of 2014 dollars
SPENT FUEL MANAGEMENT COST IS 43.53% OR:	\$569,359	thousands of 2014 dollars
NON-NUCLEAR DEMOLITION COST IS 3.14% OR:	\$41,106	thousands of 2014 dollars
TOTAL RADWASTE VOLUME BURIED (EXCLUDING GTCC):	165,488	Cubic Feet
TOTAL GREATER THAN CLASS C RADWASTE VOLUME GENERATED	1,785	Cubic Feet
TOTAL SCRAP METAL REMOVED:	15,499	Tons
TOTAL CRAFT LABOR REQUIREMENTS:	951,124	Man-hours

End Notes:
n/a - indicates that this activity not charged as decommissioning expense.
a - indicates that this activity performed by decommissioning staff.
0 - indicates that this value is less than 0.5 but is non-zero.
a cell containing " - " indicates a zero value

APPENDIX E

DETAILED COST ANALYSIS

SCENARIO 3

DECON DECOMMISSIONING COST ESTIMATE

WITH 100 YEARS OF SPENT FUEL STORAGE

AND PERIODIC DSC REPLACEMENT

Monticello Nuclear Generating Plant
Decommissioning Cost Analysis

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Table E
Monticello Nuclear Generating Plant
DECON 100 YR Fuel Storage with Recasking Decommissioning Cost Estimate
(Thousands of 2014 Dollars)

Activity Index	Activity Description	Decon Cost	Removal Cost	Packaging Costs	Transport Costs	Off-Site Processing Costs	LLRW Disposal Costs	Other Costs	Total Contingency	Total Costs	NRC Lic. Term. Costs	Spent Fuel Management Costs	Site Restoration Costs	Processed Volume Cu. Feet	Burial Volumes				Burial / Processed Wt., Lbs.	Craft Manhours	Utility and Contractor Manhours
															Class A Cu. Feet	Class B Cu. Feet	Class C Cu. Feet	GTCC Cu. Feet			
PERIOD 1a - Shutdown through Transition																					
Period 1a Direct Decommissioning Activities																					
1a.1.1	Prepare preliminary decommissioning cost	-	-	-	-	-	-	148	22	170	170	-	-	-	-	-	-	-	-	-	1,300
1a.1.2	Notification of Cessation of Operations									a											
1a.1.3	Remove fuel & source material									n/a											
1a.1.4	Notification of Permanent Defueling									a											
1a.1.5	Deactivate plant systems & process waste									a											
1a.1.6	Prepare and submit PSDAR	-	-	-	-	-	-	227	34	261	261	-	-	-	-	-	-	-	-	-	2,000
1a.1.7	Review plant dwgs & specs.	-	-	-	-	-	-	522	78	601	601	-	-	-	-	-	-	-	-	-	4,600
1a.1.8	Perform detailed rad survey									a											
1a.1.9	Estimate by-product inventory	-	-	-	-	-	-	114	17	131	131	-	-	-	-	-	-	-	-	-	1,000
1a.1.10	End product description	-	-	-	-	-	-	114	17	131	131	-	-	-	-	-	-	-	-	-	1,000
1a.1.11	Detailed by-product inventory	-	-	-	-	-	-	148	22	170	170	-	-	-	-	-	-	-	-	-	1,300
1a.1.12	Define major work sequence	-	-	-	-	-	-	851	128	979	979	-	-	-	-	-	-	-	-	-	7,500
1a.1.13	Perform SER and EA	-	-	-	-	-	-	352	53	405	405	-	-	-	-	-	-	-	-	-	3,100
1a.1.14	Perform Site-Specific Cost Study	-	-	-	-	-	-	568	85	653	653	-	-	-	-	-	-	-	-	-	5,000
1a.1.15	Prepare/submit License Termination Plan	-	-	-	-	-	-	465	70	535	535	-	-	-	-	-	-	-	-	-	4,096
1a.1.16	Receive NRC approval of termination plan									a											
Activity Specifications																					
1a.1.17.1	Plant & temporary facilities	-	-	-	-	-	-	559	84	642	578	-	64	-	-	-	-	-	-	-	4,920
1a.1.17.2	Plant systems	-	-	-	-	-	-	473	71	544	490	-	54	-	-	-	-	-	-	-	4,167
1a.1.17.3	NSSS Decontamination Flush	-	-	-	-	-	-	57	9	65	65	-	-	-	-	-	-	-	-	-	500
1a.1.17.4	Reactor internals	-	-	-	-	-	-	806	121	927	927	-	-	-	-	-	-	-	-	-	7,100
1a.1.17.5	Reactor vessel	-	-	-	-	-	-	738	111	849	849	-	-	-	-	-	-	-	-	-	6,500
1a.1.17.6	Sacrificial shield	-	-	-	-	-	-	57	9	65	65	-	-	-	-	-	-	-	-	-	500
1a.1.17.7	Moisture separators/reheaters	-	-	-	-	-	-	114	17	131	131	-	-	-	-	-	-	-	-	-	1,000
1a.1.17.8	Reinforced concrete	-	-	-	-	-	-	182	27	209	104	-	104	-	-	-	-	-	-	-	1,600
1a.1.17.9	Main Turbine	-	-	-	-	-	-	237	36	273	273	-	-	-	-	-	-	-	-	-	2,088
1a.1.17.10	Main Condensers	-	-	-	-	-	-	237	36	273	273	-	-	-	-	-	-	-	-	-	2,088
1a.1.17.11	Pressure suppression structure	-	-	-	-	-	-	227	34	261	261	-	-	-	-	-	-	-	-	-	2,000
1a.1.17.12	Drywell	-	-	-	-	-	-	182	27	209	209	-	-	-	-	-	-	-	-	-	1,600
1a.1.17.13	Plant structures & buildings	-	-	-	-	-	-	354	53	407	204	-	204	-	-	-	-	-	-	-	3,120
1a.1.17.14	Waste management	-	-	-	-	-	-	522	78	601	601	-	-	-	-	-	-	-	-	-	4,600
1a.1.17.15	Facility & site closeout	-	-	-	-	-	-	102	15	118	59	-	59	-	-	-	-	-	-	-	900
1a.1.17	Total	-	-	-	-	-	-	4,846	727	5,573	5,087	-	486	-	-	-	-	-	-	-	42,683
Planning & Site Preparations																					
1a.1.18	Prepare dismantling sequence	-	-	-	-	-	-	272	41	313	313	-	-	-	-	-	-	-	-	-	2,400
1a.1.19	Plant prep. & temp. svces	-	-	-	-	-	-	3,000	450	3,450	3,450	-	-	-	-	-	-	-	-	-	-
1a.1.20	Design water clean-up system	-	-	-	-	-	-	159	24	183	183	-	-	-	-	-	-	-	-	-	1,400
1a.1.21	Rigging/Cont. Cntrl Envlp/s/tooling/etc.	-	-	-	-	-	-	2,300	345	2,645	2,645	-	-	-	-	-	-	-	-	-	-
1a.1.22	Procure casks/liners & containers	-	-	-	-	-	-	140	21	161	161	-	-	-	-	-	-	-	-	-	1,230
1a.1	Subtotal Period 1a Activity Costs	-	-	-	-	-	-	14,224	2,134	16,358	15,873	-	486	-	-	-	-	-	-	-	78,609
Period 1a Collateral Costs																					
1a.3.1	Spent Fuel Capital and Transfer	-	-	-	-	-	-	25,293	3,794	29,087	-	29,087	-	-	-	-	-	-	-	-	-
1a.3	Subtotal Period 1a Collateral Costs	-	-	-	-	-	-	25,293	3,794	29,087	-	29,087	-	-	-	-	-	-	-	-	-
Period 1a Period-Dependent Costs																					
1a.4.1	Insurance	-	-	-	-	-	-	1,418	142	1,560	1,560	-	-	-	-	-	-	-	-	-	-
1a.4.2	Property taxes	-	-	-	-	-	-	2,718	272	2,990	2,990	-	-	-	-	-	-	-	-	-	-
1a.4.3	Health physics supplies	-	490	-	-	-	-	-	123	613	613	-	-	-	-	-	-	-	-	-	-
1a.4.4	Heavy equipment rental	-	528	-	-	-	-	-	79	608	608	-	-	-	-	-	-	-	-	-	-
1a.4.5	Disposal of DAW generated	-	-	13	4	-	48	-	14	79	79	-	-	-	610	-	-	-	12,190	20	-
1a.4.6	Plant energy budget	-	-	-	-	-	-	3,530	530	4,060	4,060	-	-	-	-	-	-	-	-	-	-
1a.4.7	NRC Fees	-	-	-	-	-	-	1,181	118	1,299	1,299	-	-	-	-	-	-	-	-	-	-
1a.4.8	Emergency Planning Fees	-	-	-	-	-	-	3,121	312	3,433	-	3,433	-	-	-	-	-	-	-	-	-
1a.4.9	Fixed Overhead	-	-	-	-	-	-	2,434	365	2,799	2,799	-	-	-	-	-	-	-	-	-	-
1a.4.10	Spent Fuel Pool O&M	-	-	-	-	-	-	791	119	910	-	910	-	-	-	-	-	-	-	-	-
1a.4.11	ISFSI Operating Costs	-	-	-	-	-	-	95	14	110	-	110	-	-	-	-	-	-	-	-	-
1a.4.12	Railroad Track Maintenance	-	-	-	-	-	-	107	16	123	123	-	-	-	-	-	-	-	-	-	-
1a.4.13	Security Staff Cost	-	-	-	-	-	-	5,349	802	6,151	6,151	-	-	-	-	-	-	-	-	-	157,471
1a.4.14	Utility Staff Cost	-	-	-	-	-	-	22,165	3,325	25,489	25,489	-	-	-	-	-	-	-	-	-	423,400
1a.4	Subtotal Period 1a Period-Dependent Costs	-	1,018	13	4	-	48	42,909	6,230	50,222	45,769	4,453	-	-	610	-	-	-	12,190	20	580,871
1a.0	TOTAL PERIOD 1a COST	-	1,018	13	4	-	48	82,426	12,158	95,667	61,642	33,540	486	-	610	-	-	-	12,190	20	659,480

Monticello Nuclear Generating Plant
Decommissioning Cost Analysis

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Table E
Monticello Nuclear Generating Plant
DECON 100 YR Fuel Storage with Recasking Decommissioning Cost Estimate
(Thousands of 2014 Dollars)

Activity Index	Activity Description	Decon Cost	Removal Cost	Packaging Costs	Transport Costs	Off-Site Processing Costs	LLRW Disposal Costs	Other Costs	Total Contingency	Total Costs	NRC Lic. Term. Costs	Spent Fuel Management Costs	Site Restoration Costs	Processed Volume Cu. Feet	Burial Volumes				Burial / Processed Wt., Lbs.	Craft Manhours	Utility and Contractor Manhours
															Class A Cu. Feet	Class B Cu. Feet	Class C Cu. Feet	GTCC Cu. Feet			
PERIOD 1b - Decommissioning Preparations																					
Period 1b Direct Decommissioning Activities																					
Detailed Work Procedures																					
1b.1.1.1	Plant systems	-	-	-	-	-	-	537	81	618	556	-	62	-	-	-	-	-	-	-	4,733
1b.1.1.2	NSSS Decontamination Flush	-	-	-	-	-	-	114	17	131	131	-	-	-	-	-	-	-	-	-	1,000
1b.1.1.3	Reactor internals	-	-	-	-	-	-	454	68	522	522	-	-	-	-	-	-	-	-	-	4,000
1b.1.1.4	Remaining buildings	-	-	-	-	-	-	153	23	176	44	-	132	-	-	-	-	-	-	-	1,350
1b.1.1.5	CRD housings & NIs	-	-	-	-	-	-	114	17	131	131	-	-	-	-	-	-	-	-	-	1,000
1b.1.1.6	Incore instrumentation	-	-	-	-	-	-	114	17	131	131	-	-	-	-	-	-	-	-	-	1,000
1b.1.1.7	Removal primary containment	-	-	-	-	-	-	227	34	261	261	-	-	-	-	-	-	-	-	-	2,000
1b.1.1.8	Reactor vessel	-	-	-	-	-	-	412	62	474	474	-	-	-	-	-	-	-	-	-	3,630
1b.1.1.9	Facility closeout	-	-	-	-	-	-	136	20	157	78	-	78	-	-	-	-	-	-	-	1,200
1b.1.1.10	Sacrificial shield	-	-	-	-	-	-	136	20	157	157	-	-	-	-	-	-	-	-	-	1,200
1b.1.1.11	Reinforced concrete	-	-	-	-	-	-	114	17	131	65	-	65	-	-	-	-	-	-	-	1,000
1b.1.1.12	Main Turbine	-	-	-	-	-	-	236	35	272	272	-	-	-	-	-	-	-	-	-	2,080
1b.1.1.13	Main Condensers	-	-	-	-	-	-	237	36	273	273	-	-	-	-	-	-	-	-	-	2,088
1b.1.1.14	Moisture separators & reheaters	-	-	-	-	-	-	227	34	261	261	-	-	-	-	-	-	-	-	-	2,000
1b.1.1.15	Radwaste building	-	-	-	-	-	-	310	46	356	321	-	36	-	-	-	-	-	-	-	2,730
1b.1.1.16	Reactor building	-	-	-	-	-	-	310	46	356	321	-	36	-	-	-	-	-	-	-	2,730
1b.1.1	Total	-	-	-	-	-	-	3,831	575	4,405	3,996	-	409	-	-	-	-	-	-	-	33,741
1b.1.2	Decon NSSS	262	-	-	-	-	-	-	131	393	393	-	-	-	-	-	-	-	-	1,067	-
1b.1	Subtotal Period 1b Activity Costs	262	-	-	-	-	-	3,831	705	4,798	4,389	-	409	-	-	-	-	-	-	1,067	33,741
Period 1b Additional Costs																					
1b.2.1	Spent fuel pool isolation	-	-	-	-	-	-	10,813	1,622	12,434	12,434	-	-	-	-	-	-	-	-	-	-
1b.2.2	Site Characterization	-	-	-	-	-	-	5,244	1,573	6,818	6,818	-	-	-	-	-	-	-	-	30,500	10,852
1b.2.3	Mixed & RCRA Waste	-	-	26	19	12	-	-	7	65	65	-	-	43	-	-	-	-	5,253	163	-
1b.2	Subtotal Period 1b Additional Costs	-	-	26	19	12	-	16,057	3,202	19,317	19,317	-	-	43	-	-	-	-	5,253	30,663	10,852
Period 1b Collateral Costs																					
1b.3.1	Decon equipment	881	-	-	-	-	-	-	132	1,013	1,013	-	-	-	-	-	-	-	-	-	-
1b.3.2	DOC staff relocation expenses	-	-	-	-	-	-	1,708	256	1,964	1,964	-	-	-	-	-	-	-	-	-	-
1b.3.3	Process decommissioning water waste	37	-	24	60	-	104	-	56	280	280	-	-	-	233	-	-	-	13,986	45	-
1b.3.4	Process decommissioning chemical flush waste	1	-	23	82	-	1,385	-	361	1,852	1,852	-	-	-	-	231	-	-	24,599	43	-
1b.3.5	Small tool allowance	-	2	-	-	-	-	-	0	2	2	-	-	-	-	-	-	-	-	-	-
1b.3.6	Pipe cutting equipment	-	1,100	-	-	-	-	-	165	1,265	1,265	-	-	-	-	-	-	-	-	-	-
1b.3.7	Decon rig	1,500	-	-	-	-	-	-	225	1,725	1,725	-	-	-	-	-	-	-	-	-	-
1b.3.8	Spent Fuel Capital and Transfer	-	-	-	-	-	-	27	4	31	-	31	-	-	-	-	-	-	-	-	-
1b.3	Subtotal Period 1b Collateral Costs	2,418	1,102	47	142	-	1,489	1,734	1,199	8,131	8,101	31	-	-	233	231	-	-	38,585	89	-
Period 1b Period-Dependent Costs																					
1b.4.1	Decon supplies	27	-	-	-	-	-	-	7	34	34	-	-	-	-	-	-	-	-	-	-
1b.4.2	Insurance	-	-	-	-	-	-	711	71	782	782	-	-	-	-	-	-	-	-	-	-
1b.4.3	Property taxes	-	-	-	-	-	-	1,339	134	1,472	1,472	-	-	-	-	-	-	-	-	-	-
1b.4.4	Health physics supplies	-	276	-	-	-	-	-	69	345	345	-	-	-	-	-	-	-	-	-	-
1b.4.5	Heavy equipment rental	-	265	-	-	-	-	-	40	305	305	-	-	-	-	-	-	-	-	-	-
1b.4.6	Disposal of DAW generated	-	-	7	3	-	28	-	8	46	46	-	-	-	358	-	-	-	7,159	12	-
1b.4.7	Plant energy budget	-	-	-	-	-	-	3,540	531	4,071	4,071	-	-	-	-	-	-	-	-	-	-
1b.4.8	NRC Fees	-	-	-	-	-	-	346	35	381	381	-	-	-	-	-	-	-	-	-	-
1b.4.9	Emergency Planning Fees	-	-	-	-	-	-	1,565	156	1,721	-	1,721	-	-	-	-	-	-	-	-	-
1b.4.10	Fixed Overhead	-	-	-	-	-	-	1,220	183	1,403	1,403	-	-	-	-	-	-	-	-	-	-
1b.4.11	Spent Fuel Pool O&M	-	-	-	-	-	-	397	59	456	-	456	-	-	-	-	-	-	-	-	-
1b.4.12	ISFSI Operating Costs	-	-	-	-	-	-	48	7	55	-	55	-	-	-	-	-	-	-	-	-
1b.4.13	Railroad Track Maintenance	-	-	-	-	-	-	53	8	62	62	-	-	-	-	-	-	-	-	-	-
1b.4.14	Security Staff Cost	-	-	-	-	-	-	2,682	402	3,084	3,084	-	-	-	-	-	-	-	-	-	78,951
1b.4.15	DOC Staff Cost	-	-	-	-	-	-	4,755	713	5,468	5,468	-	-	-	-	-	-	-	-	-	63,789
1b.4.16	Utility Staff Cost	-	-	-	-	-	-	11,170	1,675	12,845	12,845	-	-	-	-	-	-	-	-	-	213,326
1b.4	Subtotal Period 1b Period-Dependent Costs	27	541	7	3	-	28	27,824	4,099	32,530	30,297	2,232	-	-	358	-	-	-	7,159	12	356,066
1b.0	TOTAL PERIOD 1b COST	2,707	1,643	80	164	12	1,517	49,446	9,207	64,776	62,103	2,263	409	43	591	231	-	-	50,997	31,830	400,659
PERIOD 1 TOTALS		2,707	2,661	93	168	12	1,565	131,872	21,364	160,443	123,745	35,803	894	43	1,201	231	-	-	63,188	31,850	1,060,139

Table E
Monticello Nuclear Generating Plant
DECON 100 YR Fuel Storage with Recasking Decommissioning Cost Estimate
(Thousands of 2014 Dollars)

Activity Index	Activity Description	Decon Cost	Removal Cost	Packaging Costs	Transport Costs	Off-Site	LLRW	Other Costs	Total Contingency	Total Costs	NRC	Spent Fuel	Site	Processed Volume Cu. Feet	Burial Volumes				Burial /	Craft Manhours	Utility and
						Processing Costs	Disposal Costs				Lic. Term. Costs	Management Costs	Restoration Costs		Class A Cu. Feet	Class B Cu. Feet	Class C Cu. Feet	GTCC Cu. Feet	Processed Wt., Lbs.		Contractor Manhours
PERIOD 2a - Large Component Removal																					
Period 2a Direct Decommissioning Activities																					
Nuclear Steam Supply System Removal																					
2a.1.1.1	Recirculation System Piping & Valves	92	78	17	22	-	407	-	172	789	789	-	-	-	858	-	-	-	98,047	2,888	-
2a.1.1.2	Recirculation Pumps & Motors	33	52	15	37	21	423	-	146	727	727	-	-	96	945	-	-	-	112,200	1,563	-
2a.1.1.3	CRDMs & NIs Removal	162	857	400	98	-	887	-	572	2,976	2,976	-	-	-	3,741	-	-	-	213,700	17,768	-
2a.1.1.4	Reactor Vessel Internals	193	3,392	15,478	2,739	-	19,466	309	16,974	58,552	58,552	-	-	-	1,252	1,481	1,010	-	312,338	27,675	1,239
2a.1.1.5	Reactor Vessel	94	7,234	2,229	976	-	3,459	309	8,050	22,352	22,352	-	-	-	10,736	-	-	-	1,089,965	27,675	1,239
2a.1.1	Totals	574	11,614	18,139	3,873	21	24,642	619	25,914	85,396	85,396	-	-	96	17,532	1,481	1,010	-	1,826,250	77,569	2,478
Removal of Major Equipment																					
2a.1.2	Main Turbine/Generator	-	326	1,455	390	3,137	352	-	844	6,504	6,504	-	-	25,377	1,413	-	-	-	1,616,032	5,557	-
2a.1.3	Main Condensers	-	1,109	379	140	1,613	199	-	628	4,067	4,067	-	-	17,396	727	-	-	-	830,822	18,831	-
Cascading Costs from Clean Building Demolition																					
2a.1.4.1	Reactor Building	-	611	-	-	-	-	-	92	703	703	-	-	-	-	-	-	-	-	6,238	-
2a.1.4.2	Radwaste	-	53	-	-	-	-	-	8	61	61	-	-	-	-	-	-	-	-	569	-
2a.1.4.3	Turbine	-	157	-	-	-	-	-	24	180	180	-	-	-	-	-	-	-	-	1,884	-
2a.1.4	Totals	-	821	-	-	-	-	-	123	944	944	-	-	-	-	-	-	-	-	8,691	-
Disposal of Plant Systems																					
2a.1.5.1	Automatic Press Relief	-	98	6	8	67	57	-	51	287	287	-	-	803	206	-	-	-	46,236	1,656	-
2a.1.5.2	Chemistry Sampling	-	23	1	2	13	10	-	11	59	59	-	-	156	37	-	-	-	8,774	400	-
2a.1.5.3	Chemistry Sampling - Insulated	-	1	0	0	-	0	-	0	2	2	-	-	-	1	-	-	-	73	28	-
2a.1.5.4	Circulating Water - RCA	-	172	10	44	557	-	-	134	917	917	-	-	6,656	-	-	-	-	270,307	2,860	-
2a.1.5.5	Combustible Gas Control - Insul - RCA	-	24	0	1	18	-	-	9	53	53	-	-	212	-	-	-	-	8,617	378	-
2a.1.5.6	Combustible Gas Control - RCA	-	15	0	2	24	-	-	8	49	49	-	-	285	-	-	-	-	11,577	245	-
2a.1.5.7	Condensate & Feedwater	-	818	178	244	1,669	2,008	-	1,011	5,929	5,929	-	-	19,947	7,319	-	-	-	1,293,969	14,196	-
2a.1.5.8	Condensate & Feedwater - Insulated	-	408	33	46	349	331	-	247	1,414	1,414	-	-	4,176	1,207	-	-	-	249,413	6,964	-
2a.1.5.9	Condensate Demin	-	451	28	37	280	274	-	232	1,303	1,303	-	-	3,346	1,000	-	-	-	201,994	7,618	-
2a.1.5.10	Condensate Storage	-	604	29	60	597	216	-	306	1,811	1,811	-	-	7,131	795	-	-	-	341,719	10,345	-
2a.1.5.11	Control Rod Drive	-	2	0	0	2	1	-	1	7	7	-	-	19	4	-	-	-	1,015	41	-
2a.1.5.12	Control Rod Drive Hydraulic	-	344	15	20	139	154	-	150	822	822	-	-	1,658	562	-	-	-	104,537	5,898	-
2a.1.5.13	Core Spray	-	66	18	37	367	143	-	115	745	745	-	-	4,384	521	-	-	-	212,510	1,163	-
2a.1.5.14	Core Spray - Insulated	-	120	7	9	68	72	-	60	338	338	-	-	818	264	-	-	-	50,680	2,033	-
2a.1.5.15	Demin Water - Insulated - RCA	-	12	0	1	7	-	-	4	24	24	-	-	85	-	-	-	-	3,445	181	-
2a.1.5.16	Demin Water - RCA	-	34	0	2	21	-	-	12	69	69	-	-	253	-	-	-	-	10,278	508	-
2a.1.5.17	Diesel Oil - RCA	-	2	0	0	2	-	-	1	4	4	-	-	23	-	-	-	-	931	25	-
2a.1.5.18	Drywell Atmosphere Cooling - RCA	-	31	1	4	46	-	-	15	97	97	-	-	548	-	-	-	-	22,244	550	-
2a.1.5.19	EDG Emerg Service Water - Insul - RCA	-	0	0	0	0	-	-	0	1	1	-	-	2	-	-	-	-	84	4	-
2a.1.5.20	Electrical - Clean	-	11	-	-	-	-	-	2	12	-	-	12	-	-	-	-	-	-	182	-
2a.1.5.21	Emergency Service Water - Insul - RCA	-	18	0	1	11	-	-	6	37	37	-	-	137	-	-	-	-	5,544	281	-
2a.1.5.22	Emergency Service Water - RCA	-	1	0	0	1	-	-	1	3	3	-	-	13	-	-	-	-	512	22	-
2a.1.5.23	GEZIP - RCA	-	3	0	1	9	-	-	2	14	14	-	-	103	-	-	-	-	4,184	48	-
2a.1.5.24	Generator Physical Design - RCA	-	4	0	0	3	-	-	1	8	8	-	-	31	-	-	-	-	1,250	67	-
2a.1.5.25	H2-O2 Control Analyzing	-	5	0	0	0	4	-	2	12	12	-	-	6	13	-	-	-	1,089	81	-
2a.1.5.26	H2-O2 Control Analyzing - Insulated	-	5	0	0	0	4	-	2	12	12	-	-	6	13	-	-	-	1,089	81	-
2a.1.5.27	High Pressure Coolant Injection	-	56	6	10	81	57	-	42	252	252	-	-	972	209	-	-	-	53,266	966	-
2a.1.5.28	High Pressure Coolant Injection - Insula	-	182	13	18	134	132	-	103	582	582	-	-	1,598	481	-	-	-	96,733	3,079	-
2a.1.5.29	Hydrogen Cooling	-	7	-	-	-	-	-	1	8	-	-	8	-	-	-	-	-	-	118	-
2a.1.5.30	Hydrogen Cooling - RCA	-	6	0	0	3	-	-	2	11	11	-	-	39	-	-	-	-	1,600	79	-
2a.1.5.31	Hydrogen Seal Oil - RCA	-	14	0	1	16	-	-	6	38	38	-	-	189	-	-	-	-	7,669	212	-
2a.1.5.32	Hydrogen Water Chemistry - RCA	-	20	0	1	12	-	-	7	40	40	-	-	140	-	-	-	-	5,672	304	-
2a.1.5.33	Instrument & Service Air - RCA	-	185	3	12	148	-	-	71	418	418	-	-	1,768	-	-	-	-	71,810	2,733	-
2a.1.5.34	Main Condenser	-	162	11	15	112	113	-	89	502	502	-	-	1,333	411	-	-	-	81,311	2,746	-
2a.1.5.35	Main Steam	-	206	16	23	180	163	-	124	712	712	-	-	2,148	594	-	-	-	126,485	3,512	-
2a.1.5.36	Main Turbine	-	839	203	263	1,653	2,383	-	1,113	6,454	6,454	-	-	19,760	8,687	-	-	-	1,376,578	14,733	-
2a.1.5.37	Main Turbine - Insulated	-	178	17	27	212	183	-	128	745	745	-	-	2,530	667	-	-	-	146,839	3,069	-
2a.1.5.38	Miscellaneous	-	35	0	2	25	-	-	13	76	76	-	-	302	-	-	-	-	12,283	622	-
2a.1.5.39	Off Gas Recombiner	-	157	18	24	150	210	-	120	678	678	-	-	1,795	764	-	-	-	123,437	2,708	-
2a.1.5.40	Off Gas Recombiner - Insulated	-	320	18	20	114	195	-	151	818	818	-	-	1,366	709	-	-	-	102,395	5,385	-
2a.1.5.41	Post Accident Sampling	-	21	1	1	4	9	-	8	44	44	-	-	53	33	-	-	-	4,355	345	-
2a.1.5.42	Post Accident Sampling - Insulated	-	14	1	1	1	10	-	6	34	34	-	-	17	37	-	-	-	3,143	212	-
2a.1.5.43	RHR Service Water - Insulated - RCA	-	69	2	10	124	-	-	37	242	242	-	-	1,485	-	-	-	-	60,293	1,125	-
2a.1.5.44	RHR Service Water - RCA	-	3	0	0	3	-	-	1	8	8	-	-	35	-	-	-	-	1,410	57	-
2a.1.5.45	Reactor Feedwater Pump Seal	-	46	2	3	16	26	-	21	115	115	-	-	193	96	-	-	-	14,222	773	-
2a.1.5.46	Residual Heat Removal	320	209	162	134	536	1,653	-	742	3,755	3,755	-	-	6,406	6,012	-	-	-	658,423	4,135	-

Table E
Monticello Nuclear Generating Plant
DECON 100 YR Fuel Storage with Recasking Decommissioning Cost Estimate
(Thousands of 2014 Dollars)

Activity Index	Activity Description	Decon Cost	Removal Cost	Packaging Costs	Transport Costs	Off-Site Processing Costs	LLRW Disposal Costs	Other Costs	Total Contingency	Total Costs	NRC Lic. Term. Costs	Spent Fuel Management Costs	Site Restoration Costs	Processed Volume Cu. Feet	Burial Volumes				GTCC Cu. Feet	Burial /		Utility and Contractor Manhours
															Class A Cu. Feet	Class B Cu. Feet	Class C Cu. Feet	Processed Wt., Lbs.		Craft Manhours		
Disposal of Plant Systems (continued)																						
2a.1.5.47	Residual Heat Removal - Insulated	542	461	61	62	282	716	-	623	2,746	2,746	-	-	3,367	2,607	-	-	-	309,163	10,340	-	
2a.1.5.48	Rx Core Isolation Cooling	-	40	2	3	22	21	-	19	107	107	-	-	259	76	-	-	-	15,537	691	-	
2a.1.5.49	Rx Core Isolation Cooling - Insulated	-	89	5	5	24	54	-	41	218	218	-	-	288	198	-	-	-	24,804	1,479	-	
2a.1.5.50	Rx Recirculation	47	48	5	3	4	52	-	50	210	210	-	-	43	190	-	-	-	14,353	1,580	-	
2a.1.5.51	Snubbers	-	141	2	4	32	25	-	47	251	251	-	-	377	90	-	-	-	21,240	2,548	-	
2a.1.5.52	Standby Liquid Control - Insul - RCA	-	3	0	0	2	-	-	1	6	6	-	-	22	-	-	-	-	904	48	-	
2a.1.5.53	Standby Liquid Control - RCA	-	22	0	2	21	-	-	9	53	53	-	-	245	-	-	-	-	9,969	341	-	
2a.1.5.54	Stator Cooling - RCA	-	6	0	1	11	-	-	3	21	21	-	-	126	-	-	-	-	5,135	98	-	
2a.1.5.55	Traversing Incore Probe	0	3	0	0	0	2	-	1	6	6	-	-	1	5	-	-	-	390	51	-	
2a.1.5	Totals	909	6,814	882	1,164	8,170	9,278	-	5,964	33,181	33,161	-	20	97,654	33,808	-	-	-	6,201,492	119,943	-	
2a.1.6	Scaffolding in support of decommissioning	-	1,911	24	9	95	25	-	502	2,566	2,566	-	-	1,030	91	-	-	-	52,344	22,564	-	
2a.1	Subtotal Period 2a Activity Costs	1,483	22,596	20,878	5,575	13,035	34,496	619	33,975	132,658	132,638	-	20	141,552	53,571	1,481	1,010	-	10,526,940	253,155	2,478	
Period 2a Additional Costs																						
2a.2.1	Remedial Action Surveys	-	-	-	-	-	-	1,343	403	1,746	1,746	-	-	-	-	-	-	-	-	27,506	-	
2a.2	Subtotal Period 2a Additional Costs	-	-	-	-	-	-	1,343	403	1,746	1,746	-	-	-	-	-	-	-	-	27,506	-	
Period 2a Collateral Costs																						
2a.3.1	Process decommissioning water waste	84	-	55	139	-	239	-	128	645	645	-	-	-	538	-	-	-	32,290	105	-	
2a.3.2	Process decommissioning chemical flush waste	5	-	206	746	-	1,652	-	548	3,157	3,157	-	-	-	2,093	-	-	-	223,008	392	-	
2a.3.3	Small tool allowance	-	270	-	-	-	-	-	41	311	280	-	31	-	-	-	-	-	-	-	-	
2a.3.4	Spent Fuel Capital and Transfer	-	-	-	-	-	-	71	11	81	-	81	-	-	-	-	-	-	-	-	-	
2a.3.5	On-site survey and release of 0.0 tons clean metallic waste	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
2a.3	Subtotal Period 2a Collateral Costs	89	270	261	884	-	1,892	71	727	4,194	4,082	81	31	-	2,631	-	-	-	255,298	497	-	
Period 2a Period-Dependent Costs																						
2a.4.1	Decon supplies	71	-	-	-	-	-	-	18	89	89	-	-	-	-	-	-	-	-	-	-	
2a.4.2	Insurance	-	-	-	-	-	-	777	78	854	854	-	-	-	-	-	-	-	-	-	-	
2a.4.3	Property taxes	-	-	-	-	-	-	3,365	336	3,701	3,331	-	370	-	-	-	-	-	-	-	-	
2a.4.4	Health physics supplies	-	1,940	-	-	-	-	-	485	2,425	2,425	-	-	-	-	-	-	-	-	-	-	
2a.4.5	Heavy equipment rental	-	2,687	-	-	-	-	-	403	3,090	3,090	-	-	-	-	-	-	-	-	-	-	
2a.4.6	Disposal of DAW generated	-	-	112	39	-	424	-	123	699	699	-	-	-	5,394	-	-	-	107,886	176	-	
2a.4.7	Plant energy budget	-	-	-	-	-	-	4,438	666	5,103	5,103	-	-	-	-	-	-	-	-	-	-	
2a.4.8	NRC Fees	-	-	-	-	-	-	829	83	911	911	-	-	-	-	-	-	-	-	-	-	
2a.4.9	Emergency Planning Fees	-	-	-	-	-	-	3,399	340	3,739	-	3,739	-	-	-	-	-	-	-	-	-	
2a.4.10	Fixed Overhead	-	-	-	-	-	-	2,459	369	2,827	2,827	-	-	-	-	-	-	-	-	-	-	
2a.4.11	Spent Fuel Pool O&M	-	-	-	-	-	-	1,047	157	1,204	-	1,204	-	-	-	-	-	-	-	-	-	
2a.4.12	ISFSI Operating Costs	-	-	-	-	-	-	126	19	145	-	145	-	-	-	-	-	-	-	-	-	
2a.4.13	Railroad Track Maintenance	-	-	-	-	-	-	141	21	162	162	-	-	-	-	-	-	-	-	-	-	
2a.4.14	Security Staff Cost	-	-	-	-	-	-	6,002	900	6,902	6,902	-	-	-	-	-	-	-	-	-	174,570	
2a.4.15	DOC Staff Cost	-	-	-	-	-	-	15,225	2,284	17,509	17,509	-	-	-	-	-	-	-	-	-	209,760	
2a.4.16	Utility Staff Cost	-	-	-	-	-	-	21,262	3,189	24,451	24,451	-	-	-	-	-	-	-	-	-	390,540	
2a.4	Subtotal Period 2a Period-Dependent Costs	71	4,627	112	39	-	424	59,068	9,471	73,813	68,355	5,088	370	-	5,394	-	-	-	107,886	176	774,870	
2a.0	TOTAL PERIOD 2a COST	1,643	27,494	21,252	6,499	13,035	36,812	61,101	44,576	212,411	206,821	5,169	421	141,552	61,596	1,481	1,010	-	10,890,130	281,333	777,348	
PERIOD 2b - Site Decontamination																						
Period 2b Direct Decommissioning Activities																						
Disposal of Plant Systems																						
2b.1.1.1	ALARA/Radiological	-	15	0	0	3	3	-	5	27	27	-	-	35	10	-	-	-	2,083	277	-	
2b.1.1.2	Alternate N2 - RCA	-	13	0	1	8	-	-	5	27	27	-	-	93	-	-	-	-	3,765	185	-	
2b.1.1.3	Decontamination Projects	-	1	0	0	0	0	-	0	2	2	-	-	2	0	-	-	-	130	17	-	
2b.1.1.4	Electrical - Contaminated	-	366	5	17	200	25	-	131	744	744	-	-	2,389	90	-	-	-	102,957	6,325	-	
2b.1.1.5	Electrical - Decontaminated	-	2,195	36	156	1,953	-	-	869	5,208	5,208	-	-	23,344	-	-	-	-	948,013	37,107	-	
2b.1.1.6	Fire - RCA	-	84	1	4	51	-	-	29	169	169	-	-	614	-	-	-	-	24,917	1,324	-	
2b.1.1.7	HVAC Ductwork	-	263	6	19	223	28	-	110	649	649	-	-	2,665	100	-	-	-	114,856	4,111	-	
2b.1.1.8	HVAC/Chilled Water - RCA	-	267	4	18	230	-	-	104	624	624	-	-	2,752	-	-	-	-	111,779	3,985	-	
2b.1.1.9	Heating & Ventilation	-	401	14	44	503	62	-	199	1,224	1,224	-	-	6,018	227	-	-	-	259,372	7,101	-	
2b.1.1.10	Heating Boiler - Insulated - RCA	-	2	0	0	2	-	-	1	5	5	-	-	26	-	-	-	-	1,058	35	-	
2b.1.1.11	Liquid Radwaste	494	571	44	46	257	468	-	557	2,437	2,437	-	-	3,073	1,728	-	-	-	237,560	17,194	-	
2b.1.1.12	Makeup Demin - RCA	-	86	2	10	123	-	-	42	263	263	-	-	1,471	-	-	-	-	59,747	1,412	-	
2b.1.1.13	Non-Essential Diesel Generator - RCA	-	23	2	9	119	-	-	25	179	179	-	-	1,424	-	-	-	-	57,832	395	-	
2b.1.1.14	Off Gas Holdup	-	283	19	28	230	172	-	155	888	888	-	-	2,755	630	-	-	-	153,412	4,769	-	
2b.1.1.15	Primary Containment	-	378	40	64	519	413	-	289	1,703	1,703	-	-	6,201	1,506	-	-	-	351,391	6,454	-	

Monticello Nuclear Generating Plant
Decommissioning Cost Analysis

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Table E
Monticello Nuclear Generating Plant
DECON 100 YR Fuel Storage with Recasking Decommissioning Cost Estimate
(Thousands of 2014 Dollars)

Activity Index	Activity Description	Decon Cost	Removal Cost	Packaging Costs	Transport Costs	Off-Site	LLRW	Other Costs	Total Contingency	Total Costs	NRC	Spent Fuel	Site	Processed Volume Cu. Feet	Burial Volumes				Burial /	Craft Manhours	Utility and
						Processing Costs	Disposal Costs				Lic. Term. Costs	Management Costs	Restoration Costs		Class A Cu. Feet	Class B Cu. Feet	Class C Cu. Feet	GTCC Cu. Feet	Processed Wt., Lbs.		Contractor Manhours
Disposal of Plant Systems (continued)																					
2b.1.1.16	Process Radiation Monitors	-	38	2	2	12	14	-	15	83	83	-	-	142	52	-	-	-	9,195	649	-
2b.1.1.17	Rx Bldg Closed Clng Water - Insul - RCA	-	93	2	7	82	-	-	37	220	220	-	-	977	-	-	-	-	39,675	1,484	-
2b.1.1.18	Rx Bldg Closed Clng Water - RCA	-	152	11	47	593	-	-	135	938	938	-	-	7,093	-	-	-	-	288,031	2,489	-
2b.1.1.19	Rx Component Handling Equip	23	117	18	20	97	228	-	117	621	621	-	-	1,158	829	-	-	-	101,862	2,462	-
2b.1.1.20	Rx Pressure Vessel	23	39	5	4	6	63	-	39	181	181	-	-	75	230	-	-	-	18,281	1,051	-
2b.1.1.21	Rx Water Cleanup	145	220	18	12	11	202	-	184	793	793	-	-	130	737	-	-	-	54,051	5,736	-
2b.1.1.22	Secondary Containment	-	103	7	11	85	70	-	58	334	334	-	-	1,017	255	-	-	-	58,151	1,763	-
2b.1.1.23	Service & Seal Water - Insulated - RCA	-	99	2	8	99	-	-	41	249	249	-	-	1,180	-	-	-	-	47,917	1,565	-
2b.1.1.24	Service & Seal Water - RCA	-	131	3	12	151	-	-	58	355	355	-	-	1,809	-	-	-	-	73,453	2,016	-
2b.1.1.25	Service Air Blower - RCA	-	13	0	1	17	-	-	6	38	38	-	-	206	-	-	-	-	8,364	206	-
2b.1.1.26	Solid Radwaste	285	409	34	37	200	375	-	378	1,718	1,718	-	-	2,387	1,380	-	-	-	187,377	10,820	-
2b.1.1.27	Structures & Buildings	-	64	2	4	30	23	-	27	151	151	-	-	357	85	-	-	-	20,152	1,128	-
2b.1.1.28	Wells & Domestic Water	-	8	-	-	-	-	-	1	9	-	-	9	-	-	-	-	-	-	144	-
2b.1.1.29	Wells & Domestic Water - RCA	-	43	1	2	29	-	-	15	90	90	-	-	342	-	-	-	-	13,874	633	-
2b.1.1	Totals	971	6,479	280	584	5,834	2,147	-	3,632	19,926	19,917	-	9	69,735	7,859	-	-	-	3,349,255	122,835	-
2b.1.2	Scaffolding in support of decommissioning	-	2,389	29	11	119	31	-	628	3,208	3,208	-	-	1,287	114	-	-	-	65,430	28,205	-
Decontamination of Site Buildings																					
2b.1.3.1	Reactor Building	4,343	2,430	138	368	4,022	978	-	3,696	15,975	15,975	-	-	48,077	4,667	-	-	-	2,318,995	112,507	-
2b.1.3.2	Admin	91	5	0	2	-	13	-	50	161	161	-	-	-	79	-	-	-	6,840	1,599	-
2b.1.3.3	HPCI Room	24	24	0	2	10	12	-	23	96	96	-	-	118	70	-	-	-	10,760	789	-
2b.1.3.4	Hot Shop	14	4	0	1	-	9	-	11	39	39	-	-	-	56	-	-	-	4,860	286	-
2b.1.3.5	LLRW Storage & Shipping	49	21	1	5	3	39	-	41	159	159	-	-	31	237	-	-	-	21,708	1,126	-
2b.1.3.6	Offgas Stack	315	228	5	16	112	70	-	252	998	998	-	-	1,343	388	-	-	-	87,082	8,859	-
2b.1.3.7	Offgas Storage & Compressor	35	15	0	4	2	29	-	29	114	114	-	-	25	173	-	-	-	15,948	785	-
2b.1.3.8	Radwaste	103	53	2	12	14	83	-	90	357	357	-	-	172	501	-	-	-	49,943	2,501	-
2b.1.3.9	Radwaste Material Storage Warehouse	54	21	1	6	-	45	-	45	171	171	-	-	-	270	-	-	-	23,400	1,196	-
2b.1.3.10	Recombiner	23	21	1	4	17	21	-	25	111	111	-	-	199	121	-	-	-	18,405	695	-
2b.1.3.11	Turbine	601	304	10	72	107	489	-	526	2,109	2,109	-	-	1,283	2,912	-	-	-	303,150	14,432	-
2b.1.3.12	Turbine Building Addition	50	18	1	5	-	39	-	40	153	153	-	-	-	236	-	-	-	20,478	1,086	-
2b.1.3	Totals	5,701	3,143	159	498	4,287	1,828	-	4,827	20,443	20,443	-	-	51,247	9,710	-	-	-	2,881,569	145,859	-
2b.1	Subtotal Period 2b Activity Costs	6,673	12,012	467	1,093	10,240	4,006	-	9,087	43,578	43,568	-	9	122,269	17,682	-	-	-	6,296,255	296,899	-
Period 2b Additional Costs																					
2b.2.1	Remedial Action Surveys	-	-	-	-	-	-	2,259	678	2,936	2,936	-	-	-	-	-	-	-	-	46,242	-
2b.2.2	Operational Equipment	-	-	17	66	603	-	-	102	788	788	-	-	11,710	-	-	-	-	292,750	32	-
2b.2	Subtotal Period 2b Additional Costs	-	-	17	66	603	-	2,259	780	3,724	3,724	-	-	11,710	-	-	-	-	292,750	46,274	-
Period 2b Collateral Costs																					
2b.3.1	Process decommissioning water waste	172	-	115	291	-	501	-	266	1,345	1,345	-	-	-	1,127	-	-	-	67,647	220	-
2b.3.2	Process decommissioning chemical flush waste	1	-	41	147	-	326	-	108	623	623	-	-	-	413	-	-	-	43,978	77	-
2b.3.3	Small tool allowance	-	286	-	-	-	-	-	43	329	329	-	-	-	-	-	-	-	-	-	-
2b.3.4	Spent Fuel Capital and Transfer	-	-	-	-	-	-	29,013	4,352	33,365	-	33,365	-	-	-	-	-	-	-	-	-
2b.3.5	On-site survey and release of 0.0 tons clean metallic waste	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2b.3	Subtotal Period 2b Collateral Costs	173	286	156	438	-	827	29,013	4,769	35,662	2,297	33,365	-	-	1,540	-	-	-	111,625	297	-
Period 2b Period-Dependent Costs																					
2b.4.1	Decon supplies	1,063	-	-	-	-	-	-	266	1,328	1,328	-	-	-	-	-	-	-	-	-	-
2b.4.2	Insurance	-	-	-	-	-	-	1,306	131	1,437	1,437	-	-	-	-	-	-	-	-	-	-
2b.4.3	Property taxes	-	-	-	-	-	-	5,191	519	5,710	5,710	-	-	-	-	-	-	-	-	-	-
2b.4.4	Health physics supplies	-	2,659	-	-	-	-	-	665	3,324	3,324	-	-	-	-	-	-	-	-	-	-
2b.4.5	Heavy equipment rental	-	4,472	-	-	-	-	-	671	5,143	5,143	-	-	-	-	-	-	-	-	-	-
2b.4.6	Disposal of DAW generated	-	-	121	42	-	456	-	132	752	752	-	-	-	5,805	-	-	-	116,095	189	-
2b.4.7	Plant energy budget	-	-	-	-	-	-	5,890	883	6,773	6,773	-	-	-	-	-	-	-	-	-	-
2b.4.8	NRC Fees	-	-	-	-	-	-	1,393	139	1,532	1,532	-	-	-	-	-	-	-	-	-	-
2b.4.9	Emergency Planning Fees	-	-	-	-	-	-	5,714	571	6,285	-	6,285	-	-	-	-	-	-	-	-	-
2b.4.10	Fixed Overhead	-	-	-	-	-	-	4,133	620	4,753	4,753	-	-	-	-	-	-	-	-	-	-
2b.4.11	Spent Fuel Pool O&M	-	-	-	-	-	-	1,760	264	2,024	-	2,024	-	-	-	-	-	-	-	-	-
2b.4.12	Liquid Radwaste Processing Equipment/Services	-	-	-	-	-	-	446	67	513	513	-	-	-	-	-	-	-	-	-	-
2b.4.13	ISFSI Operating Costs	-	-	-	-	-	-	212	32	244	-	244	-	-	-	-	-	-	-	-	-
2b.4.14	Railroad Track Maintenance	-	-	-	-	-	-	237	36	273	273	-	-	-	-	-	-	-	-	-	-
2b.4.15	Security Staff Cost	-	-	-	-	-	-	10,090	1,514	11,604	11,604	-	-	-	-	-	-	-	-	-	293,480
2b.4.16	DOC Staff Cost	-	-	-	-	-	-	24,752	3,713	28,465	28,465	-	-	-	-	-	-	-	-	-	338,720
2b.4.17	Utility Staff Cost	-	-	-	-	-	-	34,504	5,176	39,680	39,680	-	-	-	-	-	-	-	-	-	628,720
2b.4	Subtotal Period 2b Period-Dependent Costs	1,063	7,131	121	42	-	456	95,629	15,398	119,840	111,287	8,553	-	-	5,805	-	-	-	116,095	189	1,260,920
2b.0	TOTAL PERIOD 2b COST	7,908	19,430	762	1,639	10,843	5,289	126,900	30,033	202,804	160,877	41,918	9	133,979	25,027	-	-	-	6,816,725	343,660	1,260,920

Monticello Nuclear Generating Plant
Decommissioning Cost Analysis

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Table E
Monticello Nuclear Generating Plant
DECON 100 YR Fuel Storage with Recasking Decommissioning Cost Estimate
(Thousands of 2014 Dollars)

Activity Index	Activity Description	Decon Cost	Removal Cost	Packaging Costs	Transport Costs	Off-Site Processing Costs	LLRW Disposal Costs	Other Costs	Total Contingency	Total Costs	NRC Lic. Term. Costs	Spent Fuel Management Costs	Site Restoration Costs	Processed Volume Cu. Feet	Burial Volumes				Burial /		Utility and Contractor Manhours
															Class A Cu. Feet	Class B Cu. Feet	Class C Cu. Feet	GTCC Cu. Feet	Processed Wt., Lbs.	Craft Manhours	
PERIOD 2c - Spent fuel delay prior to SFP decon																					
Period 2c Direct Decommissioning Activities																					
Period 2c Collateral Costs																					
2c.3.1	Spent Fuel Capital and Transfer	-	-	-	-	-	-	33,471	5,021	38,492	-	38,492	-	-	-	-	-	-	-	-	-
2c.3	Subtotal Period 2c Collateral Costs	-	-	-	-	-	-	33,471	5,021	38,492	-	38,492	-	-	-	-	-	-	-	-	-
Period 2c Period-Dependent Costs																					
2c.4.1	Insurance	-	-	-	-	-	-	5,848	585	6,432	6,432	-	-	-	-	-	-	-	-	-	-
2c.4.2	Property taxes	-	-	-	-	-	-	15,696	1,570	17,265	17,265	-	-	-	-	-	-	-	-	-	-
2c.4.3	Health physics supplies	-	1,958	-	-	-	-	-	490	2,448	2,448	-	-	-	-	-	-	-	-	-	-
2c.4.4	Disposal of DAW generated	-	-	86	30	-	323	-	94	532	532	-	-	-	4,110	-	-	-	82,199	134	-
2c.4.5	Plant energy budget	-	-	-	-	-	-	7,033	1,055	8,088	8,088	-	-	-	-	-	-	-	-	-	-
2c.4.6	NRC Fees	-	-	-	-	-	-	2,883	288	3,171	3,171	-	-	-	-	-	-	-	-	-	-
2c.4.7	Emergency Planning Fees	-	-	-	-	-	-	25,586	2,559	28,145	-	28,145	-	-	-	-	-	-	-	-	-
2c.4.8	Fixed Overhead	-	-	-	-	-	-	18,508	2,776	21,285	21,285	-	-	-	-	-	-	-	-	-	-
2c.4.9	Spent Fuel Pool O&M	-	-	-	-	-	-	7,880	1,182	9,062	-	9,062	-	-	-	-	-	-	-	-	-
2c.4.10	Liquid Radwaste Processing Equipment/Services	-	-	-	-	-	-	399	60	459	459	-	-	-	-	-	-	-	-	-	-
2c.4.11	ISFSI Operating Costs	-	-	-	-	-	-	951	143	1,094	-	1,094	-	-	-	-	-	-	-	-	-
2c.4.12	Railroad Track Maintenance	-	-	-	-	-	-	1,063	159	1,222	1,222	-	-	-	-	-	-	-	-	-	-
2c.4.13	Security Staff Cost	-	-	-	-	-	-	38,571	5,786	44,356	22,178	22,178	-	-	-	-	-	-	-	-	1,106,383
2c.4.14	Utility Staff Cost	-	-	-	-	-	-	44,188	6,628	50,817	25,408	25,408	-	-	-	-	-	-	-	-	820,697
2c.4	Subtotal Period 2c Period-Dependent Costs	-	1,958	86	30	-	323	168,606	23,374	194,376	108,489	85,887	-	-	4,110	-	-	-	82,199	134	1,927,080
2c.0	TOTAL PERIOD 2c COST	-	1,958	86	30	-	323	202,077	28,394	232,868	108,489	124,380	-	-	4,110	-	-	-	82,199	134	1,927,080
PERIOD 2d - Decontamination Following Wet Fuel Storage																					
Period 2d Direct Decommissioning Activities																					
2d.1.1	Remove spent fuel racks	557	49	108	116	-	2,099	-	844	3,772	3,772	-	-	-	7,653	-	-	-	505,842	906	-
Disposal of Plant Systems																					
2d.1.2.1	Cranes/Heavy Loads/Rigging - RCA	-	3	0	1	9	-	-	2	14	14	-	-	103	-	-	-	-	4,184	48	-
2d.1.2.2	Electrical - Contaminated Fuel Pool	-	38	1	2	20	2	-	14	77	77	-	-	240	9	-	-	-	10,357	665	-
2d.1.2.3	Electrical - Decontam. Fuel Pool Area	-	242	4	16	206	-	-	94	562	562	-	-	2,457	-	-	-	-	99,783	4,090	-
2d.1.2.4	Fire - RCA - Fuel Pool Area	-	9	0	0	5	-	-	3	18	18	-	-	62	-	-	-	-	2,499	143	-
2d.1.2.5	Fuel Pool Cooling & Cleanup	210	354	33	28	99	368	-	308	1,399	1,399	-	-	1,179	1,341	-	-	-	136,502	8,380	-
2d.1.2.6	Fuel Pool Cooling & Cleanup - Insulated	23	34	3	2	6	32	-	30	129	129	-	-	67	117	-	-	-	10,447	848	-
2d.1.2.7	HVAC Ductwork - Fuel Pool Area	-	29	1	2	25	3	-	12	72	72	-	-	296	11	-	-	-	12,762	457	-
2d.1.2.8	HVAC/Chilled Water - RCA Fuel Pool Area	-	27	0	1	19	-	-	10	57	57	-	-	223	-	-	-	-	9,072	397	-
2d.1.2.9	Instrument & Service Air-RCA-Fuel Pool	-	24	0	2	22	-	-	10	58	58	-	-	267	-	-	-	-	10,841	357	-
2d.1.2	Totals	233	760	42	55	409	405	-	482	2,386	2,386	-	-	4,894	1,479	-	-	-	296,447	15,385	-
Decontamination of Site Buildings																					
2d.1.3.1	Reactor (Post Fuel)	791	2,225	89	642	165	8,016	-	3,086	15,012	15,012	-	-	1,969	43,028	-	-	-	2,677,024	45,625	-
2d.1.3	Totals	791	2,225	89	642	165	8,016	-	3,086	15,012	15,012	-	-	1,969	43,028	-	-	-	2,677,024	45,625	-
2d.1.4	Scaffolding in support of decommissioning	-	478	6	2	24	6	-	126	642	642	-	-	257	23	-	-	-	13,086	5,641	-
2d.1	Subtotal Period 2d Activity Costs	1,581	3,511	245	815	598	10,527	-	4,536	21,813	21,813	-	-	7,120	52,182	-	-	-	3,492,399	67,557	-
Period 2d Additional Costs																					
2d.2.1	License Termination Survey Planning	-	-	-	-	-	-	1,104	331	1,435	1,435	-	-	-	-	-	-	-	-	-	12,480
2d.2.2	Remedial Action Surveys	-	-	-	-	-	-	765	229	994	994	-	-	-	-	-	-	-	-	15,661	-
2d.2	Subtotal Period 2d Additional Costs	-	-	-	-	-	-	1,868	561	2,429	2,429	-	-	-	-	-	-	-	-	15,661	12,480
Period 2d Collateral Costs																					
2d.3.1	Process decommissioning water waste	26	-	21	52	-	90	-	45	235	235	-	-	-	204	-	-	-	12,210	40	-
2d.3.2	Process decommissioning chemical flush waste	1	-	25	89	-	197	-	65	376	376	-	-	-	249	-	-	-	26,553	47	-
2d.3.3	Small tool allowance	-	74	-	-	-	-	-	11	86	86	-	-	-	-	-	-	-	-	-	-
2d.3.4	Decommissioning Equipment Disposition	-	-	137	62	556	145	-	143	1,043	1,043	-	-	6,000	529	-	-	-	304,968	88	-
2d.3.5	Spent Fuel Capital and Transfer	-	-	-	-	-	-	11,181	1,677	12,859	-	12,859	-	-	-	-	-	-	-	-	-
2d.3	Subtotal Period 2d Collateral Costs	26	74	182	203	556	432	11,181	1,942	14,598	1,739	12,859	-	6,000	982	-	-	-	343,731	174	-

Monticello Nuclear Generating Plant
Decommissioning Cost Analysis

Table E
Monticello Nuclear Generating Plant
DECON 100 YR Fuel Storage with Recasking Decommissioning Cost Estimate
(Thousands of 2014 Dollars)

Activity Index	Activity Description	Decon Cost	Removal Cost	Packaging Costs	Transport Costs	Off-Site Processing Costs	LLRW Disposal Costs	Other Costs	Total Contingency	Total Costs	NRC Lic. Term. Costs	Spent Fuel Management Costs	Site Restoration Costs	Processed Volume Cu. Feet	Burial Volumes				Burial / Processed Wt., Lbs.	Craft Manhours	Utility and Contractor Manhours
															Class A Cu. Feet	Class B Cu. Feet	Class C Cu. Feet	GTCC Cu. Feet			
Period 2d Period-Dependent Costs																					
2d.4.1	Decon supplies	169	-	-	-	-	-	-	42	212	212	-	-	-	-	-	-	-	-	-	-
2d.4.2	Insurance	-	-	-	-	-	-	442	44	487	487	-	-	-	-	-	-	-	-	-	-
2d.4.3	Property taxes	-	-	-	-	-	-	686	69	755	755	-	-	-	-	-	-	-	-	-	-
2d.4.4	Health physics supplies	-	714	-	-	-	-	-	178	892	892	-	-	-	-	-	-	-	-	-	-
2d.4.5	Heavy equipment rental	-	1,515	-	-	-	-	-	227	1,742	1,742	-	-	-	-	-	-	-	-	-	-
2d.4.6	Disposal of DAW generated	-	-	42	15	-	160	-	46	263	263	-	-	-	2,030	-	-	-	40,600	66	-
2d.4.7	Plant energy budget	-	-	-	-	-	-	1,064	160	1,223	1,223	-	-	-	-	-	-	-	-	-	-
2d.4.8	NRC Fees	-	-	-	-	-	-	401	40	441	441	-	-	-	-	-	-	-	-	-	-
2d.4.9	Emergency Planning Fees	-	-	-	-	-	-	1,935	194	2,129	-	2,129	-	-	-	-	-	-	-	-	-
2d.4.10	Fixed Overhead	-	-	-	-	-	-	1,400	210	1,610	1,610	-	-	-	-	-	-	-	-	-	-
2d.4.11	Liquid Radwaste Processing Equipment/Services	-	-	-	-	-	-	302	45	347	347	-	-	-	-	-	-	-	-	-	-
2d.4.12	ISFSI Operating Costs	-	-	-	-	-	-	72	11	83	-	83	-	-	-	-	-	-	-	-	-
2d.4.13	Railroad Track Maintenance	-	-	-	-	-	-	80	12	92	92	-	-	-	-	-	-	-	-	-	-
2d.4.14	Security Staff Cost	-	-	-	-	-	-	1,917	288	2,205	2,205	-	-	-	-	-	-	-	-	-	52,250
2d.4.15	DOC Staff Cost	-	-	-	-	-	-	5,802	870	6,672	6,672	-	-	-	-	-	-	-	-	-	78,571
2d.4.16	Utility Staff Cost	-	-	-	-	-	-	8,686	1,303	9,989	9,989	-	-	-	-	-	-	-	-	-	150,071
2d.4	Subtotal Period 2d Period-Dependent Costs	169	2,229	42	15	-	160	22,788	3,739	29,142	26,931	2,211	-	-	2,030	-	-	-	40,600	66	280,893
2d.0	TOTAL PERIOD 2d COST	1,777	5,814	469	1,033	1,154	11,118	35,838	10,778	67,982	52,912	15,070	-	13,120	55,194	-	-	-	3,876,730	83,458	293,373
PERIOD 2f - License Termination																					
Period 2f Direct Decommissioning Activities																					
2f.1.1	ORISE confirmatory survey	-	-	-	-	-	-	163	49	212	212	-	-	-	-	-	-	-	-	-	-
2f.1.2	Terminate license	-	-	-	-	-	-	-	-	a	-	-	-	-	-	-	-	-	-	-	-
2f.1	Subtotal Period 2f Activity Costs	-	-	-	-	-	-	163	49	212	212	-	-	-	-	-	-	-	-	-	-
Period 2f Additional Costs																					
2f.2.1	License Termination Survey	-	-	-	-	-	-	5,936	1,781	7,717	7,717	-	-	-	-	-	-	-	-	96,197	6,240
2f.2	Subtotal Period 2f Additional Costs	-	-	-	-	-	-	5,936	1,781	7,717	7,717	-	-	-	-	-	-	-	-	96,197	6,240
Period 2f Collateral Costs																					
2f.3.1	DOC staff relocation expenses	-	-	-	-	-	-	1,708	256	1,964	1,964	-	-	-	-	-	-	-	-	-	-
2f.3.2	Spent Fuel Capital and Transfer	-	-	-	-	-	-	40	6	46	-	46	-	-	-	-	-	-	-	-	-
2f.3	Subtotal Period 2f Collateral Costs	-	-	-	-	-	-	1,748	262	2,010	1,964	46	-	-	-	-	-	-	-	-	-
Period 2f Period-Dependent Costs																					
2f.4.1	Insurance	-	-	-	-	-	-	415	42	457	457	-	-	-	-	-	-	-	-	-	-
2f.4.2	Property taxes	-	-	-	-	-	-	624	62	686	686	-	-	-	-	-	-	-	-	-	-
2f.4.3	Health physics supplies	-	568	-	-	-	-	-	142	710	710	-	-	-	-	-	-	-	-	-	-
2f.4.4	Disposal of DAW generated	-	-	7	3	-	28	-	8	46	46	-	-	-	355	-	-	-	7,097	12	-
2f.4.5	Plant energy budget	-	-	-	-	-	-	532	80	612	612	-	-	-	-	-	-	-	-	-	-
2f.4.6	NRC Fees	-	-	-	-	-	-	455	46	501	501	-	-	-	-	-	-	-	-	-	-
2f.4.7	Emergency Planning Fees	-	-	-	-	-	-	241	24	265	-	265	-	-	-	-	-	-	-	-	-
2f.4.8	Fixed Overhead	-	-	-	-	-	-	1,400	210	1,610	1,610	-	-	-	-	-	-	-	-	-	-
2f.4.9	ISFSI Operating Costs	-	-	-	-	-	-	72	11	83	-	83	-	-	-	-	-	-	-	-	-
2f.4.10	Railroad Track Maintenance	-	-	-	-	-	-	80	12	92	92	-	-	-	-	-	-	-	-	-	-
2f.4.11	Security Staff Cost	-	-	-	-	-	-	1,880	282	2,162	2,162	-	-	-	-	-	-	-	-	-	51,071
2f.4.12	DOC Staff Cost	-	-	-	-	-	-	4,394	659	5,053	5,053	-	-	-	-	-	-	-	-	-	57,357
2f.4.13	Utility Staff Cost	-	-	-	-	-	-	4,918	738	5,656	5,656	-	-	-	-	-	-	-	-	-	80,929
2f.4	Subtotal Period 2f Period-Dependent Costs	-	568	7	3	-	28	15,011	2,315	17,932	17,584	348	-	-	355	-	-	-	7,097	12	189,357
2f.0	TOTAL PERIOD 2f COST	-	568	7	3	-	28	22,858	4,407	27,871	27,477	394	-	-	355	-	-	-	7,097	96,208	195,597
PERIOD 2 TOTALS		11,328	55,263	22,575	9,203	25,033	53,570	448,775	118,189	743,936	556,575	186,931	431	288,652	146,282	1,481	1,010	-	21,672,880	804,794	4,454,318

Monticello Nuclear Generating Plant
Decommissioning Cost Analysis

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Table E
Monticello Nuclear Generating Plant
DECON 100 YR Fuel Storage with Recasking Decommissioning Cost Estimate
(Thousands of 2014 Dollars)

Activity Index	Activity Description	Decon Cost	Removal Cost	Packaging Costs	Transport Costs	Off-Site Processing Costs	LLRW Disposal Costs	Other Costs	Total Contingency	Total Costs	NRC Lic. Term. Costs	Spent Fuel Management Costs	Site Restoration Costs	Processed Volume Cu. Feet	Burial Volumes				Burial / Processed Wt., Lbs.	Craft Manhours	Utility and Contractor Manhours
															Class A Cu. Feet	Class B Cu. Feet	Class C Cu. Feet	GTCC Cu. Feet			
PERIOD 3b - Site Restoration																					
Period 3b Direct Decommissioning Activities																					
Demolition of Remaining Site Buildings																					
3b.1.1.1	Reactor Building	-	3,541	-	-	-	-	-	531	4,073	-	-	4,073	-	-	-	-	-	-	36,752	-
3b.1.1.2	Condensate Tanks Foundation	-	19	-	-	-	-	-	3	22	-	-	22	-	-	-	-	-	-	219	-
3b.1.1.3	Discharge Retention Basin	-	9	-	-	-	-	-	1	10	-	-	10	-	-	-	-	-	-	110	-
3b.1.1.4	HPCI Room	-	44	-	-	-	-	-	7	50	-	-	50	-	-	-	-	-	-	401	-
3b.1.1.5	Hot Shop	-	21	-	-	-	-	-	3	24	-	-	24	-	-	-	-	-	-	298	-
3b.1.1.6	Hydrogen & Oxygen Storage	-	2	-	-	-	-	-	0	2	-	-	2	-	-	-	-	-	-	21	-
3b.1.1.7	LLRW Storage & Shipping	-	140	-	-	-	-	-	21	161	-	-	161	-	-	-	-	-	-	1,794	-
3b.1.1.8	MSIV	-	4	-	-	-	-	-	1	5	-	-	5	-	-	-	-	-	-	59	-
3b.1.1.9	Offgas Stack	-	232	-	-	-	-	-	35	267	-	-	267	-	-	-	-	-	-	2,668	-
3b.1.1.10	Offgas Storage & Compressor	-	88	-	-	-	-	-	13	101	-	-	101	-	-	-	-	-	-	963	-
3b.1.1.11	Radwaste	-	482	-	-	-	-	-	72	554	-	-	554	-	-	-	-	-	-	5,196	-
3b.1.1.12	Recombiner	-	258	-	-	-	-	-	39	297	-	-	297	-	-	-	-	-	-	2,490	-
3b.1.1.13	Security Barrier	-	362	-	-	-	-	-	54	416	-	-	416	-	-	-	-	-	-	4,083	-
3b.1.1.14	Tank Farm	-	10	-	-	-	-	-	1	11	-	-	11	-	-	-	-	-	-	121	-
3b.1.1.15	Turbine	-	1,514	-	-	-	-	-	227	1,741	-	-	1,741	-	-	-	-	-	-	18,764	-
3b.1.1.16	Turbine Building Addition	-	67	-	-	-	-	-	10	77	-	-	77	-	-	-	-	-	-	971	-
3b.1.1.17	Turbine Pedestal	-	415	-	-	-	-	-	62	478	-	-	478	-	-	-	-	-	-	3,762	-
3b.1.1	Totals	-	7,207	-	-	-	-	-	1,081	8,288	-	-	8,288	-	-	-	-	-	-	78,674	-
Site Closeout Activities																					
3b.1.2	BackFill Site	-	302	-	-	-	-	-	45	347	-	-	347	-	-	-	-	-	-	542	-
3b.1.3	Grade & landscape site	-	864	-	-	-	-	-	130	994	-	-	994	-	-	-	-	-	-	1,841	-
3b.1.4	Final report to NRC	-	-	-	-	-	-	177	27	204	204	-	-	-	-	-	-	-	-	-	1,560
3b.1	Subtotal Period 3b Activity Costs	-	8,374	-	-	-	-	177	1,283	9,833	204	-	9,630	-	-	-	-	-	-	81,057	1,560
Period 3b Additional Costs																					
3b.2.1	Concrete Crushing	-	292	-	-	-	-	9	45	347	-	-	347	-	-	-	-	-	-	1,387	-
3b.2.2	Excavation of Underground Services	-	1,402	-	-	-	-	705	316	2,424	-	-	2,424	-	-	-	-	-	-	13,475	-
3b.2.3	Intake Structure cofferdam	-	285	-	-	-	-	-	43	328	-	-	328	-	-	-	-	-	-	2,540	-
3b.2	Subtotal Period 3b Additional Costs	-	1,980	-	-	-	-	715	404	3,099	-	-	3,099	-	-	-	-	-	-	17,402	-
Period 3b Collateral Costs																					
3b.3.1	Small tool allowance	-	91	-	-	-	-	-	14	105	-	-	105	-	-	-	-	-	-	-	-
3b.3.2	Spent Fuel Capital and Transfer	-	-	-	-	-	-	2,231	335	2,566	-	2,566	-	-	-	-	-	-	-	-	-
3b.3.3	Railroad Track Maintenance SR	-	-	-	-	-	-	185	28	213	-	-	213	-	-	-	-	-	-	-	-
3b.3	Subtotal Period 3b Collateral Costs	-	91	-	-	-	-	2,416	376	2,883	-	2,566	317	-	-	-	-	-	-	-	-
Period 3b Period-Dependent Costs																					
3b.4.1	Insurance	-	-	-	-	-	-	956	96	1,052	-	1,052	-	-	-	-	-	-	-	-	-
3b.4.2	Property taxes	-	-	-	-	-	-	1,159	116	1,274	(0)	1,160	115	-	-	-	-	-	-	-	-
3b.4.3	Heavy equipment rental	-	4,953	-	-	-	-	-	743	5,696	-	-	5,696	-	-	-	-	-	-	-	-
3b.4.4	Plant energy budget	-	-	-	-	-	-	612	92	704	-	-	704	-	-	-	-	-	-	-	-
3b.4.5	NRC ISFSI Fees	-	-	-	-	-	-	440	44	484	-	484	-	-	-	-	-	-	-	-	-
3b.4.6	Emergency Planning Fees	-	-	-	-	-	-	555	55	610	-	610	-	-	-	-	-	-	-	-	-
3b.4.7	ISFSI Operating Costs	-	-	-	-	-	-	166	25	190	-	190	-	-	-	-	-	-	-	-	-
3b.4.8	Fixed Overhead SR	-	-	-	-	-	-	873	131	1,004	-	-	1,004	-	-	-	-	-	-	-	-
3b.4.9	Security Staff Cost	-	-	-	-	-	-	4,327	649	4,976	0	4,229	746	-	-	-	-	-	-	-	117,557
3b.4.10	DOC Staff Cost	-	-	-	-	-	-	9,599	1,440	11,039	-	-	11,039	-	-	-	-	-	-	-	122,983
3b.4.11	Utility Staff Cost	-	-	-	-	-	-	6,284	943	7,226	0	1,518	5,709	-	-	-	-	-	-	-	98,567
3b.4	Subtotal Period 3b Period-Dependent Costs	-	4,953	-	-	-	-	24,970	4,333	34,256	0	9,243	25,013	-	-	-	-	-	-	-	339,107
3b.0	TOTAL PERIOD 3b COST	-	15,397	-	-	-	-	28,278	6,396	50,071	204	11,809	38,059	-	-	-	-	-	-	98,459	340,667
PERIOD 3c - Fuel Storage Operations/Shipping																					
Period 3c Direct Decommissioning Activities																					
Period 3c Additional Costs																					
3c.2.1	ISFSI Disposition of Original MPC Canisters	-	-	-	614	-	8,229	-	2,119	10,962	-	10,962	-	-	26,624	-	-	-	2,662,443	-	-
3c.2	Subtotal Period 3c Additional Costs	-	-	-	614	-	8,229	-	2,119	10,962	-	10,962	-	-	26,624	-	-	-	2,662,443	-	-

Monticello Nuclear Generating Plant
Decommissioning Cost Analysis

Table E
Monticello Nuclear Generating Plant
DECON 100 YR Fuel Storage with Recasking Decommissioning Cost Estimate
(Thousands of 2014 Dollars)

Activity Index	Activity Description	Decon Cost	Removal Cost	Packaging Costs	Transport Costs	Off-Site Processing Costs	LLRW Disposal Costs	Other Costs	Total Contingency	Total Costs	NRC Lic. Term. Costs	Spent Fuel Management Costs	Site Restoration Costs	Processed Volume Cu. Feet	Burial Volumes				Burial / Processed Wt., Lbs.	Craft Manhours	Utility and Contractor Manhours
															Class A Cu. Feet	Class B Cu. Feet	Class C Cu. Feet	GTCC Cu. Feet			
Period 3c Collateral Costs																					
3c.3.1	Spent Fuel Capital and Transfer	-	-	-	-	-	-	424,141	63,621	487,762	-	487,762	-	-	-	-	-	-	-	-	-
3c.3	Subtotal Period 3c Collateral Costs	-	-	-	-	-	-	424,141	63,621	487,762	-	487,762	-	-	-	-	-	-	-	-	-
Period 3c Period-Dependent Costs																					
3c.4.1	Insurance	-	-	-	-	-	-	37,552	3,755	41,308	-	41,308	-	-	-	-	-	-	-	-	-
3c.4.2	Property taxes	-	-	-	-	-	-	102,714	10,271	112,985	-	112,985	-	-	-	-	-	-	-	-	-
3c.4.3	Plant energy budget	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
3c.4.4	NRC ISFSI Fees	-	-	-	-	-	-	17,281	1,728	19,009	-	19,009	-	-	-	-	-	-	-	-	-
3c.4.5	Emergency Planning Fees	-	-	-	-	-	-	21,799	2,180	23,979	-	23,979	-	-	-	-	-	-	-	-	-
3c.4.6	Fixed Overhead	-	-	-	-	-	-	34,286	5,143	39,429	-	39,429	-	-	-	-	-	-	-	-	-
3c.4.7	ISFSI Operating Costs	-	-	-	-	-	-	6,504	976	7,480	-	7,480	-	-	-	-	-	-	-	-	-
3c.4.8	Security Staff Cost	-	-	-	-	-	-	145,090	21,763	166,853	-	166,853	-	-	-	-	-	-	-	-	3,836,160
3c.4.9	DOC Staff Cost	-	-	-	-	-	-	13,601	2,040	15,641	-	15,641	-	-	-	-	-	-	-	-	142,080
3c.4.10	Utility Staff Cost	-	-	-	-	-	-	98,660	14,799	113,459	-	113,459	-	-	-	-	-	-	-	-	1,882,560
3c.4	Subtotal Period 3c Period-Dependent Costs	-	-	-	-	-	-	477,487	62,656	540,142	-	540,142	-	-	-	-	-	-	-	-	5,860,800
3c.0	TOTAL PERIOD 3c COST	-	-	-	614	-	8,229	901,628	128,396	1,038,867	-	1,038,867	-	-	26,624	-	-	-	2,662,443	-	5,860,800
PERIOD 3d - GTCC shipping																					
Period 3d Direct Decommissioning Activities																					
Nuclear Steam Supply System Removal																					
3d.1.1.1	Vessel & Internals GTCC Disposal	-	-	1,462	-	-	6,760	-	1,380	9,602	9,602	-	-	-	-	-	-	1,785	346,570	-	-
3d.1.1	Totals	-	-	1,462	-	-	6,760	-	1,380	9,602	9,602	-	-	-	-	-	-	1,785	346,570	-	-
3d.1	Subtotal Period 3d Activity Costs	-	-	1,462	-	-	6,760	-	1,380	9,602	9,602	-	-	-	-	-	-	1,785	346,570	-	-
Period 3d Collateral Costs																					
3d.3.1	Spent Fuel Capital and Transfer	-	-	-	-	-	-	21,730	3,260	24,990	-	24,990	-	-	-	-	-	-	-	-	-
3d.3	Subtotal Period 3d Collateral Costs	-	-	-	-	-	-	21,730	3,260	24,990	-	24,990	-	-	-	-	-	-	-	-	-
Period 3d Period-Dependent Costs																					
3d.4.1	Insurance	-	-	-	-	-	-	7,722	772	8,494	-	8,494	-	-	-	-	-	-	-	-	-
3d.4.2	Property taxes	-	-	-	-	-	-	8,556	856	9,411	-	9,411	-	-	-	-	-	-	-	-	-
3d.4.3	Plant energy budget	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
3d.4.4	NRC ISFSI Fees	-	-	-	-	-	-	5,089	509	5,597	-	5,597	-	-	-	-	-	-	-	-	-
3d.4.5	Emergency Planning Fees	-	-	-	-	-	-	4,483	448	4,931	-	4,931	-	-	-	-	-	-	-	-	-
3d.4.6	Fixed Overhead	-	-	-	-	-	-	7,051	1,058	8,108	-	8,108	-	-	-	-	-	-	-	-	-
3d.4.7	ISFSI Operating Costs	-	-	-	-	-	-	1,338	201	1,538	-	1,538	-	-	-	-	-	-	-	-	-
3d.4.8	Railroad Track Maintenance	-	-	-	-	-	-	1,777	267	2,044	-	2,044	-	-	-	-	-	-	-	-	-
3d.4.9	Security Staff Cost	-	-	-	-	-	-	29,836	4,475	34,311	-	34,311	-	-	-	-	-	-	-	-	788,863
3d.4.10	Utility Staff Cost	-	-	-	-	-	-	10,727	1,609	12,336	-	12,336	-	-	-	-	-	-	-	-	197,216
3d.4	Subtotal Period 3d Period-Dependent Costs	-	-	-	-	-	-	76,577	10,194	86,772	-	86,772	-	-	-	-	-	-	-	-	986,079
3d.0	TOTAL PERIOD 3d COST	-	-	1,462	-	-	6,760	98,308	14,833	121,363	9,602	111,761	-	-	-	-	-	1,785	346,570	-	986,079
PERIOD 3e - ISFSI Decontamination																					
Period 3e Direct Decommissioning Activities																					
Period 3e Additional Costs																					
3e.2.1	Decommissioning of ISFSI	28	196	7	361	-	2,758	1,977	1,332	6,658	6,658	-	-	-	15,473	-	-	-	1,669,366	12,625	1,872
3e.2	Subtotal Period 3e Additional Costs	28	196	7	361	-	2,758	1,977	1,332	6,658	6,658	-	-	-	15,473	-	-	-	1,669,366	12,625	1,872
Period 3e Collateral Costs																					
3e.3	Subtotal Period 3e Collateral Costs	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Period 3e Period-Dependent Costs																					
3e.4.1	Insurance	-	-	-	-	-	-	84	21	104	104	-	-	-	-	-	-	-	-	-	-
3e.4.2	Property taxes	-	-	-	-	-	-	203	51	253	253	-	-	-	-	-	-	-	-	-	-
3e.4.3	Plant energy budget	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
3e.4.4	Fixed Overhead	-	-	-	-	-	-	167	42	209	209	-	-	-	-	-	-	-	-	-	-
3e.4.5	Security Staff Cost	-	-	-	-	-	-	130	32	162	162	-	-	-	-	-	-	-	-	-	5,013
3e.4.6	Utility Staff Cost	-	-	-	-	-	-	213	53	266	266	-	-	-	-	-	-	-	-	-	3,803
3e.4	Subtotal Period 3e Period-Dependent Costs	-	-	-	-	-	-	795	199	994	994	-	-	-	-	-	-	-	-	-	8,816
3e.0	TOTAL PERIOD 3e COST	28	196	7	361	-	2,758	2,772	1,530	7,652	7,652	-	-	-	15,473	-	-	-	1,669,366	12,625	10,688

Monticello Nuclear Generating Plant
Decommissioning Cost Analysis

Table E
Monticello Nuclear Generating Plant
DECON 100 YR Fuel Storage with Recasking Decommissioning Cost Estimate
(Thousands of 2014 Dollars)

Activity Index	Activity Description	Decon Cost	Removal Cost	Packaging Costs	Transport Costs	Off-Site Processing Costs	LLRW Disposal Costs	Other Costs	Total Contingency	Total Costs	NRC Lic. Term. Costs	Spent Fuel Management Costs	Site Restoration Costs	Processed Volume Cu. Feet	Burial Volumes				Burial / Processed Wt., Lbs.	Craft Manhours	Utility and Contractor Manhours
															Class A Cu. Feet	Class B Cu. Feet	Class C Cu. Feet	GTCC Cu. Feet			
PERIOD 3f - ISFSI Site Restoration																					
Period 3f Direct Decommissioning Activities																					
Period 3f Additional Costs																					
3f.2.1	Demolition and Site Restoration of ISFSI	-	1,263	-	-	-	-	55	198	1,516	-	-	1,516	-	-	-	-	-	-	8,959	160
3f.2	Subtotal Period 3f Additional Costs	-	1,263	-	-	-	-	55	198	1,516	-	-	1,516	-	-	-	-	-	-	8,959	160
Period 3f Collateral Costs																					
3f.3.1	Small tool allowance	-	13	-	-	-	-	-	2	15	-	-	15	-	-	-	-	-	-	-	-
3f.3	Subtotal Period 3f Collateral Costs	-	13	-	-	-	-	-	2	15	-	-	15	-	-	-	-	-	-	-	-
Period 3f Period-Dependent Costs																					
3f.4.1	Insurance	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
3f.4.2	Property taxes	-	-	-	-	-	-	102	10	112	-	-	112	-	-	-	-	-	-	-	-
3f.4.3	Heavy equipment rental	-	106	-	-	-	-	-	16	121	-	-	121	-	-	-	-	-	-	-	-
3f.4.4	Plant energy budget	-	-	-	-	-	-	59	9	68	-	-	68	-	-	-	-	-	-	-	-
3f.4.5	Fixed Overhead	-	-	-	-	-	-	84	13	97	-	-	97	-	-	-	-	-	-	-	-
3f.4.6	Security Staff Cost	-	-	-	-	-	-	65	10	75	-	-	75	-	-	-	-	-	-	-	2,527
3f.4.7	Utility Staff Cost	-	-	-	-	-	-	84	13	96	-	-	96	-	-	-	-	-	-	-	1,569
3f.4	Subtotal Period 3f Period-Dependent Costs	-	106	-	-	-	-	394	70	570	-	-	570	-	-	-	-	-	-	-	4,096
3f.0	TOTAL PERIOD 3f COST	-	1,382	-	-	-	-	450	270	2,101	-	-	2,101	-	-	-	-	-	-	8,959	4,256
PERIOD 3 TOTALS		28	16,975	1,470	975	-	17,747	1,031,436	151,425	1,220,055	17,458	1,162,437	40,160	-	42,097	-	-	1,785	4,678,379	120,043	7,202,489
TOTAL COST TO DECOMMISSION		14,063	74,899	24,138	10,347	25,045	72,882	1,612,082	290,978	2,124,434	697,778	1,385,171	41,485	288,695	189,580	1,711	1,010	1,785	26,414,440	956,686	12,716,950

TOTAL COST TO DECOMMISSION WITH 15.87% CONTINGENCY:	\$2,124,434	thousands of 2014 dollars
TOTAL NRC LICENSE TERMINATION COST IS 32.85% OR:	\$697,778	thousands of 2014 dollars
SPENT FUEL MANAGEMENT COST IS 65.2% OR:	\$1,385,171	thousands of 2014 dollars
NON-NUCLEAR DEMOLITION COST IS 1.95% OR:	\$41,485	thousands of 2014 dollars
TOTAL RADWASTE VOLUME BURIED (EXCLUDING GTCC):	192,301	Cubic Feet
TOTAL GREATER THAN CLASS C RADWASTE VOLUME GENERATED:	1,785	Cubic Feet
TOTAL SCRAP METAL REMOVED:	15,499	Tons
TOTAL CRAFT LABOR REQUIREMENTS:	956,686	Man-hours

End Notes:
n/a - indicates that this activity not charged as decommissioning expense.
a - indicates that this activity performed by decommissioning staff.
0 - indicates that this value is less than 0.5 but is non-zero.
a cell containing " - " indicates a zero value

APPENDIX F

DETAILED COST ANALYSIS

SCENARIO 4

DECON DECOMMISSIONING COST ESTIMATE

WITH 200 YEARS OF SPENT FUEL STORAGE

AND PERIODIC DSC REPLACEMENT

Monticello Nuclear Generating Plant
Decommissioning Cost Analysis

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Table F
Monticello Nuclear Generating Plant
DECON 200 YR Fuel Storage with Recasking Decommissioning Cost Estimate
(Thousands of 2014 Dollars)

Activity Index	Activity Description	Decon Cost	Removal Cost	Packaging Costs	Transport Costs	Off-Site Processing Costs	LLRW Disposal Costs	Other Costs	Total Contingency	Total Costs	NRC Lic. Term. Costs	Spent Fuel Management Costs	Site Restoration Costs	Processed Volume Cu. Feet	Burial Volumes				Burial / Processed Wt., Lbs.	Craft Manhours	Utility and Contractor Manhours
															Class A Cu. Feet	Class B Cu. Feet	Class C Cu. Feet	GTCC Cu. Feet			
PERIOD 1a - Shutdown through Transition																					
Period 1a Direct Decommissioning Activities																					
1a.1.1	Prepare preliminary decommissioning cost	-	-	-	-	-	-	148	22	170	170	-	-	-	-	-	-	-	-	-	1,300
1a.1.2	Notification of Cessation of Operations									a											
1a.1.3	Remove fuel & source material									n/a											
1a.1.4	Notification of Permanent Defueling									a											
1a.1.5	Deactivate plant systems & process waste									a											
1a.1.6	Prepare and submit PSDAR	-	-	-	-	-	-	227	34	261	261	-	-	-	-	-	-	-	-	-	2,000
1a.1.7	Review plant dwgs & specs.	-	-	-	-	-	-	522	78	601	601	-	-	-	-	-	-	-	-	-	4,600
1a.1.8	Perform detailed rad survey									a											
1a.1.9	Estimate by-product inventory	-	-	-	-	-	-	114	17	131	131	-	-	-	-	-	-	-	-	-	1,000
1a.1.10	End product description	-	-	-	-	-	-	114	17	131	131	-	-	-	-	-	-	-	-	-	1,000
1a.1.11	Detailed by-product inventory	-	-	-	-	-	-	148	22	170	170	-	-	-	-	-	-	-	-	-	1,300
1a.1.12	Define major work sequence	-	-	-	-	-	-	851	128	979	979	-	-	-	-	-	-	-	-	-	7,500
1a.1.13	Perform SER and EA	-	-	-	-	-	-	352	53	405	405	-	-	-	-	-	-	-	-	-	3,100
1a.1.14	Perform Site-Specific Cost Study	-	-	-	-	-	-	568	85	653	653	-	-	-	-	-	-	-	-	-	5,000
1a.1.15	Prepare/submit License Termination Plan	-	-	-	-	-	-	465	70	535	535	-	-	-	-	-	-	-	-	-	4,096
1a.1.16	Receive NRC approval of termination plan									a											
Activity Specifications																					
1a.1.17.1	Plant & temporary facilities	-	-	-	-	-	-	559	84	642	578	-	64	-	-	-	-	-	-	-	4,920
1a.1.17.2	Plant systems	-	-	-	-	-	-	473	71	544	490	-	54	-	-	-	-	-	-	-	4,167
1a.1.17.3	NSSS Decontamination Flush	-	-	-	-	-	-	57	9	65	65	-	-	-	-	-	-	-	-	-	500
1a.1.17.4	Reactor internals	-	-	-	-	-	-	806	121	927	927	-	-	-	-	-	-	-	-	-	7,100
1a.1.17.5	Reactor vessel	-	-	-	-	-	-	738	111	849	849	-	-	-	-	-	-	-	-	-	6,500
1a.1.17.6	Sacrificial shield	-	-	-	-	-	-	57	9	65	65	-	-	-	-	-	-	-	-	-	500
1a.1.17.7	Moisture separators/reheaters	-	-	-	-	-	-	114	17	131	131	-	-	-	-	-	-	-	-	-	1,000
1a.1.17.8	Reinforced concrete	-	-	-	-	-	-	182	27	209	104	-	104	-	-	-	-	-	-	-	1,600
1a.1.17.9	Main Turbine	-	-	-	-	-	-	237	36	273	273	-	-	-	-	-	-	-	-	-	2,088
1a.1.17.10	Main Condensers	-	-	-	-	-	-	237	36	273	273	-	-	-	-	-	-	-	-	-	2,088
1a.1.17.11	Pressure suppression structure	-	-	-	-	-	-	227	34	261	261	-	-	-	-	-	-	-	-	-	2,000
1a.1.17.12	Drywell	-	-	-	-	-	-	182	27	209	209	-	-	-	-	-	-	-	-	-	1,600
1a.1.17.13	Plant structures & buildings	-	-	-	-	-	-	354	53	407	204	-	204	-	-	-	-	-	-	-	3,120
1a.1.17.14	Waste management	-	-	-	-	-	-	522	78	601	601	-	-	-	-	-	-	-	-	-	4,600
1a.1.17.15	Facility & site closeout	-	-	-	-	-	-	102	15	118	59	-	59	-	-	-	-	-	-	-	900
1a.1.17	Total	-	-	-	-	-	-	4,846	727	5,573	5,087	-	486	-	-	-	-	-	-	-	42,683
Planning & Site Preparations																					
1a.1.18	Prepare dismantling sequence	-	-	-	-	-	-	272	41	313	313	-	-	-	-	-	-	-	-	-	2,400
1a.1.19	Plant prep. & temp. svces	-	-	-	-	-	-	3,000	450	3,450	3,450	-	-	-	-	-	-	-	-	-	-
1a.1.20	Design water clean-up system	-	-	-	-	-	-	159	24	183	183	-	-	-	-	-	-	-	-	-	1,400
1a.1.21	Rigging/Cont. Cntrl Envlp/tooling/etc.	-	-	-	-	-	-	2,300	345	2,645	2,645	-	-	-	-	-	-	-	-	-	-
1a.1.22	Procure casks/liners & containers	-	-	-	-	-	-	140	21	161	161	-	-	-	-	-	-	-	-	-	1,230
1a.1	Subtotal Period 1a Activity Costs	-	-	-	-	-	-	14,224	2,134	16,358	15,873	-	486	-	-	-	-	-	-	-	78,609
Period 1a Collateral Costs																					
1a.3.1	Spent Fuel Capital and Transfer	-	-	-	-	-	-	25,293	3,794	29,087	-	29,087	-	-	-	-	-	-	-	-	-
1a.3	Subtotal Period 1a Collateral Costs	-	-	-	-	-	-	25,293	3,794	29,087	-	29,087	-	-	-	-	-	-	-	-	-
Period 1a Period-Dependent Costs																					
1a.4.1	Insurance	-	-	-	-	-	-	1,418	142	1,560	1,560	-	-	-	-	-	-	-	-	-	-
1a.4.2	Property taxes	-	-	-	-	-	-	2,718	272	2,990	2,990	-	-	-	-	-	-	-	-	-	-
1a.4.3	Health physics supplies	-	490	-	-	-	-	-	123	613	613	-	-	-	-	-	-	-	-	-	-
1a.4.4	Heavy equipment rental	-	528	-	-	-	-	-	79	608	608	-	-	-	-	-	-	-	-	-	-
1a.4.5	Disposal of DAW generated	-	-	13	4	-	48	-	14	79	79	-	-	610	-	-	-	-	12,190	20	-
1a.4.6	Plant energy budget	-	-	-	-	-	-	3,530	530	4,060	4,060	-	-	-	-	-	-	-	-	-	-
1a.4.7	NRC Fees	-	-	-	-	-	-	1,181	118	1,299	1,299	-	-	-	-	-	-	-	-	-	-
1a.4.8	Emergency Planning Fees	-	-	-	-	-	-	3,121	312	3,433	-	3,433	-	-	-	-	-	-	-	-	-
1a.4.9	Fixed Overhead	-	-	-	-	-	-	2,434	365	2,799	2,799	-	-	-	-	-	-	-	-	-	-
1a.4.10	Spent Fuel Pool O&M	-	-	-	-	-	-	791	119	910	-	910	-	-	-	-	-	-	-	-	-
1a.4.11	ISFSI Operating Costs	-	-	-	-	-	-	95	14	110	-	110	-	-	-	-	-	-	-	-	-
1a.4.12	Railroad Track Maintenance	-	-	-	-	-	-	107	16	123	123	-	-	-	-	-	-	-	-	-	-
1a.4.13	Security Staff Cost	-	-	-	-	-	-	5,349	802	6,151	6,151	-	-	-	-	-	-	-	-	-	157,471
1a.4.14	Utility Staff Cost	-	-	-	-	-	-	22,165	3,325	25,489	25,489	-	-	-	-	-	-	-	-	-	423,400
1a.4	Subtotal Period 1a Period-Dependent Costs	-	1,018	13	4	-	48	42,909	6,230	50,222	45,769	4,453	-	610	-	-	-	-	12,190	20	580,871
1a.0	TOTAL PERIOD 1a COST	-	1,018	13	4	-	48	82,426	12,158	95,667	61,642	33,540	486	-	610	-	-	-	12,190	20	659,480

Monticello Nuclear Generating Plant
Decommissioning Cost Analysis

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Table F
Monticello Nuclear Generating Plant
DECON 200 YR Fuel Storage with Recasking Decommissioning Cost Estimate
(Thousands of 2014 Dollars)

Activity Index	Activity Description	Decon Cost	Removal Cost	Packaging Costs	Transport Costs	Off-Site Processing Costs	LLRW Disposal Costs	Other Costs	Total Contingency	Total Costs	NRC Lic. Term. Costs	Spent Fuel Management Costs	Site Restoration Costs	Processed Volume Cu. Feet	Burial Volumes				Burial / Processed Wt., Lbs.	Craft Manhours	Utility and Contractor Manhours
															Class A Cu. Feet	Class B Cu. Feet	Class C Cu. Feet	GTCC Cu. Feet			
PERIOD 1b - Decommissioning Preparations																					
Period 1b Direct Decommissioning Activities																					
Detailed Work Procedures																					
1b.1.1.1	Plant systems	-	-	-	-	-	-	537	81	618	556	-	62	-	-	-	-	-	-	-	4,733
1b.1.1.2	NSSS Decontamination Flush	-	-	-	-	-	-	114	17	131	131	-	-	-	-	-	-	-	-	-	1,000
1b.1.1.3	Reactor internals	-	-	-	-	-	-	454	68	522	522	-	-	-	-	-	-	-	-	-	4,000
1b.1.1.4	Remaining buildings	-	-	-	-	-	-	153	23	176	44	-	132	-	-	-	-	-	-	-	1,350
1b.1.1.5	CRD housings & NIs	-	-	-	-	-	-	114	17	131	131	-	-	-	-	-	-	-	-	-	1,000
1b.1.1.6	Incore instrumentation	-	-	-	-	-	-	114	17	131	131	-	-	-	-	-	-	-	-	-	1,000
1b.1.1.7	Removal primary containment	-	-	-	-	-	-	227	34	261	261	-	-	-	-	-	-	-	-	-	2,000
1b.1.1.8	Reactor vessel	-	-	-	-	-	-	412	62	474	474	-	-	-	-	-	-	-	-	-	3,630
1b.1.1.9	Facility closeout	-	-	-	-	-	-	136	20	157	78	-	78	-	-	-	-	-	-	-	1,200
1b.1.1.10	Sacrificial shield	-	-	-	-	-	-	136	20	157	157	-	-	-	-	-	-	-	-	-	1,200
1b.1.1.11	Reinforced concrete	-	-	-	-	-	-	114	17	131	65	-	65	-	-	-	-	-	-	-	1,000
1b.1.1.12	Main Turbine	-	-	-	-	-	-	236	35	272	272	-	-	-	-	-	-	-	-	-	2,080
1b.1.1.13	Main Condensers	-	-	-	-	-	-	237	36	273	273	-	-	-	-	-	-	-	-	-	2,088
1b.1.1.14	Moisture separators & reheaters	-	-	-	-	-	-	227	34	261	261	-	-	-	-	-	-	-	-	-	2,000
1b.1.1.15	Radwaste building	-	-	-	-	-	-	310	46	356	321	-	36	-	-	-	-	-	-	-	2,730
1b.1.1.16	Reactor building	-	-	-	-	-	-	310	46	356	321	-	36	-	-	-	-	-	-	-	2,730
1b.1.1	Total	-	-	-	-	-	-	3,831	575	4,405	3,996	-	409	-	-	-	-	-	-	-	33,741
1b.1.2	Decon NSSS	262	-	-	-	-	-	-	131	393	393	-	-	-	-	-	-	-	-	1,067	-
1b.1	Subtotal Period 1b Activity Costs	262	-	-	-	-	-	3,831	705	4,798	4,389	-	409	-	-	-	-	-	-	1,067	33,741
Period 1b Additional Costs																					
1b.2.1	Spent fuel pool isolation	-	-	-	-	-	-	10,813	1,622	12,434	12,434	-	-	-	-	-	-	-	-	-	-
1b.2.2	Site Characterization	-	-	-	-	-	-	5,244	1,573	6,818	6,818	-	-	-	-	-	-	-	-	30,500	10,852
1b.2.3	Mixed & RCRA Waste	-	-	26	19	12	-	-	7	65	65	-	-	43	-	-	-	-	5,253	163	-
1b.2	Subtotal Period 1b Additional Costs	-	-	26	19	12	-	16,057	3,202	19,317	19,317	-	-	43	-	-	-	-	5,253	30,663	10,852
Period 1b Collateral Costs																					
1b.3.1	Decon equipment	881	-	-	-	-	-	-	132	1,013	1,013	-	-	-	-	-	-	-	-	-	-
1b.3.2	DOC staff relocation expenses	-	-	-	-	-	-	1,708	256	1,964	1,964	-	-	-	-	-	-	-	-	-	-
1b.3.3	Process decommissioning water waste	37	-	24	60	-	104	-	56	280	280	-	-	-	233	-	-	-	13,986	45	-
1b.3.4	Process decommissioning chemical flush waste	1	-	23	82	-	1,385	-	361	1,852	1,852	-	-	-	-	231	-	-	24,599	43	-
1b.3.5	Small tool allowance	-	2	-	-	-	-	-	0	2	2	-	-	-	-	-	-	-	-	-	-
1b.3.6	Pipe cutting equipment	-	1,100	-	-	-	-	-	165	1,265	1,265	-	-	-	-	-	-	-	-	-	-
1b.3.7	Decon rig	1,500	-	-	-	-	-	-	225	1,725	1,725	-	-	-	-	-	-	-	-	-	-
1b.3.8	Spent Fuel Capital and Transfer	-	-	-	-	-	-	27	4	31	-	31	-	-	-	-	-	-	-	-	-
1b.3	Subtotal Period 1b Collateral Costs	2,418	1,102	47	142	-	1,489	1,734	1,199	8,131	8,101	31	-	-	233	231	-	-	38,585	89	-
Period 1b Period-Dependent Costs																					
1b.4.1	Decon supplies	27	-	-	-	-	-	-	7	34	34	-	-	-	-	-	-	-	-	-	-
1b.4.2	Insurance	-	-	-	-	-	-	711	71	782	782	-	-	-	-	-	-	-	-	-	-
1b.4.3	Property taxes	-	-	-	-	-	-	1,339	134	1,472	1,472	-	-	-	-	-	-	-	-	-	-
1b.4.4	Health physics supplies	-	276	-	-	-	-	-	69	345	345	-	-	-	-	-	-	-	-	-	-
1b.4.5	Heavy equipment rental	-	265	-	-	-	-	-	40	305	305	-	-	-	-	-	-	-	-	-	-
1b.4.6	Disposal of DAW generated	-	-	7	3	-	28	-	8	46	46	-	-	-	358	-	-	-	7,159	12	-
1b.4.7	Plant energy budget	-	-	-	-	-	-	3,540	531	4,071	4,071	-	-	-	-	-	-	-	-	-	-
1b.4.8	NRC Fees	-	-	-	-	-	-	346	35	381	381	-	-	-	-	-	-	-	-	-	-
1b.4.9	Emergency Planning Fees	-	-	-	-	-	-	1,565	156	1,721	-	1,721	-	-	-	-	-	-	-	-	-
1b.4.10	Fixed Overhead	-	-	-	-	-	-	1,220	183	1,403	1,403	-	-	-	-	-	-	-	-	-	-
1b.4.11	Spent Fuel Pool O&M	-	-	-	-	-	-	397	59	456	-	456	-	-	-	-	-	-	-	-	-
1b.4.12	ISFSI Operating Costs	-	-	-	-	-	-	48	7	55	-	55	-	-	-	-	-	-	-	-	-
1b.4.13	Railroad Track Maintenance	-	-	-	-	-	-	53	8	62	62	-	-	-	-	-	-	-	-	-	-
1b.4.14	Security Staff Cost	-	-	-	-	-	-	2,682	402	3,084	3,084	-	-	-	-	-	-	-	-	-	78,951
1b.4.15	DOC Staff Cost	-	-	-	-	-	-	4,755	713	5,468	5,468	-	-	-	-	-	-	-	-	-	63,789
1b.4.16	Utility Staff Cost	-	-	-	-	-	-	11,170	1,675	12,845	12,845	-	-	-	-	-	-	-	-	-	213,326
1b.4	Subtotal Period 1b Period-Dependent Costs	27	541	7	3	-	28	27,824	4,099	32,530	30,297	2,232	-	-	358	-	-	-	7,159	12	356,066
1b.0	TOTAL PERIOD 1b COST	2,707	1,643	80	164	12	1,517	49,446	9,207	64,776	62,103	2,263	409	43	591	231	-	-	50,997	31,830	400,659
PERIOD 1 TOTALS		2,707	2,661	93	168	12	1,565	131,872	21,364	160,443	123,745	35,803	894	43	1,201	231	-	-	63,188	31,850	1,060,139

Table F
Monticello Nuclear Generating Plant
DECON 200 YR Fuel Storage with Recasking Decommissioning Cost Estimate
(Thousands of 2014 Dollars)

Activity Index	Activity Description	Decon Cost	Removal Cost	Packaging Costs	Transport Costs	Off-Site	LLRW	Other Costs	Total Contingency	Total Costs	NRC	Spent Fuel	Site	Processed Volume Cu. Feet	Burial Volumes				Burial /	Craft Manhours	Utility and
						Processing Costs	Disposal Costs				Lic. Term. Costs	Management Costs	Restoration Costs		Class A Cu. Feet	Class B Cu. Feet	Class C Cu. Feet	GTCC Cu. Feet	Processed Wt., Lbs.		Contractor Manhours
PERIOD 2a - Large Component Removal																					
Period 2a Direct Decommissioning Activities																					
Nuclear Steam Supply System Removal																					
2a.1.1.1	Recirculation System Piping & Valves	92	78	17	22	-	407	-	172	789	789	-	-	-	858	-	-	-	98,047	2,888	-
2a.1.1.2	Recirculation Pumps & Motors	33	52	15	37	21	423	-	146	727	727	-	-	96	945	-	-	-	112,200	1,563	-
2a.1.1.3	CRDMs & NIs Removal	162	857	400	98	-	887	-	572	2,976	2,976	-	-	-	3,741	-	-	-	213,700	17,768	-
2a.1.1.4	Reactor Vessel Internals	193	3,392	15,478	2,739	-	19,466	309	16,974	58,552	58,552	-	-	-	1,252	1,481	1,010	-	312,338	27,675	1,239
2a.1.1.5	Reactor Vessel	94	7,234	2,229	976	-	3,459	309	8,050	22,352	22,352	-	-	-	10,736	-	-	-	1,089,965	27,675	1,239
2a.1.1	Totals	574	11,614	18,139	3,873	21	24,642	619	25,914	85,396	85,396	-	-	96	17,532	1,481	1,010	-	1,826,250	77,569	2,478
Removal of Major Equipment																					
2a.1.2	Main Turbine/Generator	-	326	1,455	390	3,137	352	-	844	6,504	6,504	-	-	25,377	1,413	-	-	-	1,616,032	5,557	-
2a.1.3	Main Condensers	-	1,109	379	140	1,613	199	-	628	4,067	4,067	-	-	17,396	727	-	-	-	830,822	18,831	-
Cascading Costs from Clean Building Demolition																					
2a.1.4.1	Reactor Building	-	611	-	-	-	-	-	92	703	703	-	-	-	-	-	-	-	-	6,238	-
2a.1.4.2	Radwaste	-	53	-	-	-	-	-	8	61	61	-	-	-	-	-	-	-	-	569	-
2a.1.4.3	Turbine	-	157	-	-	-	-	-	24	180	180	-	-	-	-	-	-	-	-	1,884	-
2a.1.4	Totals	-	821	-	-	-	-	-	123	944	944	-	-	-	-	-	-	-	-	8,691	-
Disposal of Plant Systems																					
2a.1.5.1	Automatic Press Relief	-	98	6	8	67	57	-	51	287	287	-	-	803	206	-	-	-	46,236	1,656	-
2a.1.5.2	Chemistry Sampling	-	23	1	2	13	10	-	11	59	59	-	-	156	37	-	-	-	8,774	400	-
2a.1.5.3	Chemistry Sampling - Insulated	-	1	0	0	-	0	-	0	2	2	-	-	-	1	-	-	-	73	28	-
2a.1.5.4	Circulating Water - RCA	-	172	10	44	557	-	-	134	917	917	-	-	6,656	-	-	-	-	270,307	2,860	-
2a.1.5.5	Combustible Gas Control - Insul - RCA	-	24	0	1	18	-	-	9	53	53	-	-	212	-	-	-	-	8,617	378	-
2a.1.5.6	Combustible Gas Control - RCA	-	15	0	2	24	-	-	8	49	49	-	-	285	-	-	-	-	11,577	245	-
2a.1.5.7	Condensate & Feedwater	-	818	178	244	1,669	2,008	-	1,011	5,929	5,929	-	-	19,947	7,319	-	-	-	1,293,969	14,196	-
2a.1.5.8	Condensate & Feedwater - Insulated	-	408	33	46	349	331	-	247	1,414	1,414	-	-	4,176	1,207	-	-	-	249,413	6,964	-
2a.1.5.9	Condensate Demin	-	451	28	37	280	274	-	232	1,303	1,303	-	-	3,346	1,000	-	-	-	201,994	7,618	-
2a.1.5.10	Condensate Storage	-	604	29	60	597	216	-	306	1,811	1,811	-	-	7,131	795	-	-	-	341,719	10,345	-
2a.1.5.11	Control Rod Drive	-	2	0	0	2	1	-	1	7	7	-	-	19	4	-	-	-	1,015	41	-
2a.1.5.12	Control Rod Drive Hydraulic	-	344	15	20	139	154	-	150	822	822	-	-	1,658	562	-	-	-	104,537	5,898	-
2a.1.5.13	Core Spray	-	66	18	37	367	143	-	115	745	745	-	-	4,384	521	-	-	-	212,510	1,163	-
2a.1.5.14	Core Spray - Insulated	-	120	7	9	68	72	-	60	338	338	-	-	818	264	-	-	-	50,680	2,033	-
2a.1.5.15	Demin Water - Insulated - RCA	-	12	0	1	7	-	-	4	24	24	-	-	85	-	-	-	-	3,445	181	-
2a.1.5.16	Demin Water - RCA	-	34	0	2	21	-	-	12	69	69	-	-	253	-	-	-	-	10,278	508	-
2a.1.5.17	Diesel Oil - RCA	-	2	0	0	2	-	-	1	4	4	-	-	23	-	-	-	-	931	25	-
2a.1.5.18	Drywell Atmosphere Cooling - RCA	-	31	1	4	46	-	-	15	97	97	-	-	548	-	-	-	-	22,244	550	-
2a.1.5.19	EDG Emerg Service Water - Insul - RCA	-	0	0	0	0	-	-	0	1	1	-	-	2	-	-	-	-	84	4	-
2a.1.5.20	Electrical - Clean	-	11	-	-	-	-	-	2	12	-	-	12	-	-	-	-	-	-	182	-
2a.1.5.21	Emergency Service Water - Insul - RCA	-	18	0	1	11	-	-	6	37	37	-	-	137	-	-	-	-	5,544	281	-
2a.1.5.22	Emergency Service Water - RCA	-	1	0	0	1	-	-	1	3	3	-	-	13	-	-	-	-	512	22	-
2a.1.5.23	GEZIP - RCA	-	3	0	1	9	-	-	2	14	14	-	-	103	-	-	-	-	4,184	48	-
2a.1.5.24	Generator Physical Design - RCA	-	4	0	0	3	-	-	1	8	8	-	-	31	-	-	-	-	1,250	67	-
2a.1.5.25	H2-O2 Control Analyzing	-	5	0	0	0	4	-	2	12	12	-	-	6	13	-	-	-	1,089	81	-
2a.1.5.26	H2-O2 Control Analyzing - Insulated	-	5	0	0	0	4	-	2	12	12	-	-	6	13	-	-	-	1,089	81	-
2a.1.5.27	High Pressure Coolant Injection	-	56	6	10	81	57	-	42	252	252	-	-	972	209	-	-	-	53,266	966	-
2a.1.5.28	High Pressure Coolant Injection - Insula	-	182	13	18	134	132	-	103	582	582	-	-	1,598	481	-	-	-	96,733	3,079	-
2a.1.5.29	Hydrogen Cooling	-	7	-	-	-	-	-	1	8	-	-	8	-	-	-	-	-	-	118	-
2a.1.5.30	Hydrogen Cooling - RCA	-	6	0	0	3	-	-	2	11	11	-	-	39	-	-	-	-	1,600	79	-
2a.1.5.31	Hydrogen Seal Oil - RCA	-	14	0	1	16	-	-	6	38	38	-	-	189	-	-	-	-	7,669	212	-
2a.1.5.32	Hydrogen Water Chemistry - RCA	-	20	0	1	12	-	-	7	40	40	-	-	140	-	-	-	-	5,672	304	-
2a.1.5.33	Instrument & Service Air - RCA	-	185	3	12	148	-	-	71	418	418	-	-	1,768	-	-	-	-	71,810	2,733	-
2a.1.5.34	Main Condenser	-	162	11	15	112	113	-	89	502	502	-	-	1,333	411	-	-	-	81,311	2,746	-
2a.1.5.35	Main Steam	-	206	16	23	180	163	-	124	712	712	-	-	2,148	594	-	-	-	126,485	3,512	-
2a.1.5.36	Main Turbine	-	839	203	263	1,653	2,383	-	1,113	6,454	6,454	-	-	19,760	8,687	-	-	-	1,376,578	14,733	-
2a.1.5.37	Main Turbine - Insulated	-	178	17	27	212	183	-	128	745	745	-	-	2,530	667	-	-	-	146,839	3,069	-
2a.1.5.38	Miscellaneous	-	35	0	2	25	-	-	13	76	76	-	-	302	-	-	-	-	12,283	622	-
2a.1.5.39	Off Gas Recombiner	-	157	18	24	150	210	-	120	678	678	-	-	1,795	764	-	-	-	123,437	2,708	-
2a.1.5.40	Off Gas Recombiner - Insulated	-	320	18	20	114	195	-	151	818	818	-	-	1,366	709	-	-	-	102,395	5,385	-
2a.1.5.41	Post Accident Sampling	-	21	1	1	4	9	-	8	44	44	-	-	53	33	-	-	-	4,355	345	-
2a.1.5.42	Post Accident Sampling - Insulated	-	14	1	1	1	10	-	6	34	34	-	-	17	37	-	-	-	3,143	212	-
2a.1.5.43	RHR Service Water - Insulated - RCA	-	69	2	10	124	-	-	37	242	242	-	-	1,485	-	-	-	-	60,293	1,125	-
2a.1.5.44	RHR Service Water - RCA	-	3	0	0	3	-	-	1	8	8	-	-	35	-	-	-	-	1,410	57	-
2a.1.5.45	Reactor Feedwater Pump Seal	-	46	2	3	16	26	-	21	115	115	-	-	193	96	-	-	-	14,222	773	-
2a.1.5.46	Residual Heat Removal	320	209	162	134	536	1,653	-	742	3,755	3,755	-	-	6,406	6,012	-	-	-	658,423	4,135	-

Monticello Nuclear Generating Plant
Decommissioning Cost Analysis

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Table F
Monticello Nuclear Generating Plant
DECON 200 YR Fuel Storage with Recasking Decommissioning Cost Estimate
(Thousands of 2014 Dollars)

Activity Index	Activity Description	Decon Cost	Removal Cost	Packaging Costs	Transport Costs	Off-Site Processing Costs	LLRW Disposal Costs	Other Costs	Total Contingency	Total Costs	NRC Lic. Term. Costs	Spent Fuel Management Costs	Site Restoration Costs	Processed Volume Cu. Feet	Burial Volumes				Burial / Processed Wt., Lbs.	Craft Manhours	Utility and Contractor Manhours
															Class A Cu. Feet	Class B Cu. Feet	Class C Cu. Feet	GTCC Cu. Feet			
Disposal of Plant Systems (continued)																					
2a.1.5.47	Residual Heat Removal - Insulated	542	461	61	62	282	716	-	623	2,746	2,746	-	-	3,367	2,607	-	-	-	309,163	10,340	-
2a.1.5.48	Rx Core Isolation Cooling	-	40	2	3	22	21	-	19	107	107	-	-	259	76	-	-	-	15,537	691	-
2a.1.5.49	Rx Core Isolation Cooling - Insulated	-	89	5	5	24	54	-	41	218	218	-	-	288	198	-	-	-	24,804	1,479	-
2a.1.5.50	Rx Recirculation	47	48	5	3	4	52	-	50	210	210	-	-	43	190	-	-	-	14,353	1,580	-
2a.1.5.51	Snubbers	-	141	2	4	32	25	-	47	251	251	-	-	377	90	-	-	-	21,240	2,548	-
2a.1.5.52	Standby Liquid Control - Insul - RCA	-	3	0	0	2	-	-	1	6	6	-	-	22	-	-	-	-	904	48	-
2a.1.5.53	Standby Liquid Control - RCA	-	22	0	2	21	-	-	9	53	53	-	-	245	-	-	-	-	9,969	341	-
2a.1.5.54	Stator Cooling - RCA	-	6	0	1	11	-	-	3	21	21	-	-	126	-	-	-	-	5,135	98	-
2a.1.5.55	Traversing Incore Probe	0	3	0	0	0	2	-	1	6	6	-	-	1	5	-	-	-	390	51	-
2a.1.5	Totals	909	6,814	882	1,164	8,170	9,278	-	5,964	33,181	33,161	-	20	97,654	33,808	-	-	-	6,201,492	119,943	-
2a.1.6	Scaffolding in support of decommissioning	-	1,911	24	9	95	25	-	502	2,566	2,566	-	-	1,030	91	-	-	-	52,344	22,564	-
2a.1	Subtotal Period 2a Activity Costs	1,483	22,596	20,878	5,575	13,035	34,496	619	33,975	132,658	132,638	-	20	141,552	53,571	1,481	1,010	-	10,526,940	253,155	2,478
Period 2a Additional Costs																					
2a.2.1	Remedial Action Surveys	-	-	-	-	-	-	1,343	403	1,746	1,746	-	-	-	-	-	-	-	-	27,506	-
2a.2	Subtotal Period 2a Additional Costs	-	-	-	-	-	-	1,343	403	1,746	1,746	-	-	-	-	-	-	-	-	27,506	-
Period 2a Collateral Costs																					
2a.3.1	Process decommissioning water waste	84	-	55	139	-	239	-	128	645	645	-	-	-	538	-	-	-	32,290	105	-
2a.3.2	Process decommissioning chemical flush waste	5	-	206	746	-	1,652	-	548	3,157	3,157	-	-	-	2,093	-	-	-	223,008	392	-
2a.3.3	Small tool allowance	-	270	-	-	-	-	-	41	311	280	-	31	-	-	-	-	-	-	-	-
2a.3.4	Spent Fuel Capital and Transfer	-	-	-	-	-	-	71	11	81	-	81	-	-	-	-	-	-	-	-	-
2a.3.5	On-site survey and release of 0.0 tons clean metallic waste	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2a.3	Subtotal Period 2a Collateral Costs	89	270	261	884	-	1,892	71	727	4,194	4,082	81	31	-	2,631	-	-	-	255,298	497	-
Period 2a Period-Dependent Costs																					
2a.4.1	Decon supplies	71	-	-	-	-	-	-	18	89	89	-	-	-	-	-	-	-	-	-	-
2a.4.2	Insurance	-	-	-	-	-	-	777	78	854	854	-	-	-	-	-	-	-	-	-	-
2a.4.3	Property taxes	-	-	-	-	-	-	3,365	336	3,701	3,331	-	370	-	-	-	-	-	-	-	-
2a.4.4	Health physics supplies	-	1,940	-	-	-	-	-	485	2,425	2,425	-	-	-	-	-	-	-	-	-	-
2a.4.5	Heavy equipment rental	-	2,687	-	-	-	-	-	403	3,090	3,090	-	-	-	-	-	-	-	-	-	-
2a.4.6	Disposal of DAW generated	-	-	112	39	-	424	-	123	699	699	-	-	-	5,394	-	-	-	107,886	176	-
2a.4.7	Plant energy budget	-	-	-	-	-	-	4,438	666	5,103	5,103	-	-	-	-	-	-	-	-	-	-
2a.4.8	NRC Fees	-	-	-	-	-	-	829	83	911	911	-	-	-	-	-	-	-	-	-	-
2a.4.9	Emergency Planning Fees	-	-	-	-	-	-	3,399	340	3,739	-	3,739	-	-	-	-	-	-	-	-	-
2a.4.10	Fixed Overhead	-	-	-	-	-	-	2,459	369	2,827	2,827	-	-	-	-	-	-	-	-	-	-
2a.4.11	Spent Fuel Pool O&M	-	-	-	-	-	-	1,047	157	1,204	-	1,204	-	-	-	-	-	-	-	-	-
2a.4.12	ISFSI Operating Costs	-	-	-	-	-	-	126	19	145	-	145	-	-	-	-	-	-	-	-	-
2a.4.13	Railroad Track Maintenance	-	-	-	-	-	-	141	21	162	162	-	-	-	-	-	-	-	-	-	-
2a.4.14	Security Staff Cost	-	-	-	-	-	-	6,002	900	6,902	6,902	-	-	-	-	-	-	-	-	-	174,570
2a.4.15	DOC Staff Cost	-	-	-	-	-	-	15,225	2,284	17,509	17,509	-	-	-	-	-	-	-	-	-	209,760
2a.4.16	Utility Staff Cost	-	-	-	-	-	-	21,262	3,189	24,451	24,451	-	-	-	-	-	-	-	-	-	390,540
2a.4	Subtotal Period 2a Period-Dependent Costs	71	4,627	112	39	-	424	59,068	9,471	73,813	68,355	5,088	370	-	5,394	-	-	-	107,886	176	774,870
2a.0	TOTAL PERIOD 2a COST	1,643	27,494	21,252	6,499	13,035	36,812	61,101	44,576	212,411	206,821	5,169	421	141,552	61,596	1,481	1,010	-	10,890,130	281,333	777,348
PERIOD 2b - Site Decontamination																					
Period 2b Direct Decommissioning Activities																					
Disposal of Plant Systems																					
2b.1.1.1	ALARA/Radiological	-	15	0	0	3	3	-	5	27	27	-	-	35	10	-	-	-	2,083	277	-
2b.1.1.2	Alternate N2 - RCA	-	13	0	1	8	-	-	5	27	27	-	-	93	-	-	-	-	3,765	185	-
2b.1.1.3	Decontamination Projects	-	1	0	0	0	0	-	0	2	2	-	-	2	0	-	-	-	130	17	-
2b.1.1.4	Electrical - Contaminated	-	366	5	17	200	25	-	131	744	744	-	-	2,389	90	-	-	-	102,957	6,325	-
2b.1.1.5	Electrical - Decontaminated	-	2,195	36	156	1,953	-	-	869	5,208	5,208	-	-	23,344	-	-	-	-	948,013	37,107	-
2b.1.1.6	Fire - RCA	-	84	1	4	51	-	-	29	169	169	-	-	614	-	-	-	-	24,917	1,324	-
2b.1.1.7	HVAC Ductwork	-	263	6	19	223	28	-	110	649	649	-	-	2,665	100	-	-	-	114,856	4,111	-
2b.1.1.8	HVAC/Chilled Water - RCA	-	267	4	18	230	-	-	104	624	624	-	-	2,752	-	-	-	-	111,779	3,985	-
2b.1.1.9	Heating & Ventilation	-	401	14	44	503	62	-	199	1,224	1,224	-	-	6,018	227	-	-	-	259,372	7,101	-
2b.1.1.10	Heating Boiler - Insulated - RCA	-	2	0	0	2	-	-	1	5	5	-	-	26	-	-	-	-	1,058	35	-
2b.1.1.11	Liquid Radwaste	494	571	44	46	257	468	-	557	2,437	2,437	-	-	3,073	1,728	-	-	-	237,560	17,194	-
2b.1.1.12	Makeup Demin - RCA	-	86	2	10	123	-	-	42	263	263	-	-	1,471	-	-	-	-	59,747	1,412	-
2b.1.1.13	Non-Essential Diesel Generator - RCA	-	23	2	9	119	-	-	25	179	179	-	-	1,424	-	-	-	-	57,832	395	-
2b.1.1.14	Off Gas Holdup	-	283	19	28	230	172	-	155	888	888	-	-	2,755	630	-	-	-	153,412	4,769	-
2b.1.1.15	Primary Containment	-	378	40	64	519	413	-	289	1,703	1,703	-	-	6,201	1,506	-	-	-	351,391	6,454	-

Table F
Monticello Nuclear Generating Plant
DECON 200 YR Fuel Storage with Recasking Decommissioning Cost Estimate
(Thousands of 2014 Dollars)

Activity Index	Activity Description	Decon Cost	Removal Cost	Packaging Costs	Transport Costs	Off-Site	LLRW	Other Costs	Total Contingency	Total Costs	NRC	Spent Fuel	Site	Processed Volume Cu. Feet	Burial Volumes				Burial /	Craft Manhours	Utility and
						Processing Costs	Disposal Costs				Lic. Term. Costs	Management Costs	Restoration Costs		Class A Cu. Feet	Class B Cu. Feet	Class C Cu. Feet	GTCC Cu. Feet	Processed Wt., Lbs.		Contractor Manhours
Disposal of Plant Systems (continued)																					
2b.1.1.16	Process Radiation Monitors	-	38	2	2	12	14	-	15	83	83	-	-	142	52	-	-	-	9,195	649	-
2b.1.1.17	Rx Bldg Closed Clng Water - Insul - RCA	-	93	2	7	82	-	-	37	220	220	-	-	977	-	-	-	-	39,675	1,484	-
2b.1.1.18	Rx Bldg Closed Clng Water - RCA	-	152	11	47	593	-	-	135	938	938	-	-	7,093	-	-	-	-	288,031	2,489	-
2b.1.1.19	Rx Component Handling Equip	23	117	18	20	97	228	-	117	621	621	-	-	1,158	829	-	-	-	101,862	2,462	-
2b.1.1.20	Rx Pressure Vessel	23	39	5	4	6	63	-	39	181	181	-	-	75	230	-	-	-	18,281	1,051	-
2b.1.1.21	Rx Water Cleanup	145	220	18	12	11	202	-	184	793	793	-	-	130	737	-	-	-	54,051	5,736	-
2b.1.1.22	Secondary Containment	-	103	7	11	85	70	-	58	334	334	-	-	1,017	255	-	-	-	58,151	1,763	-
2b.1.1.23	Service & Seal Water - Insulated - RCA	-	99	2	8	99	-	-	41	249	249	-	-	1,180	-	-	-	-	47,917	1,565	-
2b.1.1.24	Service & Seal Water - RCA	-	131	3	12	151	-	-	58	355	355	-	-	1,809	-	-	-	-	73,453	2,016	-
2b.1.1.25	Service Air Blower - RCA	-	13	0	1	17	-	-	6	38	38	-	-	206	-	-	-	-	8,364	206	-
2b.1.1.26	Solid Radwaste	285	409	34	37	200	375	-	378	1,718	1,718	-	-	2,387	1,380	-	-	-	187,377	10,820	-
2b.1.1.27	Structures & Buildings	-	64	2	4	30	23	-	27	151	151	-	-	357	85	-	-	-	20,152	1,128	-
2b.1.1.28	Wells & Domestic Water	-	8	-	-	-	-	-	1	9	-	-	9	-	-	-	-	-	-	144	-
2b.1.1.29	Wells & Domestic Water - RCA	-	43	1	2	29	-	-	15	90	90	-	-	342	-	-	-	-	13,874	633	-
2b.1.1	Totals	971	6,479	280	584	5,834	2,147	-	3,632	19,926	19,917	-	-	9	69,735	7,859	-	-	3,349,255	122,835	-
2b.1.2	Scaffolding in support of decommissioning	-	2,389	29	11	119	31	-	628	3,208	3,208	-	-	1,287	114	-	-	-	65,430	28,205	-
Decontamination of Site Buildings																					
2b.1.3.1	Reactor Building	4,343	2,430	138	368	4,022	978	-	3,696	15,975	15,975	-	-	48,077	4,667	-	-	-	2,318,995	112,507	-
2b.1.3.2	Admin	91	5	0	2	-	13	-	50	161	161	-	-	-	79	-	-	-	6,840	1,599	-
2b.1.3.3	HPCI Room	24	24	0	2	10	12	-	23	96	96	-	-	118	70	-	-	-	10,760	789	-
2b.1.3.4	Hot Shop	14	4	0	1	-	9	-	11	39	39	-	-	-	56	-	-	-	4,860	286	-
2b.1.3.5	LLRW Storage & Shipping	49	21	1	5	3	39	-	41	159	159	-	-	31	237	-	-	-	21,708	1,126	-
2b.1.3.6	Offgas Stack	315	228	5	16	112	70	-	252	998	998	-	-	1,343	388	-	-	-	87,082	8,859	-
2b.1.3.7	Offgas Storage & Compressor	35	15	0	4	2	29	-	29	114	114	-	-	25	173	-	-	-	15,948	785	-
2b.1.3.8	Radwaste	103	53	2	12	14	83	-	90	357	357	-	-	172	501	-	-	-	49,943	2,501	-
2b.1.3.9	Radwaste Material Storage Warehouse	54	21	1	6	-	45	-	45	171	171	-	-	-	270	-	-	-	23,400	1,196	-
2b.1.3.10	Recombiner	23	21	1	4	17	21	-	25	111	111	-	-	199	121	-	-	-	18,405	695	-
2b.1.3.11	Turbine	601	304	10	72	107	489	-	526	2,109	2,109	-	-	1,283	2,912	-	-	-	303,150	14,432	-
2b.1.3.12	Turbine Building Addition	50	18	1	5	-	39	-	40	153	153	-	-	-	236	-	-	-	20,478	1,086	-
2b.1.3	Totals	5,701	3,143	159	498	4,287	1,828	-	4,827	20,443	20,443	-	-	51,247	9,710	-	-	-	2,881,569	145,859	-
2b.1	Subtotal Period 2b Activity Costs	6,673	12,012	467	1,093	10,240	4,006	-	9,087	43,578	43,568	-	-	9	122,269	17,682	-	-	6,296,255	296,899	-
Period 2b Additional Costs																					
2b.2.1	Remedial Action Surveys	-	-	-	-	-	-	2,259	678	2,936	2,936	-	-	-	-	-	-	-	-	46,242	-
2b.2.2	Operational Equipment	-	-	17	66	603	-	-	102	788	788	-	-	11,710	-	-	-	-	292,750	32	-
2b.2	Subtotal Period 2b Additional Costs	-	-	17	66	603	-	2,259	780	3,724	3,724	-	-	11,710	-	-	-	-	292,750	46,274	-
Period 2b Collateral Costs																					
2b.3.1	Process decommissioning water waste	172	-	115	291	-	501	-	266	1,345	1,345	-	-	-	1,127	-	-	-	67,647	220	-
2b.3.2	Process decommissioning chemical flush waste	1	-	41	147	-	326	-	108	623	623	-	-	-	413	-	-	-	43,978	77	-
2b.3.3	Small tool allowance	-	286	-	-	-	-	-	43	329	329	-	-	-	-	-	-	-	-	-	-
2b.3.4	Spent Fuel Capital and Transfer	-	-	-	-	-	-	29,013	4,352	33,365	-	33,365	-	-	-	-	-	-	-	-	-
2b.3.5	On-site survey and release of 0.0 tons clean metallic waste	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2b.3	Subtotal Period 2b Collateral Costs	173	286	156	438	-	827	29,013	4,769	35,662	2,297	33,365	-	-	1,540	-	-	-	111,625	297	-
Period 2b Period-Dependent Costs																					
2b.4.1	Decon supplies	1,063	-	-	-	-	-	-	266	1,328	1,328	-	-	-	-	-	-	-	-	-	-
2b.4.2	Insurance	-	-	-	-	-	-	1,306	131	1,437	1,437	-	-	-	-	-	-	-	-	-	-
2b.4.3	Property taxes	-	-	-	-	-	-	5,191	519	5,710	5,710	-	-	-	-	-	-	-	-	-	-
2b.4.4	Health physics supplies	-	2,659	-	-	-	-	-	665	3,324	3,324	-	-	-	-	-	-	-	-	-	-
2b.4.5	Heavy equipment rental	-	4,472	-	-	-	-	-	671	5,143	5,143	-	-	-	-	-	-	-	-	-	-
2b.4.6	Disposal of DAW generated	-	-	121	42	-	456	-	132	752	752	-	-	-	5,805	-	-	-	116,095	189	-
2b.4.7	Plant energy budget	-	-	-	-	-	-	5,890	883	6,773	6,773	-	-	-	-	-	-	-	-	-	-
2b.4.8	NRC Fees	-	-	-	-	-	-	1,393	139	1,532	1,532	-	-	-	-	-	-	-	-	-	-
2b.4.9	Emergency Planning Fees	-	-	-	-	-	-	5,714	571	6,285	-	6,285	-	-	-	-	-	-	-	-	-
2b.4.10	Fixed Overhead	-	-	-	-	-	-	4,133	620	4,753	4,753	-	-	-	-	-	-	-	-	-	-
2b.4.11	Spent Fuel Pool O&M	-	-	-	-	-	-	1,760	264	2,024	-	2,024	-	-	-	-	-	-	-	-	-
2b.4.12	Liquid Radwaste Processing Equipment/Services	-	-	-	-	-	-	446	67	513	513	-	-	-	-	-	-	-	-	-	-
2b.4.13	ISFSI Operating Costs	-	-	-	-	-	-	212	32	244	-	244	-	-	-	-	-	-	-	-	-
2b.4.14	Railroad Track Maintenance	-	-	-	-	-	-	237	36	273	273	-	-	-	-	-	-	-	-	-	-
2b.4.15	Security Staff Cost	-	-	-	-	-	-	10,090	1,514	11,604	11,604	-	-	-	-	-	-	-	-	-	293,480
2b.4.16	DOC Staff Cost	-	-	-	-	-	-	24,752	3,713	28,465	28,465	-	-	-	-	-	-	-	-	-	338,720
2b.4.17	Utility Staff Cost	-	-	-	-	-	-	34,504	5,176	39,680	39,680	-	-	-	-	-	-	-	-	-	628,720
2b.4	Subtotal Period 2b Period-Dependent Costs	1,063	7,131	121	42	-	456	95,629	15,398	119,840	111,287	8,553	-	-	5,805	-	-	-	116,095	189	1,260,920
2b.0	TOTAL PERIOD 2b COST	7,908	19,430	762	1,639	10,843	5,289	126,900	30,033	202,804	160,877	41,918	9	133,979	25,027	-	-	-	6,816,725	343,660	1,260,920

Monticello Nuclear Generating Plant
Decommissioning Cost Analysis

Table F
Monticello Nuclear Generating Plant
DECON 200 YR Fuel Storage with Recasking Decommissioning Cost Estimate
(Thousands of 2014 Dollars)

Activity Index	Activity Description	Decon Cost	Removal Cost	Packaging Costs	Transport Costs	Off-Site Processing Costs	LLRW Disposal Costs	Other Costs	Total Contingency	Total Costs	NRC Lic. Term. Costs	Spent Fuel Management Costs	Site Restoration Costs	Processed Volume Cu. Feet	Burial Volumes				Burial / Processed Wt., Lbs.	Craft Manhours	Utility and Contractor Manhours
															Class A Cu. Feet	Class B Cu. Feet	Class C Cu. Feet	GTCC Cu. Feet			
PERIOD 2c - Spent fuel delay prior to SFP decon																					
Period 2c Direct Decommissioning Activities																					
Period 2c Collateral Costs																					
2c.3.1	Spent Fuel Capital and Transfer	-	-	-	-	-	-	33,471	5,021	38,492	-	38,492	-	-	-	-	-	-	-	-	-
2c.3	Subtotal Period 2c Collateral Costs	-	-	-	-	-	-	33,471	5,021	38,492	-	38,492	-	-	-	-	-	-	-	-	-
Period 2c Period-Dependent Costs																					
2c.4.1	Insurance	-	-	-	-	-	-	5,848	585	6,432	6,432	-	-	-	-	-	-	-	-	-	-
2c.4.2	Property taxes	-	-	-	-	-	-	15,696	1,570	17,265	17,265	-	-	-	-	-	-	-	-	-	-
2c.4.3	Health physics supplies	-	1,958	-	-	-	-	-	490	2,448	2,448	-	-	-	-	-	-	-	-	-	-
2c.4.4	Disposal of DAW generated	-	-	86	30	-	323	-	94	532	532	-	-	-	4,110	-	-	-	82,199	134	-
2c.4.5	Plant energy budget	-	-	-	-	-	-	7,033	1,055	8,088	8,088	-	-	-	-	-	-	-	-	-	-
2c.4.6	NRC Fees	-	-	-	-	-	-	2,883	288	3,171	3,171	-	-	-	-	-	-	-	-	-	-
2c.4.7	Emergency Planning Fees	-	-	-	-	-	-	25,586	2,559	28,145	-	28,145	-	-	-	-	-	-	-	-	-
2c.4.8	Fixed Overhead	-	-	-	-	-	-	18,508	2,776	21,285	21,285	-	-	-	-	-	-	-	-	-	-
2c.4.9	Spent Fuel Pool O&M	-	-	-	-	-	-	7,880	1,182	9,062	-	9,062	-	-	-	-	-	-	-	-	-
2c.4.10	Liquid Radwaste Processing Equipment/Services	-	-	-	-	-	-	399	60	459	459	-	-	-	-	-	-	-	-	-	-
2c.4.11	ISFSI Operating Costs	-	-	-	-	-	-	951	143	1,094	-	1,094	-	-	-	-	-	-	-	-	-
2c.4.12	Railroad Track Maintenance	-	-	-	-	-	-	1,063	159	1,222	1,222	-	-	-	-	-	-	-	-	-	-
2c.4.13	Security Staff Cost	-	-	-	-	-	-	38,571	5,786	44,356	22,178	22,178	-	-	-	-	-	-	-	-	1,106,383
2c.4.14	Utility Staff Cost	-	-	-	-	-	-	44,188	6,628	50,817	25,408	25,408	-	-	-	-	-	-	-	-	820,697
2c.4	Subtotal Period 2c Period-Dependent Costs	-	1,958	86	30	-	323	168,606	23,374	194,376	108,489	85,887	-	-	4,110	-	-	-	82,199	134	1,927,080
2c.0	TOTAL PERIOD 2c COST	-	1,958	86	30	-	323	202,077	28,394	232,868	108,489	124,380	-	-	4,110	-	-	-	82,199	134	1,927,080
PERIOD 2d - Decontamination Following Wet Fuel Storage																					
Period 2d Direct Decommissioning Activities																					
2d.1.1	Remove spent fuel racks	557	49	108	116	-	2,099	-	844	3,772	3,772	-	-	-	7,653	-	-	-	505,842	906	-
Disposal of Plant Systems																					
2d.1.2.1	Cranes/Heavy Loads/Rigging - RCA	-	3	0	1	9	-	-	2	14	14	-	-	103	-	-	-	-	4,184	48	-
2d.1.2.2	Electrical - Contaminated Fuel Pool	-	38	1	2	20	2	-	14	77	77	-	-	240	9	-	-	-	10,357	665	-
2d.1.2.3	Electrical - Decontam. Fuel Pool Area	-	242	4	16	206	-	-	94	562	562	-	-	2,457	-	-	-	-	99,783	4,090	-
2d.1.2.4	Fire - RCA - Fuel Pool Area	-	9	0	0	5	-	-	3	18	18	-	-	62	-	-	-	-	2,499	143	-
2d.1.2.5	Fuel Pool Cooling & Cleanup	210	354	33	28	99	368	-	308	1,399	1,399	-	-	1,179	1,341	-	-	-	136,502	8,380	-
2d.1.2.6	Fuel Pool Cooling & Cleanup - Insulated	23	34	3	2	6	32	-	30	129	129	-	-	67	117	-	-	-	10,447	848	-
2d.1.2.7	HVAC Ductwork - Fuel Pool Area	-	29	1	2	25	3	-	12	72	72	-	-	296	11	-	-	-	12,762	457	-
2d.1.2.8	HVAC/Chilled Water - RCA Fuel Pool Area	-	27	0	1	19	-	-	10	57	57	-	-	223	-	-	-	-	9,072	397	-
2d.1.2.9	Instrument & Service Air-RCA-Fuel Pool	-	24	0	2	22	-	-	10	58	58	-	-	267	-	-	-	-	10,841	357	-
2d.1.2	Totals	233	760	42	55	409	405	-	482	2,386	2,386	-	-	4,894	1,479	-	-	-	296,447	15,385	-
Decontamination of Site Buildings																					
2d.1.3.1	Reactor (Post Fuel)	791	2,225	89	642	165	8,016	-	3,086	15,012	15,012	-	-	1,969	43,028	-	-	-	2,677,024	45,625	-
2d.1.3	Totals	791	2,225	89	642	165	8,016	-	3,086	15,012	15,012	-	-	1,969	43,028	-	-	-	2,677,024	45,625	-
2d.1.4	Scaffolding in support of decommissioning	-	478	6	2	24	6	-	126	642	642	-	-	257	23	-	-	-	13,086	5,641	-
2d.1	Subtotal Period 2d Activity Costs	1,581	3,511	245	815	598	10,527	-	4,536	21,813	21,813	-	-	7,120	52,182	-	-	-	3,492,399	67,557	-
Period 2d Additional Costs																					
2d.2.1	License Termination Survey Planning	-	-	-	-	-	-	1,104	331	1,435	1,435	-	-	-	-	-	-	-	-	-	12,480
2d.2.2	Remedial Action Surveys	-	-	-	-	-	-	765	229	994	994	-	-	-	-	-	-	-	-	15,661	-
2d.2	Subtotal Period 2d Additional Costs	-	-	-	-	-	-	1,868	561	2,429	2,429	-	-	-	-	-	-	-	-	15,661	12,480
Period 2d Collateral Costs																					
2d.3.1	Process decommissioning water waste	26	-	21	52	-	90	-	45	235	235	-	-	-	204	-	-	-	12,210	40	-
2d.3.2	Process decommissioning chemical flush waste	1	-	25	89	-	197	-	65	376	376	-	-	-	249	-	-	-	26,553	47	-
2d.3.3	Small tool allowance	-	74	-	-	-	-	-	11	86	86	-	-	-	-	-	-	-	-	-	-
2d.3.4	Decommissioning Equipment Disposition	-	-	137	62	556	145	-	143	1,043	1,043	-	-	6,000	529	-	-	-	304,968	88	-
2d.3.5	Spent Fuel Capital and Transfer	-	-	-	-	-	-	11,181	1,677	12,859	-	12,859	-	-	-	-	-	-	-	-	-
2d.3	Subtotal Period 2d Collateral Costs	26	74	182	203	556	432	11,181	1,942	14,598	1,739	12,859	-	6,000	982	-	-	-	343,731	174	-

Monticello Nuclear Generating Plant
Decommissioning Cost Analysis

Table F
Monticello Nuclear Generating Plant
DECON 200 YR Fuel Storage with Recasking Decommissioning Cost Estimate
(Thousands of 2014 Dollars)

Activity Index	Activity Description	Decon Cost	Removal Cost	Packaging Costs	Transport Costs	Off-Site Processing Costs	LLRW Disposal Costs	Other Costs	Total Contingency	Total Costs	NRC Lic. Term. Costs	Spent Fuel Management Costs	Site Restoration Costs	Processed Volume Cu. Feet	Burial Volumes				Burial / Processed Wt., Lbs.	Craft Manhours	Utility and Contractor Manhours
															Class A Cu. Feet	Class B Cu. Feet	Class C Cu. Feet	GTCC Cu. Feet			
Period 2d Period-Dependent Costs																					
2d.4.1	Decon supplies	169	-	-	-	-	-	-	42	212	212	-	-	-	-	-	-	-	-	-	-
2d.4.2	Insurance	-	-	-	-	-	-	442	44	487	487	-	-	-	-	-	-	-	-	-	-
2d.4.3	Property taxes	-	-	-	-	-	-	686	69	755	755	-	-	-	-	-	-	-	-	-	-
2d.4.4	Health physics supplies	-	714	-	-	-	-	-	178	892	892	-	-	-	-	-	-	-	-	-	-
2d.4.5	Heavy equipment rental	-	1,515	-	-	-	-	-	227	1,742	1,742	-	-	-	-	-	-	-	-	-	-
2d.4.6	Disposal of DAW generated	-	-	42	15	-	160	-	46	263	263	-	-	-	2,030	-	-	-	40,600	66	-
2d.4.7	Plant energy budget	-	-	-	-	-	-	1,064	160	1,223	1,223	-	-	-	-	-	-	-	-	-	-
2d.4.8	NRC Fees	-	-	-	-	-	-	401	40	441	441	-	-	-	-	-	-	-	-	-	-
2d.4.9	Emergency Planning Fees	-	-	-	-	-	-	1,935	194	2,129	-	2,129	-	-	-	-	-	-	-	-	-
2d.4.10	Fixed Overhead	-	-	-	-	-	-	1,400	210	1,610	1,610	-	-	-	-	-	-	-	-	-	-
2d.4.11	Liquid Radwaste Processing Equipment/Services	-	-	-	-	-	-	302	45	347	347	-	-	-	-	-	-	-	-	-	-
2d.4.12	ISFSI Operating Costs	-	-	-	-	-	-	72	11	83	-	83	-	-	-	-	-	-	-	-	-
2d.4.13	Railroad Track Maintenance	-	-	-	-	-	-	80	12	92	92	-	-	-	-	-	-	-	-	-	-
2d.4.14	Security Staff Cost	-	-	-	-	-	-	1,917	288	2,205	2,205	-	-	-	-	-	-	-	-	-	52,250
2d.4.15	DOC Staff Cost	-	-	-	-	-	-	5,802	870	6,672	6,672	-	-	-	-	-	-	-	-	-	78,571
2d.4.16	Utility Staff Cost	-	-	-	-	-	-	8,686	1,303	9,989	9,989	-	-	-	-	-	-	-	-	-	150,071
2d.4	Subtotal Period 2d Period-Dependent Costs	169	2,229	42	15	-	160	22,788	3,739	29,142	26,931	2,211	-	-	2,030	-	-	-	40,600	66	280,893
2d.0	TOTAL PERIOD 2d COST	1,777	5,814	469	1,033	1,154	11,118	35,838	10,778	67,982	52,912	15,070	-	13,120	55,194	-	-	-	3,876,730	83,458	293,373
PERIOD 2f - License Termination																					
Period 2f Direct Decommissioning Activities																					
2f.1.1	ORISE confirmatory survey	-	-	-	-	-	-	163	49	212	212	-	-	-	-	-	-	-	-	-	-
2f.1.2	Terminate license	-	-	-	-	-	-	-	-	a	-	-	-	-	-	-	-	-	-	-	-
2f.1	Subtotal Period 2f Activity Costs	-	-	-	-	-	-	163	49	212	212	-	-	-	-	-	-	-	-	-	-
Period 2f Additional Costs																					
2f.2.1	License Termination Survey	-	-	-	-	-	-	5,936	1,781	7,717	7,717	-	-	-	-	-	-	-	-	96,197	6,240
2f.2	Subtotal Period 2f Additional Costs	-	-	-	-	-	-	5,936	1,781	7,717	7,717	-	-	-	-	-	-	-	-	96,197	6,240
Period 2f Collateral Costs																					
2f.3.1	DOC staff relocation expenses	-	-	-	-	-	-	1,708	256	1,964	1,964	-	-	-	-	-	-	-	-	-	-
2f.3.2	Spent Fuel Capital and Transfer	-	-	-	-	-	-	40	6	46	-	46	-	-	-	-	-	-	-	-	-
2f.3	Subtotal Period 2f Collateral Costs	-	-	-	-	-	-	1,748	262	2,010	1,964	46	-	-	-	-	-	-	-	-	-
Period 2f Period-Dependent Costs																					
2f.4.1	Insurance	-	-	-	-	-	-	415	42	457	457	-	-	-	-	-	-	-	-	-	-
2f.4.2	Property taxes	-	-	-	-	-	-	624	62	686	686	-	-	-	-	-	-	-	-	-	-
2f.4.3	Health physics supplies	-	568	-	-	-	-	-	142	710	710	-	-	-	-	-	-	-	-	-	-
2f.4.4	Disposal of DAW generated	-	-	7	3	-	28	-	8	46	46	-	-	-	355	-	-	-	7,097	12	-
2f.4.5	Plant energy budget	-	-	-	-	-	-	532	80	612	612	-	-	-	-	-	-	-	-	-	-
2f.4.6	NRC Fees	-	-	-	-	-	-	455	46	501	501	-	-	-	-	-	-	-	-	-	-
2f.4.7	Emergency Planning Fees	-	-	-	-	-	-	241	24	265	-	265	-	-	-	-	-	-	-	-	-
2f.4.8	Fixed Overhead	-	-	-	-	-	-	1,400	210	1,610	1,610	-	-	-	-	-	-	-	-	-	-
2f.4.9	ISFSI Operating Costs	-	-	-	-	-	-	72	11	83	-	83	-	-	-	-	-	-	-	-	-
2f.4.10	Railroad Track Maintenance	-	-	-	-	-	-	80	12	92	92	-	-	-	-	-	-	-	-	-	-
2f.4.11	Security Staff Cost	-	-	-	-	-	-	1,880	282	2,162	2,162	-	-	-	-	-	-	-	-	-	51,071
2f.4.12	DOC Staff Cost	-	-	-	-	-	-	4,394	659	5,053	5,053	-	-	-	-	-	-	-	-	-	57,357
2f.4.13	Utility Staff Cost	-	-	-	-	-	-	4,918	738	5,656	5,656	-	-	-	-	-	-	-	-	-	80,929
2f.4	Subtotal Period 2f Period-Dependent Costs	-	568	7	3	-	28	15,011	2,315	17,932	17,584	348	-	-	355	-	-	-	7,097	12	189,357
2f.0	TOTAL PERIOD 2f COST	-	568	7	3	-	28	22,858	4,407	27,871	27,477	394	-	-	355	-	-	-	7,097	96,208	195,597
PERIOD 2 TOTALS		11,328	55,263	22,575	9,203	25,033	53,570	448,775	118,189	743,936	556,575	186,931	431	288,652	146,282	1,481	1,010	-	21,672,880	804,794	4,454,318

Monticello Nuclear Generating Plant
Decommissioning Cost Analysis

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Table F
Monticello Nuclear Generating Plant
DECON 200 YR Fuel Storage with Recasking Decommissioning Cost Estimate
(Thousands of 2014 Dollars)

Activity Index	Activity Description	Decon Cost	Removal Cost	Packaging Costs	Transport Costs	Off-Site Processing Costs	LLRW Disposal Costs	Other Costs	Total Contingency	Total Costs	NRC Lic. Term. Costs	Spent Fuel Management Costs	Site Restoration Costs	Processed Volume Cu. Feet	Burial Volumes				Burial / Processed Wt., Lbs.	Craft Manhours	Utility and Contractor Manhours
															Class A Cu. Feet	Class B Cu. Feet	Class C Cu. Feet	GTCC Cu. Feet			
PERIOD 3b - Site Restoration																					
Period 3b Direct Decommissioning Activities																					
Demolition of Remaining Site Buildings																					
3b.1.1.1	Reactor Building	-	3,541	-	-	-	-	-	531	4,073	-	-	4,073	-	-	-	-	-	-	36,752	-
3b.1.1.2	Condensate Tanks Foundation	-	19	-	-	-	-	-	3	22	-	-	22	-	-	-	-	-	-	219	-
3b.1.1.3	Discharge Retention Basin	-	9	-	-	-	-	-	1	10	-	-	10	-	-	-	-	-	-	110	-
3b.1.1.4	HPCI Room	-	44	-	-	-	-	-	7	50	-	-	50	-	-	-	-	-	-	401	-
3b.1.1.5	Hot Shop	-	21	-	-	-	-	-	3	24	-	-	24	-	-	-	-	-	-	298	-
3b.1.1.6	Hydrogen & Oxygen Storage	-	2	-	-	-	-	-	0	2	-	-	2	-	-	-	-	-	-	21	-
3b.1.1.7	LLRW Storage & Shipping	-	140	-	-	-	-	-	21	161	-	-	161	-	-	-	-	-	-	1,794	-
3b.1.1.8	MSIV	-	4	-	-	-	-	-	1	5	-	-	5	-	-	-	-	-	-	59	-
3b.1.1.9	Offgas Stack	-	232	-	-	-	-	-	35	267	-	-	267	-	-	-	-	-	-	2,668	-
3b.1.1.10	Offgas Storage & Compressor	-	88	-	-	-	-	-	13	101	-	-	101	-	-	-	-	-	-	963	-
3b.1.1.11	Radwaste	-	482	-	-	-	-	-	72	554	-	-	554	-	-	-	-	-	-	5,196	-
3b.1.1.12	Recombiner	-	258	-	-	-	-	-	39	297	-	-	297	-	-	-	-	-	-	2,490	-
3b.1.1.13	Security Barrier	-	362	-	-	-	-	-	54	416	-	-	416	-	-	-	-	-	-	4,083	-
3b.1.1.14	Tank Farm	-	10	-	-	-	-	-	1	11	-	-	11	-	-	-	-	-	-	121	-
3b.1.1.15	Turbine	-	1,514	-	-	-	-	-	227	1,741	-	-	1,741	-	-	-	-	-	-	18,764	-
3b.1.1.16	Turbine Building Addition	-	67	-	-	-	-	-	10	77	-	-	77	-	-	-	-	-	-	971	-
3b.1.1.17	Turbine Pedestal	-	415	-	-	-	-	-	62	478	-	-	478	-	-	-	-	-	-	3,762	-
3b.1.1	Totals	-	7,207	-	-	-	-	-	1,081	8,288	-	-	8,288	-	-	-	-	-	-	78,674	-
Site Closeout Activities																					
3b.1.2	BackFill Site	-	302	-	-	-	-	-	45	347	-	-	347	-	-	-	-	-	-	542	-
3b.1.3	Grade & landscape site	-	864	-	-	-	-	-	130	994	-	-	994	-	-	-	-	-	-	1,841	-
3b.1.4	Final report to NRC	-	-	-	-	-	-	177	27	204	204	-	-	-	-	-	-	-	-	-	1,560
3b.1	Subtotal Period 3b Activity Costs	-	8,374	-	-	-	-	177	1,283	9,833	204	-	9,630	-	-	-	-	-	-	81,057	1,560
Period 3b Additional Costs																					
3b.2.1	Concrete Crushing	-	292	-	-	-	-	9	45	347	-	-	347	-	-	-	-	-	-	1,387	-
3b.2.2	Excavation of Underground Services	-	1,402	-	-	-	-	705	316	2,424	-	-	2,424	-	-	-	-	-	-	13,475	-
3b.2.3	Intake Structure cofferdam	-	285	-	-	-	-	-	43	328	-	-	328	-	-	-	-	-	-	2,540	-
3b.2	Subtotal Period 3b Additional Costs	-	1,980	-	-	-	-	715	404	3,099	-	-	3,099	-	-	-	-	-	-	17,402	-
Period 3b Collateral Costs																					
3b.3.1	Small tool allowance	-	91	-	-	-	-	-	14	105	-	-	105	-	-	-	-	-	-	-	-
3b.3.2	Spent Fuel Capital and Transfer	-	-	-	-	-	-	2,231	335	2,566	-	2,566	-	-	-	-	-	-	-	-	-
3b.3.3	Railroad Track Maintenance SR	-	-	-	-	-	-	185	28	213	-	-	213	-	-	-	-	-	-	-	-
3b.3	Subtotal Period 3b Collateral Costs	-	91	-	-	-	-	2,416	376	2,883	-	2,566	317	-	-	-	-	-	-	-	-
Period 3b Period-Dependent Costs																					
3b.4.1	Insurance	-	-	-	-	-	-	956	96	1,052	-	1,052	-	-	-	-	-	-	-	-	-
3b.4.2	Property taxes	-	-	-	-	-	-	1,159	116	1,274	(0)	1,160	115	-	-	-	-	-	-	-	-
3b.4.3	Heavy equipment rental	-	4,953	-	-	-	-	-	743	5,696	-	-	5,696	-	-	-	-	-	-	-	-
3b.4.4	Plant energy budget	-	-	-	-	-	-	612	92	704	-	-	704	-	-	-	-	-	-	-	-
3b.4.5	NRC ISFSI Fees	-	-	-	-	-	-	440	44	484	-	484	-	-	-	-	-	-	-	-	-
3b.4.6	Emergency Planning Fees	-	-	-	-	-	-	555	55	610	-	610	-	-	-	-	-	-	-	-	-
3b.4.7	ISFSI Operating Costs	-	-	-	-	-	-	166	25	190	-	190	-	-	-	-	-	-	-	-	-
3b.4.8	Fixed Overhead SR	-	-	-	-	-	-	873	131	1,004	-	-	1,004	-	-	-	-	-	-	-	-
3b.4.9	Security Staff Cost	-	-	-	-	-	-	4,327	649	4,976	0	4,229	746	-	-	-	-	-	-	-	117,557
3b.4.10	DOC Staff Cost	-	-	-	-	-	-	9,599	1,440	11,039	-	-	11,039	-	-	-	-	-	-	-	122,983
3b.4.11	Utility Staff Cost	-	-	-	-	-	-	6,284	943	7,226	0	1,518	5,709	-	-	-	-	-	-	-	98,567
3b.4	Subtotal Period 3b Period-Dependent Costs	-	4,953	-	-	-	-	24,970	4,333	34,256	0	9,243	25,013	-	-	-	-	-	-	-	339,107
3b.0	TOTAL PERIOD 3b COST	-	15,397	-	-	-	-	28,278	6,396	50,071	204	11,809	38,059	-	-	-	-	-	-	98,459	340,667
PERIOD 3c - Fuel Storage Operations/Shipping																					
Period 3c Direct Decommissioning Activities																					
Period 3c Additional Costs																					
3c.2.1	ISFSI Disposition of Retired MPC Canisters	-	-	-	2,027	-	27,144	-	6,989	36,159	-	36,159	-	-	87,933	-	-	-	8,793,328	-	-
3c.2	Subtotal Period 3c Additional Costs	-	-	-	2,027	-	27,144	-	6,989	36,159	-	36,159	-	-	87,933	-	-	-	8,793,328	-	-

Monticello Nuclear Generating Plant
Decommissioning Cost Analysis

Table F
Monticello Nuclear Generating Plant
DECON 200 YR Fuel Storage with Recasking Decommissioning Cost Estimate
(Thousands of 2014 Dollars)

Activity Index	Activity Description	Decon Cost	Removal Cost	Packaging Costs	Transport Costs	Off-Site Processing Costs	LLRW Disposal Costs	Other Costs	Total Contingency	Total Costs	NRC Lic. Term. Costs	Spent Fuel Management Costs	Site Restoration Costs	Processed Volume Cu. Feet	Burial Volumes				Burial / Processed Wt., Lbs.	Craft Manhours	Utility and Contractor Manhours
															Class A Cu. Feet	Class B Cu. Feet	Class C Cu. Feet	GTCC Cu. Feet			
Period 3c Collateral Costs																					
3c.3.1	Spent Fuel Capital and Transfer	-	-	-	-	-	-	1,309,066	196,360	1,505,426	-	1,505,426	-	-	-	-	-	-	-	-	-
3c.3	Subtotal Period 3c Collateral Costs	-	-	-	-	-	-	1,309,066	196,360	1,505,426	-	1,505,426	-	-	-	-	-	-	-	-	-
Period 3c Period-Dependent Costs																					
3c.4.1	Insurance	-	-	-	-	-	-	92,715	9,271	101,986	-	101,986	-	-	-	-	-	-	-	-	-
3c.4.2	Property taxes	-	-	-	-	-	-	102,714	10,271	112,986	-	112,986	-	-	-	-	-	-	-	-	-
3c.4.3	Plant energy budget	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
3c.4.4	NRC ISFSI Fees	-	-	-	-	-	-	42,665	4,267	46,932	-	46,932	-	-	-	-	-	-	-	-	-
3c.4.5	Emergency Planning Fees	-	-	-	-	-	-	53,820	5,382	59,202	-	59,202	-	-	-	-	-	-	-	-	-
3c.4.6	Fixed Overhead	-	-	-	-	-	-	84,651	12,698	97,349	-	97,349	-	-	-	-	-	-	-	-	-
3c.4.7	ISFSI Operating Costs	-	-	-	-	-	-	16,058	2,409	18,467	-	18,467	-	-	-	-	-	-	-	-	-
3c.4.8	Security Staff Cost	-	-	-	-	-	-	358,219	53,733	411,952	-	411,952	-	-	-	-	-	-	-	-	9,471,291
3c.4.9	DOC Staff Cost	-	-	-	-	-	-	472,442	70,866	543,308	-	543,308	-	-	-	-	-	-	-	-	6,664,983
3c.4.10	Utility Staff Cost	-	-	-	-	-	-	111,174	16,676	127,850	-	127,850	-	-	-	-	-	-	-	-	2,280,126
3c.4	Subtotal Period 3c Period-Dependent Costs	-	-	-	-	-	-	1,334,459	185,573	1,520,032	-	1,520,032	-	-	-	-	-	-	-	-	18,416,400
3c.0	TOTAL PERIOD 3c COST	-	-	-	2,027	-	27,144	2,643,526	388,922	3,061,618	-	3,061,618	-	-	87,933	-	-	-	8,793,328	-	18,416,400
PERIOD 3d - GTCC shipping																					
Period 3d Direct Decommissioning Activities																					
Nuclear Steam Supply System Removal																					
3d.1.1.1	Vessel & Internals GTCC Disposal	-	-	1,462	-	-	6,760	-	1,380	9,602	9,602	-	-	-	-	-	-	1,785	346,570	-	-
3d.1.1	Totals	-	-	1,462	-	-	6,760	-	1,380	9,602	9,602	-	-	-	-	-	-	1,785	346,570	-	-
3d.1	Subtotal Period 3d Activity Costs	-	-	1,462	-	-	6,760	-	1,380	9,602	9,602	-	-	-	-	-	-	1,785	346,570	-	-
Period 3d Collateral Costs																					
3d.3.1	Spent Fuel Capital and Transfer	-	-	-	-	-	-	19,595	2,939	22,535	-	22,535	-	-	-	-	-	-	-	-	-
3d.3	Subtotal Period 3d Collateral Costs	-	-	-	-	-	-	19,595	2,939	22,535	-	22,535	-	-	-	-	-	-	-	-	-
Period 3d Period-Dependent Costs																					
3d.4.1	Insurance	-	-	-	-	-	-	7,722	772	8,494	-	8,494	-	-	-	-	-	-	-	-	-
3d.4.2	Property taxes	-	-	-	-	-	-	8,556	856	9,411	-	9,411	-	-	-	-	-	-	-	-	-
3d.4.3	Plant energy budget	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
3d.4.4	NRC ISFSI Fees	-	-	-	-	-	-	5,089	509	5,597	-	5,597	-	-	-	-	-	-	-	-	-
3d.4.5	Emergency Planning Fees	-	-	-	-	-	-	4,483	448	4,931	-	4,931	-	-	-	-	-	-	-	-	-
3d.4.6	Fixed Overhead	-	-	-	-	-	-	7,051	1,058	8,108	-	8,108	-	-	-	-	-	-	-	-	-
3d.4.7	ISFSI Operating Costs	-	-	-	-	-	-	1,338	201	1,538	-	1,538	-	-	-	-	-	-	-	-	-
3d.4.8	Railroad Track Maintenance	-	-	-	-	-	-	1,777	267	2,044	-	2,044	-	-	-	-	-	-	-	-	-
3d.4.9	Security Staff Cost	-	-	-	-	-	-	29,836	4,475	34,311	-	34,311	-	-	-	-	-	-	-	-	788,863
3d.4.10	Utility Staff Cost	-	-	-	-	-	-	10,727	1,609	12,336	-	12,336	-	-	-	-	-	-	-	-	197,216
3d.4	Subtotal Period 3d Period-Dependent Costs	-	-	-	-	-	-	76,577	10,194	86,772	-	86,772	-	-	-	-	-	-	-	-	986,079
3d.0	TOTAL PERIOD 3d COST	-	-	1,462	-	-	6,760	96,173	14,513	118,908	9,602	109,306	-	-	-	-	-	1,785	346,570	-	986,079
PERIOD 3e - ISFSI Decontamination																					
Period 3e Direct Decommissioning Activities																					
Period 3e Additional Costs																					
3e.2.1	Decommissioning of ISFSI	28	196	7	361	-	2,758	1,977	1,332	6,658	6,658	-	-	-	15,473	-	-	-	1,669,366	12,625	1,872
3e.2	Subtotal Period 3e Additional Costs	28	196	7	361	-	2,758	1,977	1,332	6,658	6,658	-	-	-	15,473	-	-	-	1,669,366	12,625	1,872
Period 3e Collateral Costs																					
3e.3	Subtotal Period 3e Collateral Costs	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Period 3e Period-Dependent Costs																					
3e.4.1	Insurance	-	-	-	-	-	-	84	21	104	104	-	-	-	-	-	-	-	-	-	-
3e.4.2	Property taxes	-	-	-	-	-	-	202	51	253	253	-	-	-	-	-	-	-	-	-	-
3e.4.3	Plant energy budget	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
3e.4.4	Fixed Overhead	-	-	-	-	-	-	167	42	209	209	-	-	-	-	-	-	-	-	-	-
3e.4.5	Security Staff Cost	-	-	-	-	-	-	130	32	162	162	-	-	-	-	-	-	-	-	-	5,013
3e.4.6	Utility Staff Cost	-	-	-	-	-	-	213	53	266	266	-	-	-	-	-	-	-	-	-	3,803
3e.4	Subtotal Period 3e Period-Dependent Costs	-	-	-	-	-	-	795	199	994	994	-	-	-	-	-	-	-	-	-	8,816
3e.0	TOTAL PERIOD 3e COST	28	196	7	361	-	2,758	2,772	1,530	7,652	7,652	-	-	-	15,473	-	-	-	1,669,366	12,625	10,688

Monticello Nuclear Generating Plant
Decommissioning Cost Analysis

Table F
Monticello Nuclear Generating Plant
DECON 200 YR Fuel Storage with Recasking Decommissioning Cost Estimate
(Thousands of 2014 Dollars)

Activity Index	Activity Description	Decon Cost	Removal Cost	Packaging Costs	Transport Costs	Off-Site Processing Costs	LLRW Disposal Costs	Other Costs	Total Contingency	Total Costs	NRC Lic. Term. Costs	Spent Fuel Management Costs	Site Restoration Costs	Processed Volume Cu. Feet	Burial Volumes				Burial / Processed Wt., Lbs.	Craft Manhours	Utility and Contractor Manhours
															Class A Cu. Feet	Class B Cu. Feet	Class C Cu. Feet	GTCC Cu. Feet			
PERIOD 3f - ISFSI Site Restoration																					
Period 3f Direct Decommissioning Activities																					
Period 3f Additional Costs																					
3f.2.1	Demolition and Site Restoration of ISFSI	-	1,263	-	-	-	-	55	198	1,516	-	-	1,516	-	-	-	-	-	-	8,959	160
3f.2	Subtotal Period 3f Additional Costs	-	1,263	-	-	-	-	55	198	1,516	-	-	1,516	-	-	-	-	-	-	8,959	160
Period 3f Collateral Costs																					
3f.3.1	Small tool allowance	-	13	-	-	-	-	-	2	15	-	-	15	-	-	-	-	-	-	-	-
3f.3	Subtotal Period 3f Collateral Costs	-	13	-	-	-	-	-	2	15	-	-	15	-	-	-	-	-	-	-	-
Period 3f Period-Dependent Costs																					
3f.4.1	Insurance	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
3f.4.2	Property taxes	-	-	-	-	-	-	102	10	112	-	-	112	-	-	-	-	-	-	-	-
3f.4.3	Heavy equipment rental	-	106	-	-	-	-	-	16	121	-	-	121	-	-	-	-	-	-	-	-
3f.4.4	Plant energy budget	-	-	-	-	-	-	59	9	68	-	-	68	-	-	-	-	-	-	-	-
3f.4.5	Fixed Overhead	-	-	-	-	-	-	84	13	97	-	-	97	-	-	-	-	-	-	-	-
3f.4.6	Security Staff Cost	-	-	-	-	-	-	65	10	75	-	-	75	-	-	-	-	-	-	-	2,527
3f.4.7	Utility Staff Cost	-	-	-	-	-	-	84	13	96	-	-	96	-	-	-	-	-	-	-	1,569
3f.4	Subtotal Period 3f Period-Dependent Costs	-	106	-	-	-	-	394	70	570	-	-	570	-	-	-	-	-	-	-	4,096
3f.0	TOTAL PERIOD 3f COST	-	1,382	-	-	-	-	450	270	2,101	-	-	2,101	-	-	-	-	-	-	8,959	4,256
PERIOD 3 TOTALS		28	16,975	1,470	2,387	-	36,662	2,771,199	411,631	3,240,351	17,458	3,182,733	40,160	-	103,406	-	-	1,785	10,809,260	120,043	19,758,090
TOTAL COST TO DECOMMISSION		14,063	74,899	24,138	11,759	25,045	91,797	3,351,845	551,184	4,144,730	697,778	3,405,467	41,485	288,695	250,889	1,711	1,010	1,785	32,545,330	956,686	25,272,540

TOTAL COST TO DECOMMISSION WITH 15.34% CONTINGENCY:	\$4,144,730	thousands of 2014	dollars
TOTAL NRC LICENSE TERMINATION COST IS 16.84% OR:	\$697,778	thousands of 2014	dollars
SPENT FUEL MANAGEMENT COST IS 82.16% OR:	\$3,405,467	thousands of 2014	dollars
NON-NUCLEAR DEMOLITION COST IS 1% OR:	\$41,485	thousands of 2014	dollars
TOTAL RADWASTE VOLUME BURIED (EXCLUDING GTCC):	253,610	Cubic Feet	
TOTAL GREATER THAN CLASS C RADWASTE VOLUME GENERATED:	1,785	Cubic Feet	
TOTAL SCRAP METAL REMOVED:	15,499	Tons	
TOTAL CRAFT LABOR REQUIREMENTS:	956,686	Man-hours	

End Notes:
n/a - indicates that this activity not charged as decommissioning expense.
a - indicates that this activity performed by decommissioning staff.
0 - indicates that this value is less than 0.5 but is non-zero.
a cell containing " - " indicates a zero value

APPENDIX G
DETAILED COST ANALYSIS
ISFSI

<u>Table</u>	<u>Page</u>
G-1 Decommissioning Cost Estimate, Scenarios 1 & 2	2
G-2 Decommissioning Cost Estimate, Scenarios 3 & 4	3

Table G-1
Monticello Nuclear Generating Plant
ISFSI Decommissioning Cost Estimate - Scenarios 1 & 2
(thousands of 2014 dollars)

Activity Description	Removal Costs	Packaging Costs	Transport Costs	LLRW Disposal Costs	Other Costs	Total Costs	Burial Volume Class A (cubic feet)	Craft Manhours	Oversight and Contractor Manhours
Decommissioning Contractor									
Planning (characterization, specs and procedures)	-	-	-	-	242.8	242.8	-	-	1,096
Decontamination (activated liner and concrete removal)	193.7	3.1	357.4	2,725.7	-	3,279.9	15,284	1,680	
License Termination (radiological surveys)	-	-	-	-	1,157.5	1,157.5	-	8,700	-
Subtotal	193.7	3.1	357.4	2,725.7	1,400.3	4,680.2	15,284	10,381	1,096
Supporting Costs									
NRC and NRC Contractor Fees and Costs	-	-	-	-	383.7	383.7	-	-	776
Insurance					83.5	83.5			
Property taxes					202.6	202.6			
Fixed Overhead					166.9	166.9			
Security Staff Cost					129.9	129.9			5,013
Utility Staff Cost					212.6	212.6			3,803
Subtotal	-	-	-	-	1,179.1	1,179.1	-	-	9,592
Total (w/o contingency)	193.7	3.1	357.4	2,725.7	2,579.5	5,859.4	15,284.0	10,380.8	1,096.0
Total (w/25% contingency)	242.1	3.9	446.8	3,407.1	3,224.3	7,324.2			

The application of contingency (25%) is consistent with the evaluation criteria referenced by the NRC in NUREG-1757 ("Consolidated Decommissioning Guidance, Financial Assurance, Recordkeeping, and Timeliness," U.S. NRC's Office of Nuclear Material Safety and Safeguards, NUREG-1757, Vol. 3, Rev. 1, February 2012)

Table G-2
Monticello Nuclear Generating Plant
ISFSI Decommissioning Cost Estimate - Scenarios 3 & 4
(thousands of 2014 dollars)

Activity Description	Decontam-ination Costs	Removal Costs	Packaging Costs	Transport Costs	LLRW Disposal Costs	Other Costs	Total Costs	Burial Volume Class A (cubic feet)	Craft Manhours	Oversight and Contractor Manhours
Decommissioning Contractor										
Planning (characterization, specs and procedures)		-	-	-	-	242.8	242.8	-	-	1,096
Decontamination (activated liner and concrete removal)	28	195.6	7.2	360.7	2,757.7	-	3,349.2	15,473	2,041	
License Termination (radiological surveys)		-	-	-	-	1,350.2	1,350.2	-	10,584	-
Subtotal	28	195.6	7.2	360.7	2,757.7	1,593.0	4,942.2	15,473	12,625	1,096
Supporting Costs										
NRC and NRC Contractor Fees and Costs	-	-	-	-	-	383.7	383.7	-	-	776
Insurance						83.5	83.5			
Property taxes						202.6	202.6			
Fixed Overhead						166.9	166.9			
Security Staff Cost						129.9	129.9			5,013
Utility Staff Cost						212.6	212.6			3,803
Subtotal		-	-	-	-	1,179.1	1,179.1	-	-	9,591.7
Total (w/o contingency)	28.0	195.6	7.2	360.7	2,757.7	2,772.1	6,121.3	15,473.0	12,625.0	10,687.7
Total (w/25% contingency)	35.0	244.5	9.0	450.9	3,447.1	3,465.2	7,652.0			

The application of contingency (25%) is consistent with the evaluation criteria referenced by the NRC in NUREG-1757 ("Consolidated Decommissioning Guidance, Financial Assurance, Recordkeeping, and Timeliness," U.S. NRC's Office of Nuclear Material Safety and Safeguards, NUREG-1757, Vol. 3, Rev. 1, February 2012)

Document X01-1617-007, Rev. 0

DECOMMISSIONING COST ANALYSIS
for the
PRAIRIE ISLAND
NUCLEAR GENERATING PLANT



prepared for

Xcel Energy Services, Inc.

prepared by

TLG Services, Inc.
Bridgewater, Connecticut

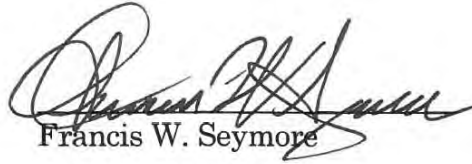
September 2014

***Prairie Island Nuclear Generating Plant
Decommissioning Cost Analysis***

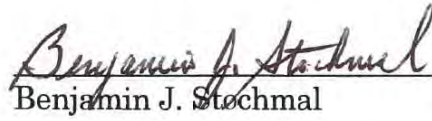
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APPROVALS

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***Prairie Island Nuclear Generating Plant
Decommissioning Cost Analysis***

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REVISION LOG

No.	Date	Item Revised	Reason for Revision
0	9-25-14		Original Issue

EXECUTIVE SUMMARY

This report presents estimates of the cost to promptly decommission the Prairie Island Nuclear Generating Plant (Prairie Island) following cessation of plant operations and the operation and eventual decommissioning of the on-site Independent Spent Fuel Storage Installation (ISFSI). The prompt decommissioning, or DECON method, as described below, was selected as it is the most cost-effective of the alternatives (in current dollars) to achieve the objectives of decommissioning. The analysis relies upon site-specific, technical information from an earlier evaluation prepared in 2011,^[1] updated to reflect current assumptions pertaining to the disposition of nuclear power plants and relevant industry experience in undertaking such projects. The costs are based on several key assumptions in areas of regulation, component characterization, high-level radioactive waste management, low-level radioactive waste disposal, performance uncertainties (contingency) and site restoration requirements.

The current estimates are designed to provide Xcel Energy with sufficient information to assess their financial obligations, as they pertain to the eventual decommissioning of the nuclear units. The analysis is not a detailed engineering document, but a financial analysis prepared in advance of the detailed engineering that will be required to carry out the decommissioning. It may also not reflect the actual plan to decommission Prairie Island; the plan may differ from the assumptions made in this analysis based on facts that exist at the time of decommissioning.

The primary goal of decommissioning is the removal and disposal of the contaminated systems and structures so that the plant's operating licenses can be terminated. This analysis recognizes that spent fuel will be stored at the site in the plant's storage pool and/or in an ISFSI until such time that it can be transferred to a U.S. Department of Energy (DOE) facility. Consequently, the estimates also include those costs to manage and subsequently decommission these storage facilities.

The Prairie Island site currently consists of two operating pressurized water reactors and an ISFSI. The currently projected cost to decommission the station assuming all spent nuclear fuel is removed by 2065 (Scenario 1) is estimated at \$1.599 billion. Costs are reported in 2014 dollars and include monies anticipated to be spent for radiological remediation and operating license termination, spent fuel

¹ "Decommissioning Cost Analysis for the Prairie Island Nuclear Generating Plant," Document No. X01-1617-005 Rev. 1, TLG Services, Inc., December 2011

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management, and site restoration activities. The costs to decommission Prairie Island for the scenarios evaluated are tabulated at the end of this section. Three additional estimates are provided for extended spent fuel storage scenarios (Scenarios 2, 3, and 4). The estimates are based on numerous fundamental assumptions, including regulatory requirements, low-level radioactive waste disposal practices, high-level radioactive waste management options, site restoration requirements, and project contingencies. The estimates incorporate a minimum cooling period for the spent fuel that resides in the storage pool when operations cease. Any residual fuel remaining in the pool after the cooling period is relocated to the ISFSI to await transfer to a DOE facility. The estimates also include the dismantling of site structures and non-essential facilities and the limited restoration of the site.

The cost estimates assume that the shutdown dates of the nuclear units are scheduled and pre-planned (i.e., there is no delay in transitioning the plant and workforce from operations or in obtaining regulatory relief from operating requirements, etc.). The estimates include the continued operation of the fuel handling area of the auxiliary building as a wet fuel storage facility for approximately 15 years after Unit 2 operations cease. During this time period, it is assumed that the spent fuel residing in the pool will be transferred to an independent spent fuel storage installation (ISFSI) located on the site. The ISFSI will remain operational until the spent fuel is transferred to an appropriate disposal facility. ^[2]

A complete discussion of the assumptions relied upon in this analysis is provided in Section 3, along with schedules of annual expenditures for each scenario. A sequence of significant project activities is provided in Section 4 with a timeline for each scenario. Detailed cost reports used to generate the summary tables contained within this document are provided in Appendices C through F.

Alternatives and Regulations

The ultimate objective of the decommissioning process is to reduce the inventory of contaminated and activated material so that the license(s) can be terminated. The Nuclear Regulatory Commission (NRC or Commission) provided general decommissioning requirements in its rule adopted on June 27, 1988.^[3] In this rule, the

² Projected expenditures for spent fuel management identified in the cost analyses do not consider credit for DOE's payment of damages to Xcel Energy for DOE's failure to perform under the terms of the disposal contract between DOE and Xcel Energy.

³ U.S. Code of Federal Regulations, Title 10, Parts 30, 40, 50, 51, 70 and 72 "General Requirements for Decommissioning Nuclear Facilities," Nuclear Regulatory Commission, Federal Register Volume 53, Number 123 (p 24018 et seq.), June 27, 1988

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NRC set forth technical and financial criteria for decommissioning licensed nuclear power facilities. The regulations addressed planning needs, timing, funding methods, and environmental review requirements for decommissioning. The rule also defined three decommissioning alternatives as being acceptable to the NRC: DECON, SAFSTOR, and ENTOMB.

DECON is defined as "the alternative in which the equipment, structures, and portions of a facility and site containing radioactive contaminants are removed or decontaminated to a level that permits the property to be released for unrestricted use shortly after cessation of operations."^[4]

SAFSTOR is defined as "the alternative in which the nuclear facility is placed and maintained in a condition that allows the nuclear facility to be safely stored and subsequently decontaminated (deferred decontamination) to levels that permit release for unrestricted use."^[5] Decommissioning is required to be completed within 60 years, although longer time periods will be considered when necessary to protect public health and safety.

ENTOMB is defined as "the alternative in which radioactive contaminants are encased in a structurally long-lived material, such as concrete; the entombed structure is appropriately maintained and continued surveillance is carried out until the radioactive material decays to a level permitting unrestricted release of the property."^[6] As with the SAFSTOR alternative, decommissioning is currently required to be completed within 60 years, although longer time periods will be considered when necessary to protect public health and safety.

The 60-year restriction has limited the practicality for the ENTOMB alternative at commercial reactors that generate significant amounts of long-lived radioactive material. In 1997, the Commission directed its staff to re-evaluate this alternative and identify the technical requirements and regulatory actions that would be necessary for entombment to become a viable option. The resulting evaluation provided several recommendations; however, rulemaking has been deferred pending the completion of additional research studies, for example, on engineered barriers.

⁴ Ibid. Page FR24022, Column 3

⁵ Ibid.

⁶ Ibid. Page FR24023, Column 2

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In 1996, the NRC published revisions to its general requirements for decommissioning nuclear power plants to clarify ambiguities and codify procedures and terminology as a means of enhancing efficiency and uniformity in the decommissioning process.^[7] The amendments allow for greater public participation and better define the transition process from operations to decommissioning. Regulatory Guide 1.184, issued in July 2000, further described the methods and procedures that are acceptable to the NRC staff for implementing the requirements of the 1996 revised rule that relate to the initial activities and the major phases of the decommissioning process. The costs and schedules presented in this analysis follow the general guidance and sequence described in the amended regulations. The format and content of the estimates is also consistent with the recommendations of Regulatory Guide 1.202, issued in February 2005.^[8]

In 2011, the NRC published amended regulations to improve decommissioning planning and thereby reduce the likelihood that any current operating facility will become a legacy site.^[9] The amended regulations require licensees to conduct their operations to minimize the introduction of residual radioactivity into the site, which includes the site's subsurface soil and groundwater. Licensees also may be required to perform site surveys to determine whether residual radioactivity is present in subsurface areas and to keep records of these surveys with records important for decommissioning. The amended regulations require licensees to report additional details in their decommissioning cost estimate as well as requiring additional financial reporting and assurances. These additional details, including the ISFSI decommissioning estimate, are included in this analysis.

Decommissioning Scenarios

The following scenarios were evaluated and are intended to bound the liability associated with the removal of spent fuel from the site. The current operating licenses expire in 2033 and 2034 for Units 1 and 2, respectively. In all four scenarios, decommissioning activities commence shortly after the cessation of plant operations. The spent fuel in the plant's spent fuel storage pool is transferred to the ISFSI within the first fifteen years. The equipment, structures, and portions of the plant containing radioactive contaminants are removed or decontaminated to a level that permits the

⁷ U.S. Code of Federal Regulations, Title 10, Parts 2, 50, and 51, "Decommissioning of Nuclear Power Reactors," Nuclear Regulatory Commission, Federal Register Volume 61, (p 39278 et seq.), July 29, 1996

⁸ "Standard Format and Content of Decommissioning Cost Estimates for Nuclear Power Reactors," Regulatory Guide 1.202, U.S. Nuclear Regulatory Commission, February 2005

⁹ U.S. Code of Federal Regulations, Title 10, Parts 20, 30, 40, 50, 70, and 72, "Decommissioning Planning," Nuclear Regulatory Commission, Federal Register Volume 76, (p 35512 et seq.), June 17, 2011

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facility to be released for unrestricted use. Non-essential structures are then demolished. Spent fuel storage operations continue at the ISFSI until the transfer of the fuel to the DOE is completed (2065 in Scenario 1, 2077 in Scenario 2, 2117 in Scenario 3, and 2217 in Scenario 4).

Scenario	1 st Spent Fuel Canister Replacement	1 st Spent Fuel Assembly Removed from Prairie Island	Last Spent Fuel Assembly Removed from Prairie Island
1	n/a	2027	2065
2	n/a	2051	2077
3	2052	2091	2117
4	2052	2191	2217

For Scenario 2, although it provides a total fuel storage period of 60 years following plant shutdown, Xcel Energy directed TLG Services to not include the cost of transferring the spent fuel in dry storage to new casks at 50 years after plant shutdown. The assumption to not transfer spent fuel at 50 years following plant shutdown in Scenario 2 was premised on the likelihood that the life of the casks could be successfully managed for an additional 10 years.

In Scenarios 3 and 4, the spent fuel casks are assumed to be replaced after fifty years of use. Since the reactor building spent fuel storage pool and fuel handling facilities are removed by the year 2050, a dry fuel transfer facility is assumed to be constructed on site to perform the transfers from the old to the new casks. For Scenario 3, only one such transfer is needed over the time frame assumed. For Scenario 4, the spent fuel will be transferred three times following initial placement in the ISFSI.

Methodology

The methodology used to develop the estimates described within this document follows the basic approach originally presented in the cost estimating guidelines^[10] developed by the Atomic Industrial Forum (now Nuclear Energy Institute). This reference describes a unit cost factor method for estimating decommissioning activity costs. The unit cost factors used in this analysis incorporate site-specific costs and the latest available information about worker productivity in decommissioning.

An activity duration critical path is used to determine the total decommissioning program schedule. This schedule is required upon in calculating the carrying costs,

¹⁰ T.S. LaGuardia et al., "Guidelines for Producing Commercial Nuclear Power Plant Decommissioning Cost Estimates," AIF/NESP-036, May 1986

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which include program management, administration, field engineering, equipment rental, and support services such as quality assurance and security. This systematic approach for assembling decommissioning estimates ensures a high degree of confidence in the reliability of the resulting cost estimate.

Contingency

Consistent with cost estimating practice, contingencies are applied to the decontamination and dismantling costs developed as "specific provision for unforeseeable elements of cost within the defined project scope, particularly important where previous experience relating estimates and actual costs has shown that unforeseeable events which will increase costs are likely to occur."^[11] The cost elements in the estimates are based on ideal conditions; therefore, the types of unforeseeable events that are almost certain to occur in decommissioning, based on industry experience, are addressed through a percentage contingency applied on a line-item basis. This contingency factor is a nearly universal element in all large-scale construction and demolition projects. It should be noted that contingency, as used in this analysis, does not account for price escalation and inflation in the cost of decommissioning over the remaining operating life of the station or duration of the decommissioning program and dry fuel storage period.

Contingency funds are expected to be fully expended throughout the program. As such, inclusion of contingency is necessary to provide assurance that sufficient funding will be available to accomplish the intended tasks.

Low-Level Radioactive Waste Disposal

The contaminated and neutron-activated material generated in the decontamination and dismantling of a commercial nuclear reactor is classified as low-level (radioactive) waste, although not all of the material is suitable for "shallow-land" disposal. With the passage of the "Low-Level Radioactive Waste Policy Act" in 1980,^[12] and its Amendments of 1985,^[13] the states became ultimately responsible for the disposition of low-level radioactive waste generated within their own borders. It was expected that groups of states would combine together to jointly deal with their radioactive wastes; these organizations are referred to as waste disposal compacts.

¹¹ Project and Cost Engineers' Handbook, Second Edition, American Association of Cost Engineers, Marcel Dekker, Inc., New York, New York, p. 239

¹² "Low-Level Radioactive Waste Policy Act of 1980," Public Law 96-573, 1980

¹³ "Low-Level Radioactive Waste Policy Amendments Act of 1985," Public Law 99-240, 1986

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Few approved facilities for the disposal of LLW are currently available. Construction of the newest facility, in Texas, is now complete and the facility was declared operational by the operator, Waste Control Specialists (WCS), in November 2011. The facility will be able to accept limited quantities of non-Compact waste; however, at this time the cost for non-Compact generators is being negotiated on an individual basis.

All options and services currently available to Xcel Energy for disposition of the various waste streams produced by the decommissioning process were considered. The majority of the low-level radioactive waste designated for direct disposal (Class A ^[14]) can be sent to EnergySolutions' facility in Clive, Utah. For the purpose of this analysis, Xcel Energy's "Utilities Service Alliance" agreement with EnergySolutions for offsite processing and disposal is used as the basis for estimating the cost for disposition of the majority of the radioactive waste (Class A). EnergySolutions does not have a license to dispose of the more highly radioactive waste (Classes B and C), for example, generated in the dismantling of the reactor vessel.

The Texas facility is licensed to receive the higher activity waste forms (Classes B and C). As such, for this analysis, disposal costs for the Class B and C waste were based upon the preliminary and indicative information on the cost for such from WCS.

The dismantling of the components residing closest to the reactor core generates radioactive waste that may be considered unsuitable for shallow-land disposal (i.e., low-level radioactive waste with concentrations of radionuclides that exceed the limits established by the NRC for Class C radioactive waste, or greater than Class C (GTCC)). The Low-Level Radioactive Waste Policy Amendments Act of 1985 assigned the federal government the responsibility for the disposal of this material. The Act also stated that the beneficiaries of the activities resulting in the generation of such radioactive waste bear all reasonable costs of disposing of such waste. However, to date, the federal government has not identified a cost for disposing of GTCC or a schedule for acceptance.

For purposes of this analysis, the GTCC radioactive waste is assumed to be packaged and disposed of in a similar manner as high-level waste and at a cost equivalent to that envisioned for the spent fuel. The GTCC is packaged in the same canisters used for spent fuel and either stored on site or shipped directly to a disposal facility as it is generated (depending upon the timing of the

¹⁴ U.S. Code of Federal Regulations, Title 10, Part 61, "Licensing Requirements for Land Disposal of Radioactive Waste"

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decommissioning and whether the spent fuel has been removed from the site prior to the start of decommissioning).

A significant portion of the waste material generated during decommissioning may only be potentially contaminated by radioactive materials. This waste can be analyzed on site or shipped off site to licensed facilities for further analysis, processing and/or conditioning/recovery. Reduction in the volume of low-level radioactive waste requiring disposal in a licensed low-level radioactive waste disposal facility can be accomplished through a variety of methods, including analyses and surveys or decontamination to eliminate the portion of waste that does not require disposal as radioactive waste, compaction, incineration or metal melt. The estimates for Prairie Island reflect the savings from radioactive waste recovery/volume reduction. Material removed during decommissioning that is less than the site release criteria will be designated for conventional disposal or reuse / recovery.

High-Level Radioactive Waste Management

Congress passed the “Nuclear Waste Policy Act”^[15] (NWPA) in 1982, assigning the federal government’s long-standing responsibility for disposal of the spent nuclear fuel created by the commercial nuclear generating plants to the DOE. The NWPA provided that DOE would enter into contracts with utilities in which DOE would promise to take the utilities’ spent fuel and high-level radioactive waste and utilities would pay the cost of the disposition services for that material. NWPA, along with the individual contracts with the utilities, specified that the DOE was to begin accepting spent fuel by January 31, 1998.

Since the original legislation, the DOE has announced several delays in the program schedule. By January 1998, the DOE had failed to accept any spent fuel or high level waste, as required by the NWPA and utility contracts. Delays continue and, as a result, generators have initiated legal action against the DOE in an attempt to obtain compensation for DOE’s partial breach of contract. To date no spent fuel has been accepted from commercial generating sites for disposal.

Completion of the decommissioning process is dependent upon the DOE’s ability to remove spent fuel from the site in a timely manner. DOE’s repository program assumes that spent fuel allocations will be accepted for disposal from the nation’s commercial nuclear plants, with limited exceptions, in the order (the “queue”) in

¹⁵ “Nuclear Waste Policy Act of 1982 and Amendments,” DOE’s Office of Civilian Radioactive Management, 1982

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which it was discharged from the reactor.^[16] Xcel Energy's current spent fuel management plan for the Prairie Island spent fuel assumed in this estimate is based in general upon: 1) a 2025 start date for DOE initiating transfer of commercial spent fuel to a federal facility (not necessarily a final repository), and 2) expectations for spent fuel receipt by the DOE for the Prairie Island fuel. The DOE's generator allocation/receipt schedules are based upon the oldest fuel receiving the highest priority. Assuming a maximum rate of transfer of 3,000 metric tons of uranium (MTU)/year,^[17] the removal of spent fuel from the site is completed in 2065 under Scenario 1. Different DOE acceptance schedules result in different completion dates.

Today, the country is at an impasse on high-level waste disposal. The administration appointed a Blue Ribbon Commission on America's Nuclear Future (Blue Ribbon Commission) to make recommendations for a new plan for nuclear waste disposal. The Blue Ribbon Commission's charter includes a requirement that it consider "[o]ptions for safe storage of used nuclear fuel while final disposition pathways are selected and deployed."^[18]

On January 26, 2012, the Blue Ribbon Commission issued its "Report to the Secretary of Energy" containing a number of recommendations on nuclear waste disposal. Two of the recommendations that may impact decommissioning planning are:

- "[T]he United States [should] establish a program that leads to the timely development of one or more consolidated storage facilities"^[19]
- "[T]he United States should undertake an integrated nuclear waste management program that leads to the timely development of one or more

¹⁶ In 2008, the DOE issued a report to Congress in which it concluded that it did not have authority, under present law, to accept spent nuclear fuel for interim storage from decommissioned commercial nuclear power reactor sites. However, the Blue Ribbon Commission, in its final report, noted that: "[A]ccepting spent fuel according to the OFF [Oldest Fuel First] priority ranking instead of giving priority to shutdown reactor sites could greatly reduce the cost savings that could be achieved through consolidated storage if priority could be given to accepting spent fuel from shutdown reactor sites before accepting fuel from still-operating plants. The magnitude of the cost savings that could be achieved by giving priority to shutdown sites appears to be large enough (i.e., in the billions of dollars) to warrant DOE exercising its right under the Standard Contract to move this fuel first."

¹⁷ "Acceptance Priority Ranking & Annual Capacity Report," DOE/RW-0567, July 2004

¹⁸ Ibid.

¹⁹ "Blue Ribbon Commission on America's Nuclear Future, Report to the Secretary of Energy," <http://www.brc.gov/>, p. 32, January 2012

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permanent deep geological facilities for the safe disposal of spent fuel and high-level nuclear waste.”^[20]

In January 2013, the DOE issued the “Strategy for the Management and Disposal of Used Nuclear Fuel and High-Level Radioactive Waste,” in response to the recommendations made by the Blue Ribbon Commission and as “a framework for moving toward a sustainable program to deploy an integrated system capable of transporting, storing, and disposing of used nuclear fuel...”^[21] This document states:

“With the appropriate authorizations from Congress, the Administration currently plans to implement a program over the next 10 years that:

- Sites, designs and licenses, constructs and begins operations of a pilot interim storage facility by 2021 with an initial focus on accepting used nuclear fuel from shut-down reactor sites;
- Advances toward the siting and licensing of a larger interim storage facility to be available by 2025 that will have sufficient capacity to provide flexibility in the waste management system and allows for acceptance of enough used nuclear fuel to reduce expected government liabilities; and
- Makes demonstrable progress on the siting and characterization of repository sites to facilitate the availability of a geologic repository by 2048.”^[22]

The NRC’s review of DOE’s license application to construct a geologic repository at Yucca Mountain was suspended in 2011 when the Administration slashed the budget for completing that work. However, the US Court of Appeals for the District of Columbia Circuit recently issued a writ of mandamus (in August 2013) ^[23] ordering NRC to comply with federal law and restart its review of DOE’s Yucca Mountain repository license application to the extent of previously appropriated funding for the review. That review is now underway. The current schedule calls for completion and publication of the safety evaluation report by January 2015. The

²⁰ *Ibid.*, p.27

²¹ “Strategy for the Management and Disposal of Used Nuclear Fuel and High-Level Radioactive Waste,” U.S. DOE, January 11, 2013

²² *Ibid.*, p.2

²³ United States Court of Appeals for the District Of Columbia Circuit, In Re: Aiken County, et al, August 2013
[http://www.cadc.uscourts.gov/internet/opinions.nsf/BAE0CF34F762EBD985257BC6004DEB18/\\$file/11-1271-1451347.pdf](http://www.cadc.uscourts.gov/internet/opinions.nsf/BAE0CF34F762EBD985257BC6004DEB18/$file/11-1271-1451347.pdf)

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adjudicatory hearing, which must be completed before a licensing decision can be made, remains suspended

In addition, the state of Minnesota directed the Public Utilities Commission, “when considering approval of a plan for the accrual of funds for the decommissioning of nuclear facilities” ...to “include an evaluation of the costs, if any, arising from storage of used nuclear fuel that may be incurred by the state of Minnesota, and any tribal community, county, city, or township where used nuclear fuel is located following the cessation of operations at a nuclear plant.”^[24]

The state of Minnesota statute also prescribed the parameters to be used in evaluating spent fuel management costs. “To assist the commission in making the determination ... the filing shall provide cost estimates, including ratepayer impacts, assuming used nuclear fuel will be stored in the state for 60 years, 100 years, and 200 years following the cessation of operation of the nuclear plant.”^[25]

Xcel Energy’s current spent fuel management plan for the Prairie Island spent fuel is based in general upon:

- 1) Fuel transferred from the pool to the ISFSI within 15 years of Unit 2 shutdown;
- 2) Exchange of Prairie Island and Monticello spent fuel acceptance rights to best manage the overall cost of spent fuel storage for both plants;
- 3) Fuel will be shipped in the existing Transnuclear casks (Scenarios 1 and 2); casks that are unloaded in the spent fuel transfer operation (Scenarios 3 and 4) are assumed to be mildly neutron activated and therefore must be disposed of as radioactive waste, and
- 4) Availability of a DOE interim or permanent storage repository by 2025 (Scenario 1), 2049 (Scenario 2), 2089 (Scenario 3), or 2189 (Scenario 4). First shipment of fuel from the Prairie Island site occurs two years after DOE initial availability.

The NRC requires that licensees establish a program to manage and provide funding for the caretaking of all irradiated fuel at the reactor site until title of the fuel is transferred to the Secretary of Energy, pursuant to 10 CFR Part 50.54(bb).^[26] This

²⁴ Minnesota Statute 216B.1614, “Nuclear Power Plant Decommissioning and Storage of Used Nuclear Fuel”

²⁵ *Ibid.*

²⁶ U.S. Code of Federal Regulations, Title 10, Part 50, “Domestic Licensing of Production and Utilization Facilities,” Subpart 54 (bb), “Conditions of Licenses”

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requirement is prepared for through inclusion of certain cost elements in the decommissioning estimates, for example, associated with the isolation and continued operation of the spent fuel pool and the ISFSI.

The spent fuel pool is expected to contain freshly discharged assemblies (from the most recent refueling cycles) as well as the final reactor core at shutdown. Over the following fifteen years, the assemblies are packaged into multipurpose canisters for transfer to the ISFSI for interim storage. It is assumed that this period provides the necessary cooling for the final core to meet the storage requirements for decay heat.

An ISFSI, operated under a Part 72 Site Specific License (in accordance with 10 CFR 72^[27]), has been constructed to support continued plant operations. The facility is assumed to be expanded to support decommissioning. This will allow decommissioning activities to proceed within the auxiliary building.

Xcel Energy's position is that the DOE has a contractual obligation to accept Prairie Island' fuel earlier than the projections set out above consistent with its contract commitments. No assumption made in this study should be interpreted to be inconsistent with this claim. However, including the cost of storing spent fuel in this study is appropriate to ensure the availability of sufficient decommissioning funds at the end of the station's life if the DOE has not met its obligation.

Site Restoration

The efficient removal of the contaminated materials at the site may result in damage to many of the site structures. Blasting, coring, drilling, and the other decontamination activities can substantially damage power block structures, potentially weakening the footings and structural supports. Immediate dismantling of site structures (once the facilities are decontaminated) is clearly the most appropriate and cost-effective option. It is unreasonable to anticipate that these structures would be repaired and preserved after the radiological contamination is removed. The cost to dismantle site structures with a work force already mobilized on site is more efficient and less costly than if the process is deferred. Site facilities quickly degrade without maintenance, adding additional expense and creating potential hazards to the public and the demolition work force. Consequently, this study assumes that site structures are removed to a nominal depth of three feet below the local grade level wherever possible. The site is then to be graded and stabilized.

²⁷ U.S. Code of Federal Regulations, Title 10, Part 72.40

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This estimate assumes that some site features will remain following the decommissioning project. These include the existing electrical switchyard, which is assumed to remain functional in support of the regional electrical distribution system; the existing shoreline, canals, and ponds will be left intact.

Summary

The cost to promptly decommission the Prairie Island units assumes the removal of all contaminated and activated plant components and structural materials such that Xcel Energy may then have unrestricted use of the site (exclusive of the ISFSI) with no further requirements for an operating license. Low-level radioactive waste, other than GTCC waste, is sent to a commercial processor for treatment/conditioning or a controlled disposal facility.

The decommissioning scenarios are described in Section 2. The assumptions are presented in Section 3, along with schedules of annual expenditures. The major cost contributors are identified in Section 6, with detailed activity costs, waste volumes, and associated manpower requirements delineated in Appendices C through F. The major cost components are also identified in the cost summary provided at the end of this section.

The cost elements in the estimates are assigned to one of three subcategories: NRC License Termination, Spent Fuel Management, and Site Restoration. The subcategory “NRC License Termination” is used to accumulate costs that are consistent with “decommissioning” as defined by the NRC in its financial assurance regulations (i.e., 10 CFR Part 50.75). The cost reported for this subcategory is generally sufficient to terminate the units’ operating licenses, recognizing that there may be some additional cost impact from spent fuel management.

The “Spent Fuel Management” subcategory contains costs associated with the containerization and transfer of spent fuel to the ISFSI, and the management of the ISFSI until such time that the transfer of all fuel from this facility to an off-site location (e.g., geologic repository) is complete.

“Site Restoration” is used to capture costs associated with the dismantling and demolition of buildings and facilities demonstrated to be free from contamination. This includes structures never exposed to radioactive materials, as well as those facilities that have been decontaminated to appropriate levels. Structures are removed to a depth of three feet and backfilled to conform to local grade.

It should be noted that the costs assigned to these subcategories are allocations. Delegation of cost elements is for the purposes of comparison (e.g., with NRC financial

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guidelines) or to permit specific financial treatment (e.g., ARO determinations). In reality, there can be considerable interaction between the activities in the three subcategories. For example, an owner may decide to remove non-contaminated structures early in the project to improve access to highly contaminated facilities or plant components. In these instances, the non-contaminated removal costs could be reassigned from Site Restoration to an NRC License Termination support activity. However, in general, the allocations represent a reasonable accounting of those costs that can be expected to be incurred for the specific subcomponents of the total estimated program cost, if executed as described.

The estimates presented in this document reflects the total cost to decontaminate the nuclear units, manage the spent fuel until the DOE is able to complete the transfer to a federal facility, dismantle the plant and restore the site for alternative use.

As noted within this document, the estimates were developed and costs are presented in 2014 dollars. As such, the estimates do not reflect the escalation of costs (due to inflationary and market forces) over the remaining operating life of the reactors or during the decommissioning period.

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**SCENARIO 1
COST SUMMARY
PRAIRIE ISLAND NUCLEAR GENERATING PLANT
DECOMMISSIONING COST ELEMENTS
(thousands of 2014 dollars)**

Cost Element	Unit 1	Unit 2	Total
Decontamination	10,139	15,991	26,131
Removal	87,812	111,782	199,595
Packaging	40,002	32,457	72,459
Transportation	8,054	8,470	16,523
Waste Disposal	60,145	61,216	121,361
Off-site Waste Processing	13,095	15,482	28,577
Program Management ^[1]	214,518	256,773	471,291
Railroad Track Maintenance	2,477	2,402	4,880
Spent Fuel Management (direct costs) ^[2]	162,534	160,315	322,849
Insurance and Regulatory Fees	22,791	20,148	42,938
Energy	25,868	25,377	51,245
Characterization and Licensing Surveys	13,004	15,336	28,340
Property Taxes	32,499	30,375	62,874
Miscellaneous Equipment	7,019	7,052	14,071
Spent Fuel Pool Isolation	12,434	8,290	20,724
Security	22,755	92,865	115,620
Total ^[3]	735,147	864,331	1,599,478

Cost Element	Unit 1	Unit 2	Total
License Termination	476,522	552,040	1,028,562
Spent Fuel Management	212,421	255,739	468,160
Site Restoration	46,204	56,552	102,756
Total ^[3]	735,147	864,331	1,599,478

^[1] Includes engineering and security costs

^[2] Excludes program management costs (staffing) but includes capital expenditures for ISFSI construction, costs for spent fuel loading/packaging/spent fuel pool O&M and EP fees

^[3] Columns may not add due to rounding

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**SCENARIO 2
COST SUMMARY
PRAIRIE ISLAND NUCLEAR GENERATING PLANT
DECOMMISSIONING COST ELEMENTS
(thousands of 2014 dollars)**

Cost Element	Unit 1	Unit 2	Total
Decontamination	10,139	15,991	26,131
Removal	87,812	111,782	199,595
Packaging	40,002	32,457	72,459
Transportation	8,054	8,470	16,523
Waste Disposal	60,145	61,216	121,361
Off-site Waste Processing	13,095	15,482	28,577
Program Management ^[1]	227,082	269,337	496,418
Railroad Track Maintenance	3,214	3,139	6,353
Spent Fuel Management (direct costs) ^[2]	176,583	174,364	350,947
Insurance and Regulatory Fees	25,831	23,189	49,020
Energy	25,868	25,377	51,245
Characterization and Licensing Surveys	13,004	15,336	28,340
Property Taxes	39,882	37,758	77,640
Miscellaneous Equipment	7,019	7,052	14,071
Spent Fuel Pool Isolation	12,434	8,290	20,724
Security	37,457	107,566	145,023
Total ^[3]	787,621	916,805	1,704,427

Cost Element	Unit 1	Unit 2	Total
License Termination	476,522	552,040	1,028,562
Spent Fuel Management	264,896	308,213	573,109
Site Restoration	46,204	56,552	102,756
Total ^[3]	787,621	916,805	1,704,427

^[1] Includes engineering and security costs

^[2] Excludes program management costs (staffing) but includes capital expenditures for ISFSI construction, costs for spent fuel loading/packaging/spent fuel pool O&M and EP fees

^[3] Columns may not add due to rounding

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**SCENARIO 3
COST SUMMARY
PRAIRIE ISLAND NUCLEAR GENERATING PLANT
DECOMMISSIONING COST ELEMENTS
(thousands of 2014 dollars)**

Cost Element	Unit 1	Unit 2	Total
Decontamination	10,139	15,991	26,131
Removal	87,812	111,782	199,595
Packaging	40,002	32,457	72,459
Transportation	10,510	10,926	21,435
Waste Disposal	82,405	83,476	165,881
Off-site Waste Processing	13,095	15,482	28,577
Program Management ^[1]	287,677	329,932	617,608
Railroad Track Maintenance	5,669	5,594	11,262
Spent Fuel Management (direct costs) ^[2]	539,948	537,730	1,077,678
Insurance and Regulatory Fees	35,967	33,324	69,291
Energy	25,868	25,377	51,245
Characterization and Licensing Surveys	13,004	15,336	28,340
Property Taxes	64,492	62,368	126,860
Miscellaneous Equipment	7,019	7,052	14,071
Spent Fuel Pool Isolation	12,434	8,290	20,724
Security	86,459	156,568	243,027
Total ^[3]	1,322,501	1,451,684	2,774,184

Cost Element	Unit 1	Unit 2	Total
License Termination	476,522	552,040	1,028,561
Spent Fuel Management	799,880	843,197	1,643,077
Site Restoration	46,099	56,447	102,546
Total ^[3]	1,322,501	1,451,684	2,774,184

^[1] Includes engineering and security costs

^[2] Excludes program management costs (staffing) but includes capital expenditures for ISFSI construction, costs for spent fuel loading/packaging/spent fuel pool O&M and EP fees

^[3] Columns may not add due to rounding

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**SCENARIO 4
COST SUMMARY
PRAIRIE ISLAND NUCLEAR GENERATING PLANT
DECOMMISSIONING COST ELEMENTS
(thousands of 2014 dollars)**

Cost Element	Unit 1	Unit 2	Total
Decontamination	10,157	16,009	26,166
Removal	88,003	111,973	199,976
Packaging	40,005	32,459	72,464
Transportation	15,424	15,840	31,263
Waste Disposal	126,946	128,017	254,962
Off-site Waste Processing	13,095	15,482	28,577
Program Management ^[1]	441,849	484,104	925,954
Railroad Track Maintenance	11,806	11,731	23,537
Spent Fuel Management (direct costs) ^[2]	1,259,858	1,257,639	2,517,497
Insurance and Regulatory Fees	61,306	58,664	119,970
Energy	25,868	25,377	51,245
Characterization and Licensing Surveys	13,004	15,337	28,341
Property Taxes	126,017	123,894	249,911
Miscellaneous Equipment	7,019	7,052	14,071
Spent Fuel Pool Isolation	12,434	8,290	20,724
Security	208,968	279,078	488,045
Total ^[3]	2,461,760	2,590,944	5,052,704

Cost Element	Unit 1	Unit 2	Total
License Termination	476,653	552,172	1,028,826
Spent Fuel Management	1,938,818	1,982,135	3,920,953
Site Restoration	46,288	56,636	102,925
Total ^[3]	2,461,760	2,590,944	5,052,704

^[1] Includes engineering and security costs

^[2] Excludes program management costs (staffing) but includes capital expenditures for ISFSI construction, costs for spent fuel loading/packaging/spent fuel pool O&M and EP fees

^[3] Columns may not add due to rounding

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1. INTRODUCTION

This report presents estimates of the cost to promptly decommission the Prairie Island Nuclear Generating Plant (Prairie Island) following cessation of plant operations and the operation and eventual decommissioning of the on-site Independent Spent Fuel Storage Installation (ISFSI). The analysis relies upon site-specific, technical information from an earlier evaluation prepared in 2011,^{[1]*} updated to reflect current assumptions pertaining to the disposition of the nuclear units and relevant industry experience in undertaking such projects. The current estimates are designed to provide Xcel Energy with sufficient information to assess its financial obligations, as they pertain to the eventual decommissioning of the nuclear units. It is not a detailed engineering document, but a financial analysis prepared in advance of the detailed engineering that will be required to carry out the decommissioning. It also may not reflect the actual plan to decommission Prairie Island; the plan may differ from the assumptions made in this analysis based on facts that exist at the time of decommissioning.

1.1 OBJECTIVES OF STUDY

The objectives of this study are to prepare comprehensive estimates of the costs to decommission the Prairie Island nuclear units, to provide a sequence or schedule for the associated activities, and to develop waste stream projections from the decontamination and dismantling activities.

The operating licenses were originally issued for the plant in August 1973 and October 1974 for Units 1 and 2, respectively, and were valid for a period of 40 years. In April 2008, Nuclear Management Company (as agent for Xcel Energy), submitted an application for renewed licenses (i.e., 20 year extensions). The application was approved by the NRC in June 2011. Therefore, for the purposes of this study, final shutdown dates (license expiration) for Unit 1 and Unit 2 are August 9, 2033 and October 29, 2034, respectively, assuming a 60-year operating life (the current operating licenses' expiration dates).

1.2 SITE DESCRIPTION

Prairie Island is located on the west bank of the Mississippi River, approximately 26 miles southeast of the Twin City Metropolitan Area and within the city limits of Red Wing. The site is in Goodhue County, Minnesota.

* References provided in Section 7 of the document

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The Nuclear Steam Supply System (NSSS) consists of a pressurized water reactor and a two-loop reactor coolant system. The system is comprised of the reactor vessel and two closed reactor coolant loops connected in parallel to the reactor vessel, each containing a reactor coolant pump and a steam generator. An electrically heated pressurizer is connected to one of the loops.

The system is housed within the reactor containment vessel, a free-standing cylindrical steel shell with a hemispherical dome and ellipsoidal bottom designed to withstand the internal pressure accompanying a loss-of-coolant accident. The reactor containment vessel is surrounded by a cylindrical shield building constructed of reinforced concrete, which serves as a radiation shielding for normal operations and for the loss-of-coolant condition.

Heat produced in the reactor is converted to electrical energy by the plant's power conversion system. A turbine-generator converts the thermal energy of steam produced in the steam generators into mechanical shaft power and then into electrical energy. The turbine-generator consists of one high-pressure, double-flow and two low-pressure, double-flow elements driving a direct-coupled generator at 1800 rpm. The turbines are operated in a closed feedwater cycle in which the steam is condensed and returned to the steam generators by the feedwater system.

Heat rejected in the main condensers is removed by the circulating water system, which provides the heat sink for the removal of the waste heat in the power plant's thermal cycle. The majority of the heat is removed through dilution with river water in the discharge canal. Forced draft cooling towers provided supplemental heat removal.

1.3 REGULATORY GUIDANCE

The Nuclear Regulatory Commission (NRC or Commission) provided initial decommissioning requirements in its rule "General Requirements for Decommissioning Nuclear Facilities," issued in June 1988.^[2] This rule set forth financial criteria for decommissioning licensed nuclear power facilities. The regulation addressed decommissioning planning needs, timing, funding methods, and environmental review requirements. The intent of the rule was to ensure that decommissioning would be accomplished in a safe and timely manner and that adequate funds would be available for this purpose. Subsequent to the rule, the NRC issued Regulatory Guide 1.159, "Assuring the Availability of Funds for Decommissioning Nuclear Reactors,"^[3] which provided additional guidance to the licensees of nuclear facilities on the

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financial methods acceptable to the NRC staff for complying with the requirements of the rule. The regulatory guide addressed the funding requirements and provided guidance on the content and form of the financial assurance mechanisms indicated in the rule.

The rule defined three decommissioning alternatives as being acceptable to the NRC: DECON, SAFSTOR, and ENTOMB. The DECON alternative assumes that any contaminated or activated portion of the plant's systems, structures and facilities are removed or decontaminated to levels that permit the site to be released for unrestricted use shortly after the cessation of plant operations; while the SAFSTOR and ENTOMB alternatives defer the process.

The rule also placed limits on the time allowed to complete the decommissioning process. For SAFSTOR, the process is restricted in overall duration to 60 years, unless it can be shown that a longer duration is necessary to protect public health and safety. The guidelines for ENTOMB are similar, providing the NRC with both sufficient leverage and flexibility to ensure that this deferred option is only used in situations where it is reasonable and consistent with the definition of decommissioning. At the conclusion of a 60-year dormancy period (or longer for ENTOMB if the NRC approves such a case), the site would still require significant remediation to meet the unrestricted release limits for license termination.

The ENTOMB alternative has not been viewed as a viable option for power reactors due to the significant time required to isolate the long-lived radionuclides for decay to permissible levels. However, with rulemaking permitting the controlled release of a site,^[4] the NRC did evaluate this alternative. The resulting feasibility study, based upon an assessment by Pacific Northwest National Laboratory, concluded that the method did have conditional merit for some, if not most reactors. However, the staff also found that additional rulemaking would be needed before this option could be treated as a generic alternative. The NRC had considered rulemaking to alter the 60-year time for completing decommissioning and to clarify the use of engineered barriers for reactor entombments.^[5] At this time, however, the NRC's staff has recommended that rulemaking be deferred, based upon several factors including that no licensee has committed to pursuing the entombment option, the unresolved issues associated with the disposition of greater-than-Class C material (GTCC), and the NRC's current priorities, at least until after the additional research studies are complete. The Commission concurred with the staff's recommendation.

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In 1996, the NRC published revisions to the general requirements for decommissioning nuclear power plants.^[6] When the decommissioning regulations were adopted in 1988, it was assumed that the majority of licensees would decommission at the end of the facility's operating licensed life. Since that time, several licensees permanently and prematurely ceased operations. Exemptions from certain operating requirements were required once the reactor was defueled to facilitate the decommissioning. Each case was handled individually, without clearly defined generic requirements. The NRC amended the decommissioning regulations in 1996 to clarify ambiguities and codify procedures and terminology as a means of enhancing efficiency and uniformity in the decommissioning process. The amendments allow for greater public participation and better define the transition process from operations to decommissioning.

Under the revised regulations, licensees will submit written certification to the NRC within 30 days after the decision to cease operations. Certification will also be required once the fuel is permanently removed from the reactor vessel. Submittal of these notices will entitle the licensee to a fee reduction and eliminate the obligation to follow certain requirements needed only during operation of the reactor. Within two years of submitting notice of permanent cessation of operations, the licensee is required to submit a Post-Shutdown Decommissioning Activities Report (PSDAR) to the NRC. The PSDAR describes the planned decommissioning activities, the associated sequence and schedule, and an estimate of expected costs. Prior to completing decommissioning, the licensee is required to submit an application to the NRC to terminate the license, which will include a license termination plan (LTP).

In 2011, the NRC published amended regulations to improve decommissioning planning and thereby reduce the likelihood that any current operating facility will become a legacy site.^[7] The amended regulations require licensees to conduct their operations to minimize the introduction of residual radioactivity into the site, which includes the site's subsurface soil and groundwater. Licensees also may be required to perform site surveys to determine whether residual radioactivity is present in subsurface areas and to keep records of these surveys with records important for decommissioning. The amended regulations require licensees to report additional details in their decommissioning cost estimate as well as requiring additional financial reporting and assurances. These additional details, including the ISFSI decommissioning estimate, are included in this analysis.

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1.3.1 High Level Waste

Congress passed the “Nuclear Waste Policy Act”^[8] (NWPA) in 1982, assigning the federal government’s long-standing responsibility for disposal of the spent nuclear fuel created by the commercial nuclear generating plants to the DOE. The NWPA provided that DOE would enter into contracts with utilities in which DOE would promise to take the utilities’ spent fuel and high level waste, and utilities would pay the cost of the disposition services for that material. NWPA, along with the individual disposal contracts with the utilities, specified that the DOE was to begin accepting spent fuel by January 31, 1998.

Since the original legislation, the DOE has announced several delays in the program schedule. By January 1998, the DOE had failed to accept spent nuclear fuel or high level waste, as required by the NWPA and utility contracts. Delays continue and, as a result, generators have initiated legal action against the DOE in an attempt to obtain compensation for DOE’s partial breach of contract. To date no spent fuel has been accepted from commercial generating sites for disposal.

Completion of the decommissioning process is dependent upon the DOE’s ability to remove spent fuel from the site in a timely manner. DOE’s repository program assumes that spent fuel allocations will be accepted for disposal from the nation’s commercial nuclear plants, with limited exceptions, in the order (the “queue”) in which it was discharged from the reactor. Xcel Energy’s current spent fuel management plan for the Prairie Island spent fuel assumed in this estimate is based in general upon: 1) a 2025 start date for DOE initiating transfer of commercial spent fuel to a federal facility (not necessarily a final repository), and 2) expectations for spent fuel receipt by the DOE for the Prairie Island fuel. The DOE’s generator allocation/receipt schedules are based upon the oldest fuel receiving the highest priority. Assuming a maximum rate of transfer of 3,000 metric tons of uranium (MTU)/year,^[9] the removal of spent fuel from the site is completed in 2065 (Scenario 1). Different DOE acceptance schedules result in different completion dates.

Today, the country is at an impasse on high-level waste disposal. The administration appointed a Blue Ribbon Commission on America’s Nuclear Future (Blue Ribbon Commission) to make recommendations for a new plan for nuclear waste disposal. The Blue Ribbon Commission’s charter includes a requirement that it consider “[o]ptions for safe storage of used nuclear fuel while final disposition pathways are selected and deployed.”^[10]

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On January 26, 2012, the Blue Ribbon Commission issued its “Report to the Secretary of Energy” containing a number of recommendations on nuclear waste disposal. Two of the recommendations that may impact decommissioning planning are:

- “[T]he United States [should] establish a program that leads to the timely development of one or more consolidated storage facilities”
- “[T]he United States should undertake an integrated nuclear waste management program that leads to the timely development of one or more permanent deep geological facilities for the safe disposal of spent fuel and high-level nuclear waste.”^[11]

In January 2013, the DOE issued the “Strategy for the Management and Disposal of Used Nuclear Fuel and High-Level Radioactive Waste,” in response to the recommendations made by the Blue Ribbon Commission and as “a framework for moving toward a sustainable program to deploy an integrated system capable of transporting, storing, and disposing of used nuclear fuel...”^[12] This document states:

“With the appropriate authorizations from Congress, the Administration currently plans to implement a program over the next 10 years that:

- Sites, designs and licenses, constructs and begins operations of a pilot interim storage facility by 2021 with an initial focus on accepting used nuclear fuel from shut-down reactor sites;
- Advances toward the siting and licensing of a larger interim storage facility to be available by 2025 that will have sufficient capacity to provide flexibility in the waste management system and allows for acceptance of enough used nuclear fuel to reduce expected government liabilities; and
- Makes demonstrable progress on the siting and characterization of repository sites to facilitate the availability of a geologic repository by 2048.”

The NRC’s review of DOE’s license application to construct a geologic repository at Yucca Mountain was suspended in 2011 when the Administration slashed the budget for completing that work. However, the US Court of Appeals for the District of Columbia Circuit in August 2013 issued a writ of mandamus^[13] ordering NRC to comply with federal law and restart its review of DOE’s Yucca Mountain repository license application to the extent of previously appropriated funding for the review. That review is now underway. The current schedule calls for completion

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and publication of the safety evaluation report by January 2015. The adjudicatory hearing, which must be completed before a licensing decision can be made, remains suspended.

In addition, the state of Minnesota directed the Public Utilities Commission, “when considering approval of a plan for the accrual of funds for the decommissioning of nuclear facilities” ...to “include an evaluation of the costs, if any, arising from storage of used nuclear fuel that may be incurred by the state of Minnesota, and any tribal community, county, city, or township where used nuclear fuel is located following the cessation of operations at a nuclear plant.”^[14]

The state of Minnesota statute also prescribed the parameters to be used in evaluating spent fuel management costs. “To assist the commission in making the determination ... the filing shall provide cost estimates, including ratepayer impacts, assuming used nuclear fuel will be stored in the state for 60 years, 100 years, and 200 years following the cessation of operation of the nuclear plant.”

Xcel Energy’s current spent fuel management plan for the Prairie Island spent fuel is based in general upon:

- 1) Fuel transferred from the pool to the ISFSI within 15 years of Unit 2 shutdown;
- 2) Exchange of Prairie Island and Monticello spent fuel acceptance rights to best manage the overall cost of spent fuel storage for both plants;
- 3) Fuel will be shipped in the existing Transnuclear casks (Scenarios 1 and 2); casks that are unloaded in the spent fuel transfer operation (Scenarios 3 and 4) are assumed to be mildly neutron activated and therefore must be disposed of as radioactive waste, and
- 4) Availability of a DOE interim or permanent storage repository by 2025 (Scenario 1), 2049 (Scenario 2), 2089 (Scenario 3), or 2189 (Scenario 4). First shipment of fuel from the Prairie Island site occurs two years after DOE initial availability.

The NRC requires that licensees establish a program to manage and provide funding for the management of all irradiated fuel at the reactor site until title of the fuel is transferred to the Secretary of Energy, pursuant to 10 CFR Part 50.54(bb).^[15] This requirement is prepared for

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through inclusion of certain cost elements in the decommissioning estimates, for example, associated with the isolation and continued operation of the spent fuel pool and the ISFSI.

The spent fuel pool is expected to contain freshly discharged assemblies (from the most recent refueling cycles) as well as the final reactor cores at shutdown. Over the following fifteen years, the assemblies are packaged into Transnuclear casks for transfer to the ISFSI for interim storage. It is assumed that this period provides the necessary cooling for the final core to meet the storage requirements for decay heat.

An ISFSI, operated under a Part 72 Site Specific License (in accordance with 10 CFR 72^[16]), has been constructed to support continued plant operations. The facility is assumed to be expanded to support decommissioning. This will allow decommissioning activities to proceed within the auxiliary building.

The DOE has a contractual obligation to accept Prairie Island's fuel earlier than the projections set out above consistent with its contract commitments. No assumption made in this study should be interpreted to be inconsistent with this claim. However, at this time, including the cost of storing spent fuel in this study is appropriate, and ensures the availability of sufficient decommissioning funds if the DOE has not met its obligation.

1.3.2 Low-Level Radioactive Waste

The contaminated and neutron-activated material generated in the decontamination and dismantling of a commercial nuclear reactor is classified as low-level (radioactive) waste, although not all of the material is suitable for "shallow-land" disposal. With the passage of the "Low-Level Radioactive Waste Policy Act" in 1980,^[17] and its Amendments of 1985,^[18] the states became ultimately responsible for the disposition of low-level radioactive waste generated within their own borders. It was expected that groups of states would combine together to jointly deal with their radioactive wastes; these organizations are referred to as waste disposal compacts.

Few approved facilities for the disposal of LLW are currently available. Construction of the newest facility, in Texas, is now complete and the facility was declared operational by the operator, Waste Control Specialists (WCS), in November 2011. The facility will be able to accept limited

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quantities of non-Compact waste; however, at this time the cost for non-Compact generators is being negotiated on an individual basis.

All options and services currently available to Xcel Energy for disposition of the various waste streams produced by the decommissioning process were considered. The majority of the low-level radioactive waste designated for direct disposal (Class A^[19]) can be sent to EnergySolutions' facility in Clive, Utah. For the purpose of this analysis, Xcel Energy's "Utilities Service Alliance" agreement with EnergySolutions for offsite processing and disposal is used as the basis for estimating the disposal cost for the majority of the radioactive waste (i.e., Class A). EnergySolutions does not have a license to dispose of the more highly radioactive waste (Classes B and C), for example, generated in the dismantling of the reactor vessel.

The Texas facility is licensed to receive the higher activity waste forms (Classes B and C). As such, for this analysis, disposal costs for the Class B and C waste were based upon the preliminary and indicative information on the cost for such from WCS.

The dismantling of the components residing closest to the reactor core generates radioactive waste that may be considered unsuitable for shallow-land disposal (i.e., low-level radioactive waste with concentrations of radionuclides that exceed the limits established by the NRC for Class C radioactive waste (GTCC)). The Low-Level Radioactive Waste Policy Amendments Act of 1985 assigned the federal government the responsibility for the disposal of this material. The Act also stated that the beneficiaries of the activities resulting in the generation of such radioactive waste bear all reasonable costs of disposing of such waste. However, to date, the federal government has not identified a cost for disposing of GTCC or a schedule for acceptance.

For purposes of this analysis, the GTCC radioactive waste is assumed to be packaged and disposed of in a similar manner as the spent fuel and at a cost equivalent to that envisioned for the spent fuel. The GTCC is packaged in the same canisters used for spent fuel and either stored on site or shipped directly to a disposal facility as it is generated (depending upon the timing of the decommissioning and whether the spent fuel has been removed from the site prior to the start of decommissioning).

A significant portion of the waste material generated during decommissioning may only be potentially contaminated by radioactive

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materials. This waste can be analyzed on site or shipped off site to licensed facilities for further analysis, for processing and/or for conditioning/recovery. Reduction in the volume of low-level radioactive waste requiring disposal in a licensed low-level radioactive waste disposal facility can be accomplished through a variety of methods, including analyses and surveys or decontamination to eliminate the portion of waste that does not require disposal as radioactive waste, compaction, incineration or metal melt. The estimates for the Prairie Island units reflect the savings from waste recovery/volume reduction.

Material removed during decommissioning that is less than the site release criteria will be designated for conventional disposal or reuse / recovery.

1.3.3 Radiological Criteria for License Termination

In 1997, the NRC published Subpart E, “Radiological Criteria for License Termination,”^[20] amending 10 CFR Part 20. This subpart provides radiological criteria for releasing a facility for unrestricted use. The regulation states that the site can be released for unrestricted use if radioactivity levels are such that the average member of a critical group would not receive a Total Effective Dose Equivalent (TEDE) in excess of 25 millirem per year, and provided that residual radioactivity has been reduced to levels that are As Low As Reasonably Achievable (ALARA). The decommissioning estimates for the Prairie Island site assumed that it will be remediated to a residual level consistent with the NRC-prescribed level.

It should be noted that the NRC and the Environmental Protection Agency (EPA) differ on the amount of residual radioactivity considered acceptable in site remediation. The EPA has two limits that apply to radioactive materials. An EPA limit of 15 millirem per year is derived from criteria established by the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA or Superfund).^[21] An additional and separate limit of 4 millirem per year, as defined in 40 CFR §141.16, is applied to drinking water.^[22]

On October 9, 2002, the NRC signed an agreement with the EPA on the radiological decommissioning and decontamination of NRC-licensed sites. The Memorandum of Understanding (MOU)^[23] provides that EPA will defer exercise of authority under CERCLA for the majority of facilities decommissioned under NRC authority. The MOU also includes

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provisions for NRC and EPA consultation for certain sites when, at the time of license termination, (1) groundwater contamination exceeds EPA-permitted levels; (2) NRC contemplates restricted release of the site; and/or (3) residual radioactive soil concentrations exceed levels defined in the MOU.

The MOU does not impose any new requirements on NRC licensees and should reduce the involvement of the EPA with NRC licensees who are decommissioning. Most sites are expected to meet the NRC criteria for unrestricted use, and the NRC believes that only a few sites will have groundwater or soil contamination in excess of the levels specified in the MOU that trigger consultation with the EPA. However, if there are other hazardous materials on the site, the EPA may be involved in the cleanup. As such, the possibility of dual regulation remains for certain licensees. The present study does not include any costs for this occurrence.

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See Notes & Reference drawings

New Admin Building

Chlorine House

Screenhouse

Light Pole

Overhead Power Lines

Approx. 100 Ft.

Overhead Power Lines

Approx. 20 Ft.

Fuel Oil & Transfer House

Old Administration Building

Oil Storage

Xfmr (GT)

Xfmr (M)

Xfmr (R)

Xfmr (GT)

Sw. Stand

Hydrogen Stg. Area

Trans. Oil Sump

Security Guardhouse

594.350N 2,356,675E

594.350N 2,356,115E

Turbine Building

Security Diesel Bldg.

Security Cable Trench Covers:

Boric Acid Storage Tank Room Below

Unit 2 Auxiliary Building

Unit 1 Auxiliary Building

Unit 2 Reactor Building

Unit 1 Reactor Building

Service Building

Water Treat. Area

Sulfuric Acid Tank Encl.

Waste Heat Tank House

Emerg. Gen. Building

Cond. Stg. Tank

Gas House

Unit 1 / D6 Building

Unit 2 / D6 Building

Unit 1 / D6 Fuel Oil Revng Tank

Unit 2 / D6 Fuel Oil Revng Tank

Cond Stg Tanks

Fire Protection Hydrant houses:

Spent Fuel Storage Enclosure below

LLRW Drum Storage

Drum Transfer & Truck Loading

Red Waste Building

Resin Disp. Bldg

No. 2 Warehouse

594.000N 2,356,500E

Construction Fab Shop

End of Paved Road

No. 1 Warehouse

SECURITY ACCESS FACILITY

Security Fence restrictions:
• No vehicles or materials stored within 10 feet of fence.

Reference Drawings
Security Fence Details - NF-85538-1 Thru 10.
Notes
1) - Denotes PA Fence
2) See Dwg. NF-85538-2 Detail 'E' For Post Installation.
3) See Dwg. NF-85538-1 Thru 5 For Notes & Tolerances.
4) Non - Security Related.

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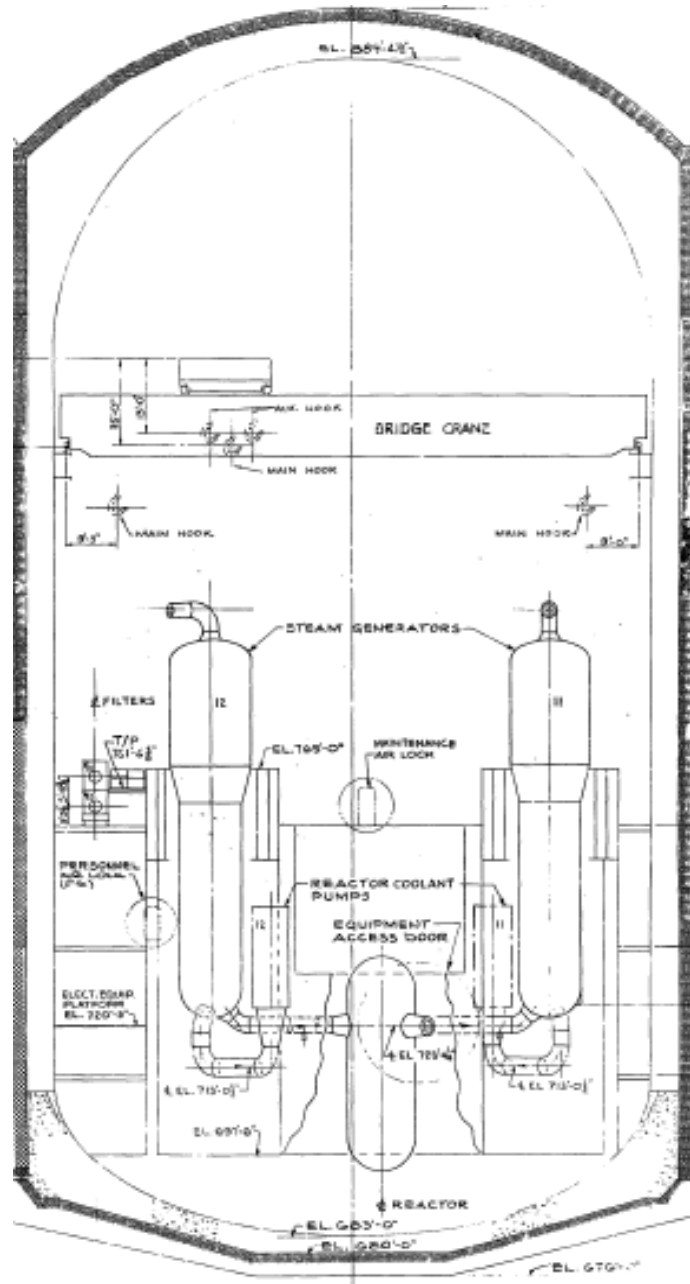
**FIGURE 1.2
PRAIRIE ISLAND NUCLEAR GENERATING PLANT
AERIAL VIEW**



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**FIGURE 1.3
PRAIRIE ISLAND NUCLEAR GENERATING PLANT
REACTOR BUILDING SECTION**



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2. DECOMMISSIONING ALTERNATIVE DESCRIPTION

Detailed cost estimates were developed to promptly decommission the Prairie Island nuclear units, (i.e., the DECON decommissioning alternative). The DECON alternative, as defined by the NRC, is "the alternative in which the equipment, structures, and portions of a facility and site containing radioactive contaminants are removed or decontaminated to a level that permits the property to be released for unrestricted use shortly after cessation of operations."

The following scenarios were evaluated and are intended to bound the liability associated with the removal of spent fuel from the site. The current operating licenses expire in 2033 and 2034 for Units 1 and 2, respectively. In all four scenarios, decommissioning activities commence shortly after the cessation of plant operations. The spent fuel in the plant's spent fuel storage pool is transferred to the ISFSI within the first fifteen years. The equipment, structures, and portions of the plant containing radioactive contaminants are removed or decontaminated to a level that permits the facility to be released for unrestricted use. Non-essential structures are then demolished. Spent fuel storage operations continue at the site (at the ISFSI) until the transfer of the fuel to the DOE is completed (2065 in Scenario 1, 2077 in Scenario 2, 2117 in Scenario 3, and 2217 in Scenario 4).

Scenario	1 st Spent Fuel Canister Replacement	1 st Spent Fuel Assembly Removed from Prairie Island	Last Spent Fuel Assembly Removed from Prairie Island
1	n/a	2027	2065
2	n/a	2051	2077
3	2052	2091	2117
4	2052	2191	2217

The following sections describe the basic activities associated with the DECON alternative. Although detailed procedures for each activity identified are not provided, and the actual sequence of work may vary, the activity descriptions provide a basis not only for estimating but also for the expected scope of work (i.e., engineering and planning at the time of decommissioning).

The conceptual approach that the NRC has described in its regulations divides decommissioning into three phases. The initial phase commences with the effective date of permanent cessation of operations and involves the transition of both plant and licensee from reactor operations (i.e., power production) to facility de-activation and closure. During the first phase, notification is provided to the NRC certifying

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the permanent cessation of operations and the removal of fuel from the reactor vessel. The licensee is then prohibited from reactor operation.

The second phase encompasses activities during the storage period or during major decommissioning activities, or a combination of the two. The third phase pertains to the activities involved in license termination. The decommissioning estimates developed for Prairie Island are also divided into phases or periods; however, demarcation of the phases is based upon major milestones within the project or significant changes in the projected rate of expenditure.

2.1 PERIOD 1 - PREPARATIONS

In anticipation of the cessation of plant operations, detailed preparations are undertaken to provide a smooth transition from plant operations to site decommissioning. Through implementation of a staffing transition plan, the organization required to manage the intended decommissioning activities is assembled from available plant staff and outside resources. Preparations include the planning for permanent defueling of the reactor, revision of technical specifications applicable to the operating conditions and requirements, a characterization of the facility and major components, and the development of the PSDAR.

2.1.1 Engineering and Planning

The PSDAR, required within two years of the notice to cease operations, provides a description of the licensee's planned decommissioning activities, a timetable, and the associated financial requirements of the intended decommissioning program. Upon receipt of the PSDAR, the NRC will make the document available to the public for comment in a local hearing to be held in the vicinity of the reactor site. Ninety days following submittal and NRC receipt of the PSDAR, the licensee may begin to perform major decommissioning activities under a modified 10 CFR § Part 50.59 procedure (10 CFR §50.59 establishes the conditions under which licensees may make changes to the facility or procedures and conduct test or experiments, i.e., without prior NRC approval). Major activities are defined as any activity that results in permanent removal of major radioactive components, permanently modifies the structure of the containment, or results in dismantling components (for shipment) containing GTCC, as defined by 10 CFR §61. Major components are further defined as comprising the reactor vessel and internals, steam generators, large bore reactor coolant system piping, and other large components that are radioactive. The NRC includes the

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following additional criteria for use of the §50.59 process in decommissioning. The proposed activity must not:

- foreclose release of the site for possible unrestricted use,
- significantly increase decommissioning costs,
- cause any significant environmental impact, or
- violate the terms of the licensee's existing license.

Existing operational technical specifications are reviewed and modified to reflect plant conditions and the safety concerns associated with permanent cessation of operations. The environmental impact associated with the planned decommissioning activities is also considered. Typically, a licensee is not allowed to proceed if the consequences of a particular decommissioning activity are greater than that bounded by previously evaluated environmental assessments or impact statements. In this instance, the licensee must submit a license amendment for the specific activity and update the environmental report.

The decommissioning program outlined in the PSDAR is designed to accomplish the required tasks within the ALARA guidelines (as defined in 10 CFR Part 20) for protection of personnel from exposure to radiation hazards. It also addresses the continued protection of the health and safety of the public and the environment during the dismantling activity. Consequently, with the development of the PSDAR, activity specifications, cost-benefit and safety analyses, work packages, and procedures are assembled to support the proposed decontamination and dismantling activities.

2.1.2 Site Preparations

Following final plant shutdown, and in preparation for actual decommissioning activities, the following activities are initiated:

- Characterize the site and surrounding environs. This includes radiation surveys and sampling of the work areas, major components (including the reactor vessel and its internals), internal piping, and biological shield.
- Isolate the spent fuel storage pool and fuel handling systems, such that decommissioning operations can commence on the balance of the plant. Decommissioning operations are scheduled around the fuel

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handling area to optimize the overall project schedule. The fuel is transferred from the pool once it decays to the point that it meets the heat load criteria of the storage/transport containers. Consequently, it is assumed that the fuel pool will remain operational for approximately fifteen years following the cessation of plant operations while the residual inventory is transferred to the ISFSI.

- Specify the transport and disposal requirements for activated materials and/or hazardous materials, including shielding and waste stabilization.
- Develop procedures for occupational exposure control, control and release of liquid and gaseous effluent, processing of radwaste (including dry-active waste, resins, filter media, metallic and non-metallic components generated in decommissioning), site security and emergency programs, and industrial safety.
- Perform chemical decontamination of the NSSS to reduce radiation levels in support of removal operations.

2.2 PERIOD 2 - DECOMMISSIONING OPERATIONS

This period includes the physical decommissioning activities associated with the removal and disposal of contaminated and activated components and structures, including the successful release of the site from the 10 CFR §50 operating license, exclusive of the ISFSI. Significant decommissioning activities in this phase include:

- Construction of temporary facilities and/or modification of existing facilities to support dismantling activities. For example, this will include a centralized processing area to facilitate equipment removal and component preparations for off-site disposal.
- Reconfiguration and modification of site structures and facilities as needed to support decommissioning operations. This may include the upgrading of roads (on- and off-site) to facilitate hauling and transport. Modifications may be required to the containment structure to facilitate access of large/heavy equipment. Modifications may also be required to the refueling area of the building to support the segmentation of the reactor vessel internals and component extraction.
- Transfer of the spent fuel from the storage pool to the ISFSI pad for interim storage.

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- Design and fabrication of temporary and permanent shielding to support removal and transportation activities, construction of contamination control envelopes, and the procurement of specialty tooling.
- Procurement (lease or purchase) of shipping canisters, cask liners, and industrial packages.
- Decontamination of components and piping systems as required to control (minimize) worker exposure.
- Remove piping and components no longer essential to support decommissioning operations.
- Removal of control rod drive housings and the head service structure from reactor vessel head. Segment the vessel closure head.
- Removal and segmentation of the upper internals assemblies. Segmentation will maximize the loading of the shielded transport casks, (i.e., by weight and activity). The operations are conducted under water using remotely operated tooling and contamination controls.
- Disassembly and segmentation of the remaining reactor internals, including the core former and lower core support assembly. Some material is expected to exceed Class C disposal requirements. As such, the segments will be packaged in modified spent fuel storage canisters for geologic disposal.
- Segmentation of the reactor vessel. A shielded platform is installed for segmentation as cutting operations are performed in air using remotely operated equipment within a contamination control envelope. The water level is maintained just below the cut to minimize the working area dose rates. Segments are transferred in-air to containers that are stored under water, for example, in an isolated area of the refueling canal.
- Removal of the activated portions of the concrete biological shield and accessible contaminated concrete surfaces. If dictated by the steam generator and pressurizer removal scenarios, those portions of the associated cubicles necessary for access and component extraction are removed.
- Removal of the steam generators and pressurizer for material recovery and controlled disposal. The generators will be moved to an on-site processing center, the steam domes are removed and the internal components segregated for off-site processing. The lower shell and tube bundle will be packaged for direct disposal. These components can serve as their own burial containers provided that all penetrations are properly sealed and the internal contaminants are stabilized. Steel shielding is added, as necessary,

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to those external areas of the steam generators to meet transportation limits and regulations.

- Expansion of the ISFSI and transfer of the spent fuel from the storage pool to the ISFSI pad for interim storage. Spent fuel storage operations continue throughout the active decommissioning period. Fuel transfer to DOE is expected to be completed by the end of the year 2065 (Scenario 1).

At least two years prior to the anticipated date of license termination, a LTP is required. Submitted as a supplement to the Final Safety Analysis Report (FSAR), or its equivalent, the plan must include: a site characterization, description of the remaining dismantling activities, plans for site remediation, procedures for the final radiation survey, designation of the end use of the site, an updated cost estimate to complete the decommissioning, and any associated environmental concerns. The NRC will notice the receipt of the plan, make the plan available for public comment, and schedule a local hearing. LTP approval will be subject to any conditions and limitations as deemed appropriate by the Commission. The licensee may then commence with the final remediation of site facilities and services, including:

- Removal of remaining plant systems and associated components as they become nonessential to the decommissioning program or worker health and safety (e.g., waste collection and treatment systems, electrical power and ventilation systems).
- Removal of the steel liners from refueling canal, disposing of the activated and contaminated sections as radioactive waste. Removal of any remaining activated/ contaminated concrete.
- Surveys of the decontaminated areas of the containment structure.
- Remediation and removal of the contaminated equipment and material from the auxiliary building and any other contaminated facility. Radiation and contamination controls are utilized until residual levels indicate that the structures and equipment can be released for unrestricted access and conventional demolition. This activity may necessitate the dismantling and disposition of most of the systems and components (both clean and contaminated) located within these buildings. This activity facilitates surface decontamination and subsequent verification surveys required prior to obtaining release for demolition.
- Remove the remaining components, equipment, and plant services in support of the area release survey(s).

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- Route material removed during the decontamination and dismantling to a central processing area. Material certified to be free of contamination is released for unrestricted disposition (e.g., as scrap, recycle, or for general disposal). Contaminated material is characterized and segregated for additional off-site processing (disassembly, chemical cleaning, volume reduction, and waste treatment), and/or packaged for controlled disposal at a low-level radioactive waste disposal facility.

Incorporated into the LTP is the Final Survey Plan. This plan identifies the radiological surveys to be performed once the decontamination activities are completed and is developed using the guidance provided in the “Multi-Agency Radiation Survey and Site Investigation Manual (MARSSIM).”^[24] This document incorporates the statistical approaches to survey design and data interpretation used by the EPA. It also identifies commercially available instrumentation and procedures for conducting radiological surveys. Use of this guidance ensures that the surveys are conducted in a manner that provides a high degree of confidence that applicable NRC criteria are satisfied. Once the survey is complete, the results are provided to the NRC in a format that can be verified. The NRC then reviews and evaluates the information, performs an independent confirmation of radiological site conditions, and makes a determination on the requested change to the operating licenses (that would release the property, exclusive of the ISFSI, for unrestricted use).

The NRC will amend the operating licenses if it determines that site remediation has been performed in accordance with the LTP, and that the terminal radiation survey and associated documentation demonstrate that the property (exclusive of the ISFSI) is suitable for release.

2.3 PERIOD 3 - SITE RESTORATION

Following completion of decommissioning operations, site restoration activities will begin. Efficient removal of the contaminated materials and verification that residual radionuclide concentrations are below the NRC limits may result in substantial damage to many of the structures. Although performed in a controlled, safe manner, blasting, coring, drilling, scarification (surface removal), and the other decontamination activities will substantially degrade power block structures including the reactor and auxiliary buildings. Under certain circumstances, verifying that subsurface radionuclide concentrations meet NRC site release requirements will require removal of grade slabs and lower floors, potentially weakening footings and structural supports. This removal activity is necessary for those facilities and plant areas where historical records, when available, indicate the potential for radionuclides

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having been present in the soil, where system failures have been recorded, or where it is required to confirm that subsurface process and drain lines were not breached over the operating life of the station.

It is not currently anticipated that these structures would be repaired and preserved after the radiological contamination is removed. The cost to dismantle site structures with a work force already mobilized on site is more efficient than if the process is deferred. Site facilities quickly degrade without maintenance, adding additional expense and creating potential hazards to the public as well as to future workers. Abandonment creates a breeding ground for vermin infestation as well as other biological hazards.

This cost study presumes that non-essential structures and site facilities are dismantled as a continuation of the decommissioning activity. Foundations and exterior walls are removed to a nominal depth of three feet below grade. The three-foot depth allows for the placement of gravel for drainage, as well as topsoil, so that vegetation can be established for erosion control. Site areas affected by the dismantling activities are restored and the plant area graded as required to prevent ponding and inhibit the refloating of subsurface materials.

Non-contaminated concrete rubble produced by demolition activities is processed to remove reinforcing steel and miscellaneous embedments. The processed material is then used on site to backfill foundation voids. Excess non-contaminated materials are trucked to an off-site area for disposal as construction debris at no cost or credit to the decommissioning program.

2.4 ISFSI OPERATIONS AND DECOMMISSIONING

The ISFSI will continue to operate under a site-specific license as authorized by 10 CFR Part 72. Assuming the DOE begins to remove fuel from the Prairie Island site in 2027, the process is not expected to be completed until 2065 (Scenario 1). Any delay in the transfer process, for example, due to a delay in the scheduled opening of the geologic repository, a slower acceptance rate, or a combination of both, can result in a longer on-site residence time for the fuel discharge from the reactor, as well as additional caretaking expenses. Scenarios 2, 3 and 4 address an extended delay. Scenarios 3 and 4 also reflect an assumption that the spent fuel casks will need to be replaced every fifty years.

The assumed design for the ISFSI is based upon the use of the TN-40 and TN-40HT casks from Transnuclear. The Prairie Island ISFSI already contains twenty-four TN-40 casks, and Xcel Energy has indicated that the remainder of the Prairie Island spent fuel will be loaded into TN-40HT casks. Therefore the

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TN-40 and TN-40HT are used as a basis for this cost analysis. For purposes of this cost analysis, it is assumed that the spent fuel is shipped to DOE within the Transnuclear casks.

In Scenarios 3 and 4, once the spent fuel has been removed from the original casks by Xcel Energy in the cask replacement operation, the now-empty Transnuclear casks will be disposed of as low-level waste.

At the conclusion of the spent fuel transfer process, the ISFSI will be decommissioned. The NRC will terminate the license if it determines that the remediation of the ISFSI has been performed in accordance with an ISFSI license termination plan and that the final radiation survey and associated documentation demonstrate that the facility is suitable for release. Once the requirements are satisfied, the NRC can terminate the license for the ISFSI.

The concrete storage pad will then be removed, and the area graded and landscaped to conform to the surrounding environment.

3. COST ESTIMATE

The cost estimates prepared for decommissioning the Prairie Island units consider the unique features of the plant, including the nuclear steam supply system, electric power generating systems, support services, plant structures, and ancillary facilities. The basis of the estimates, including the sources of information relied upon, the estimating methodology employed, site-specific considerations, and other pertinent assumptions, is described in this section.

3.1 BASIS OF COST ESTIMATE

The analysis relies upon site-specific, technical information from an earlier evaluation prepared in 2011, updated to reflect current assumptions pertaining to the disposition of nuclear power plants and relevant industry experience in undertaking such projects. This information was reviewed for the current analysis and updated as deemed appropriate. The site-specific considerations and assumptions used in the previous evaluations were also revisited. Modifications were incorporated where new information was available or experience from ongoing decommissioning programs provided viable alternatives or improved processes.

3.2 METHODOLOGY

The methodology used to develop the estimates follows the basic approach originally presented in the AIF/NESP-036 study report, "Guidelines for Producing Commercial Nuclear Power Plant Decommissioning Cost Estimates,"^[25] and the DOE "Decommissioning Handbook."^[26] These documents present a unit factor method for estimating decommissioning activity costs, which simplifies the estimating calculations. Unit factors for concrete removal (\$/cubic yard), steel removal (\$/ton), and cutting costs (\$/inch) are developed using local labor rates. The activity-dependent costs are estimated with the item quantities (cubic yards and tons), developed from plant drawings and inventory documents. Removal rates and material costs for the conventional disposition of components and structures rely upon information available in the industry publication, "Building Construction Cost Data," published by R.S. Means.^[27]

The unit factor method provides a demonstrable basis for establishing a reliable cost estimate. The detail provided in the unit factors, including activity duration, labor costs (by craft), and equipment and consumable costs, ensures that essential elements have not been omitted. Appendix A presents the

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detailed development of a typical unit factor. Appendix B provides the values contained within one set of factors developed for this analysis.

This analysis reflects lessons learned from TLG's involvement in the Shippingport Station Decommissioning Project, completed in 1989, as well as the decommissioning of the Cintichem reactor, hot cells, and associated facilities, completed in 1997. In addition, the planning and engineering for the Pathfinder, Shoreham, Rancho Seco, Trojan, Yankee Rowe, Big Rock Point, Maine Yankee, Humboldt Bay-3, Oyster Creek, Connecticut Yankee, and San Onofre-1 nuclear units have provided additional insight into the process, the regulatory aspects, and the technical challenges of decommissioning commercial nuclear units.

Work Difficulty Factors

The estimates follow the principles of ALARA through the use of work duration adjustment factors. These factors address the impact of activities such as radiological protection instruction, mock-up training, and the use of respiratory protection and protective clothing. The factors lengthen a task's duration, increasing costs and lengthening the overall schedule. ALARA planning is considered in the costs for engineering and planning, and in the development of activity specifications and detailed procedures. Changes to worker exposure limits may impact the decommissioning cost and project schedule.

Work difficulty adjustment factors (WDFs) account for the inefficiencies in working in a power plant environment. The factors are assigned to each unique set of unit cost factors, commensurate with the inefficiencies associated with working in confined, hazardous environments. The ranges used for the WDFs are as follows:

• Access Factor	10% to 20%
• Respiratory Protection Factor	10% to 50%
• Radiation/ALARA Factor	10% to 37%
• Protective Clothing Factor	0% to 30%
• Work Break Factor	8.33%

The factors and their associated range of values were developed in conjunction with the AIF/NESP-036 study. The application of the factors is discussed in more detail in that publication.

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Scheduling Program Durations

The unit factors, adjusted by the WDFs as described above, are applied against the inventory of materials to be removed in the radiological controlled areas. The resulting labor-hours, or crew-hours, are used in the development of the decommissioning program schedule, using resource loading and event sequencing considerations. The scheduling of conventional removal and dismantling activities is based upon productivity information available from the "Building Construction Cost Data" publication. Dismantling of the fuel handling systems and decontamination of the spent fuel pool is also dependent upon the timetable for the transfer of the spent fuel assemblies from the pool to the ISFSI.

An activity duration critical path is used to determine the total decommissioning program schedule. The schedule is relied upon in calculating the carrying costs, which include program management, administration, field engineering, equipment rental, and support services such as quality control and security. This systematic approach for assembling decommissioning estimates ensures a high degree of confidence in the reliability of the resulting costs.

3.3 IMPACT OF DECOMMISSIONING MULTIPLE REACTOR UNITS

In estimating the near simultaneous decommissioning of two co-located reactor units there can be opportunities to achieve economies of scale, by sharing costs between units, and coordinating the sequence of work activities. There will also be schedule constraints, particularly where there are requirements for specialty equipment and staff, or practical limitations on when final status surveys can take place. For purposes of the estimates, Units 1 and 2 are assumed to be essentially identical. Common facilities have been assigned to Unit 2. A summary of the principal impacts are listed below.

- The sequence of work generally follows the principal that the work is done at Unit 1 first, followed by similar work at Unit 2. This permits the experience gained at Unit 1 to be applied by the workforce at the second unit. It should be noted however, that the estimates do not consider productivity improvements at the second unit, since there is little documented experience with decommissioning two units simultaneously. The work associated with developing activity specifications and procedures can be considered essentially identical between the two units, therefore the second unit costs are assumed to be a fraction of the first unit (~ 43%).

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- Segmenting the reactor vessel and internals will require the use of special equipment. The cost of procuring that equipment is assumed to be shared on an equal basis between the two units. In addition, the decommissioning project will be scheduled such that Unit 2's reactor internals and vessel are segmented immediately after the activities at Unit 1 have been completed.
- Duplication of some program management and support costs, particularly costs associated with the more senior positions, can be avoided with two reactors undergoing decommissioning simultaneously. As a result, the estimates are based on a "lead" unit that includes these senior positions, and a "second" unit that excludes these positions. The designation as lead is based on the unit undertaking the most complex tasks (for instance vessel segmentation) or performing tasks for the first time.
- The final radiological survey schedule is also affected by a two-unit decommissioning schedule. Trying to complete the final status survey of Unit 1, while Unit 2 still has ongoing radiological remediation work and waste handling in process is considered impractical. As a result, Unit 1 and Unit 2 delay durations awaiting spent fuel pool availability for decommissioning are synchronized, such that the spent fuel pool area decommissioning and subsequent final status survey can be completed for the station. During the spent fuel storage period, program management costs are reduced accordingly.
- The final demolition of buildings at Units 1 and 2 are considered to take place concurrently.
- Unit 1, as the first unit to enter decommissioning, incurs the majority of site characterization costs.
- Shared systems and structures are generally assigned to Unit 2.
- Station costs such as ISFSI operations, emergency response fees, regulatory agency fees, and insurance are generally allocated on an equal basis between the two units.

3.4 FINANCIAL COMPONENTS OF THE COST MODEL

TLG's proprietary decommissioning cost model, DECCER, produces a number of distinct cost elements. These direct expenditures, however, do not comprise the total cost to accomplish the project goal, i.e., license termination, spent fuel management and site restoration.

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3.4.1 Contingency

Inherent in any cost estimate that does not rely on historical data is the inability to specify the precise source of costs imposed by factors such as tool breakage, accidents, illnesses, weather delays, and labor stoppages. In the DECCER cost model, contingency fulfills this role. Contingency is added to each line item to account for costs that are difficult or impossible to develop analytically. Such costs are historically inevitable over the duration of a job of this magnitude; therefore, this cost analysis includes funds to cover these types of expenses.

The activity- and period-dependent costs are combined to develop the total decommissioning cost. A contingency is then applied on a line-item basis, using one or more of the contingency types listed in the AIF/NESP-036 study. "Contingencies" are defined in the American Association of Cost Engineers "Project and Cost Engineers' Handbook"^[28] as "specific provision for unforeseeable elements of cost within the defined project scope; particularly important where previous experience relating estimates and actual costs has shown that unforeseeable events which will increase costs are likely to occur." The cost elements in this analysis are based upon ideal conditions and maximum efficiency; therefore, consistent with industry practice, contingency is included. In the AIF/NESP-036 study, the types of unforeseeable events that are likely to occur in decommissioning are discussed and guidelines are provided for a contingency percentage in each category. It should be noted that contingency, as used in this analysis, does not account for price escalation and inflation in the cost of decommissioning over the remaining operating life of the station.

Contingency funds are an integral part of the total cost to complete the decommissioning process. Exclusion of this component puts at risk a successful completion of the intended tasks and, potentially, subsequent related activities. For this study, TLG examined the major activity-related problems (decontamination, segmentation, equipment handling, packaging, transport, and waste disposal) that necessitate a contingency. Individual activity contingencies ranged from 0% to 75%, depending on the degree of difficulty judged to be appropriate from TLG's actual decommissioning experience. The contingency values used in this study are consistent with those developed in the AIF/NESP-036 study and are as follows:

- Decontamination 50%
- Contaminated Component Removal 25%

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• Contaminated Component Packaging	10%
• Contaminated Component Transport	15%
• Low-Level Radioactive Waste Disposal	25%
• Low-Level Radioactive Waste Processing	15%
• Reactor Segmentation	75%
• Nuclear Steam Supply System Component Removal	25%
• Reactor Waste Packaging	25%
• Reactor Waste Transport	25%
• Reactor Vessel Component Disposal	50%
• Greater Than Class C Disposal	15%
• Non-Radioactive Component Removal	15%
• Heavy Equipment and Tooling	15%
• Supplies	25%
• Engineering	15%
• Energy	15%
• Insurance, Property Taxes and Fees	10%
• Staffing	15%
• Characterization and Termination Surveys	30%
• Construction	15%
• Spent Fuel Capital Costs (Canisters and Overpacks)	15%
• Spent Fuel Transfer Costs	15%
• Operations and Maintenance Expenses	15%
• ISFSI Decommissioning	25%

The contingency values are applied to the appropriate components of the estimate on a line item basis. The composite contingency values for the four scenarios are reported at the end of each detailed estimate as provided in Appendices C through F.

3.4.2 Financial Risk

In addition to the routine uncertainties addressed by contingency, another cost element that is sometimes necessary to consider when bounding decommissioning costs relates to uncertainty, or risk. Examples can include changes in work scope, pricing, job performance, and other variations that could conceivably, but not necessarily, occur. Consideration is sometimes necessary to generate a level of confidence in the estimates, within a range of probabilities. TLG considers these

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types of costs under the broad term “financial risk.” Included within the category of financial risk are:

- Transition activities and costs: ancillary expenses associated with eliminating 50% to 80% of the site labor force shortly after the cessation of plant operations, added cost for worker separation packages throughout the decommissioning program, national or company-mandated retraining, and retention incentives for key personnel.
- Delays in approval of the decommissioning plan due to intervention, public participation in local community meetings, legal challenges, and national and local hearings.
- Changes in the project work scope from the baseline estimate, involving the discovery of unexpected levels of contaminants, contamination in places not previously expected, contaminated soil previously undiscovered (either radioactive or hazardous material contamination), variations in plant inventory or configuration not indicated by the as built drawings.
- Regulatory changes, for example, affecting worker health and safety, site release criteria, waste transportation, and disposal.
- Policy decisions altering national commitments (e.g., in the ability to accommodate certain waste forms for disposition), or in the timetable for such, for example, the start and rate of acceptance of spent fuel by the DOE.
- Pricing changes for basic inputs such as labor, energy, materials, and disposal. Items subject to widespread price competition (such as materials) may not show significant variation; however, others such as waste disposal could exhibit large pricing uncertainties, particularly in markets where limited access to services is available.

It has been TLG’s experience that the results of a risk analysis, when compared with the base case estimate for decommissioning, indicate that the chances of the base decommissioning estimate’s being too high is a low probability, and the chances that the estimate is too low is a higher probability. This is mostly due to the pricing uncertainty for low-level radioactive waste disposal, and to a lesser extent due to schedule increases from changes in plant conditions and to pricing variations in the cost of labor (both craft and staff). This cost study, however, does not add any additional costs to the estimates for financial risk, since there is insufficient historical data from which to project future liabilities.

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Consequently, the areas of uncertainty or risk should be revisited periodically and addressed through repeated revisions or updates of the base estimates.

3.5 SITE-SPECIFIC CONSIDERATIONS

There are a number of site-specific considerations that affect the method for dismantling and removal of equipment from the site and the degree of restoration required. The cost impact of the considerations identified below is included in this cost study.

3.5.1 Spent Fuel Management

The cost to dispose the spent fuel generated from plant operations is not reflected within the estimates to decommission the Prairie Island units. Ultimate disposition of the spent fuel is within the province of the DOE's Waste Management System, as defined by the Nuclear Waste Policy Act (the disposal cost is financed by a 1 mill/kWhr surcharge paid into the DOE's waste fund during operations). However, the NRC requires licensees to establish a program to manage and provide funding for the management of all irradiated fuel at the reactor until title of the fuel is transferred to the Secretary of Energy. This funding requirement is fulfilled through inclusion of certain high-level waste cost elements within the estimates, as described below.

Spent Fuel Management Model

Completion of the decommissioning process is dependent upon the DOE's ability to remove spent fuel from the site in a timely manner. DOE's repository program assumes that spent fuel allocations will be accepted for disposal from the nation's commercial nuclear plants, with limited exceptions, in the order (the "queue") in which it was discharged from the reactor. The DOE contracts provide mechanisms for altering the oldest fuel first allocation scheme, including emergency deliveries, exchanges of allocations amongst utilities and the option of providing priority acceptance from permanently shut down nuclear reactors. Because it is unclear how these mechanisms may operate once DOE begins accepting spent fuel from commercial reactors, this study assumes that DOE will accept spent fuel in an oldest fuel first order. The timing for removal of spent fuel from the site is based upon the DOE's most recently published annual acceptance rates of 400 MTU/year for year 1, 3,800 MTU total for years 2 through 4 and 3,000 MTU/year for year 5 and beyond.^[29]

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Xcel Energy's current spent fuel management plan for the Prairie Island spent fuel is based in general upon:

- 1) Fuel transferred from the pool to the ISFSI within 15 years of Unit 2 shutdown;
- 2) Exchange of Prairie Island and Monticello spent fuel acceptance rights to best manage the overall cost of spent fuel storage for both plants;
- 3) Fuel will be shipped in the existing Transnuclear casks (Scenarios 1 and 2); casks that are unloaded in the spent fuel transfer operation (Scenarios 3 and 4) are assumed to be mildly neutron activated and therefore must be disposed of as radioactive waste, and
- 4) Availability of a DOE interim or permanent storage repository by 2025 (Scenario 1), 2049 (Scenario 2), 2089 (Scenario 3), or 2189 (Scenario 4). First shipment of fuel from the Prairie Island site occurs two years after DOE initial availability.

ISFSI

This analysis assumes that the existing ISFSI is modified at the cessation of plant operations to accommodate the fuel present in the storage pool at shutdown.

Operation and maintenance costs for the spent fuel pool and ISFSI are included within the estimates and address the costs for staffing the facility, as well as security, insurance, and licensing fees. The estimates also include the costs to purchase, load, and transfer the Transnuclear TN-40HT metal cask storage system spent fuel storage canisters from the pool to the ISFSI. Costs are also provided for the final disposition of the ISFSI once the transfer of the TN-40HT casks from the ISFSI to the DOE is complete.

Storage Canister Design

The design and capacity of the ISFSI is based upon the TN-40HT dry cask storage system. A capacity of 40 fuel assemblies is used.

Canister Loading and Transfer

The estimates include an average cost of \$427,000 for the labor to load/transport the spent fuel from the pool to the ISFSI pad. For

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estimating purposes an allowance of \$292,000 is used for the cost to transfer each fuel canister from the ISFSI to the DOE.

Operations and Maintenance

An annual cost (excluding labor) of approximately \$792,000 and \$96,000 are used for operation and maintenance of the spent fuel pool and the ISFSI, respectively.

At shutdown, the spent fuel pool is expected to contain freshly discharged assemblies (from the most recent refueling cycles). Over the next fifteen years the assemblies are packaged into TN-40HTs for transfer to the ISFSI for transfer to the DOE. It is assumed that the fifteen years provides the necessary cooling period for the final core to meet the decay heat requirements for dry storage. Once the pool is emptied, the spent fuel storage and handling facilities are available for decommissioning.

ISFSI Design Considerations

The TN-40HT is an ultra-high capacity vertical storage system with self-contained steel and borated resin shielding. Borated aluminum plates and stainless steel tubes form the basket assembly. The Prairie Island ISFSI already contains twenty-four TN-40 casks, and Xcel Energy has indicated that the remainder of the Prairie Island spent fuel will be loaded into TN-40HT casks. Therefore the TN-40 and TN-40HT are used as a basis for this cost analysis. Transnuclear casks are self-contained units and are transferred whole to the DOE; therefore for Scenarios 1 and 2 there is no cask material remaining following spent fuel storage operations that require decommissioning, other than the storage pad. For Scenarios 3 and 4, all of the Transnuclear casks will be replaced during the ISFSI spent fuel storage period. While it is expected that surface contamination within the Transnuclear casks could be removed to levels that meet the site release criteria, it is also expected that the casks will have some level of neutron-induced activation as a result of the long-term storage of the fuel (i.e., to levels exceeding free-release limits). The cost of the disposal of these Transnuclear casks is reflected within the estimates for Scenarios 3 and 4.

Replacement of casks during ISFSI fuel storage period

Scenarios 1 and 2 do not assume any replacement of the spent fuel storage casks (recasking).

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Two of the cost estimates, Scenarios 3 and 4, include costs to recask the spent fuel, based upon an assumption that the TN-40 cask has a limited lifetime of approximately 50 years.

Scenario 3, which is 100 years (nominally) in length, considers a single repackaging effort for each TN-40 canister in the ISFSI.

Scenario 4, which is a (nominal) 200 year scenario, assumes that when any cask in the ISFSI reaches the 50 years of storage milestone, the cask is replaced. In Scenario 4, the fuel will be recasked three times following final shutdown of Prairie Island.

Since the reactor building, spent fuel storage pool, and fuel handling facilities are removed by the year 2050, a dry fuel transfer facility is assumed to be constructed on site to perform the transfers from the old to the new casks. Scenarios 3 and 4 include the cost to construct such a transfer facility, as well as additional staffing positions for support of the dry transfer activities, and additional NRC oversight associated with the transfer operations. The decommissioning of this transfer facility is also included in Scenarios 3 and 4.

ISFSI Decommissioning

In accordance with 10 CFR §72.30, licensees must have a proposed decommissioning plan for the ISFSI site and facilities that includes a cost estimate to implement. The plan should contain sufficient information on the proposed practices and procedures for the decontamination of the ISFSI and for the disposal of residual radioactive materials after all spent fuel, high-level radioactive waste, and reactor-related GTCC waste have been removed.

The ISFSI pad is not expected to be contaminated and will be demolished accordingly after a confirmation survey. For Scenarios 3 and 4, the dry fuel transfer facility constructed to support the spent fuel transfer operation is also not expected to be contaminated, and will be demolished after a confirmation survey.

The cost estimate for decommissioning the ISFSI reflects: 1) the cost of an independent contractor performing the decommissioning activities; 2) an adequate contingency factor; and 3) the cost of meeting the criteria for unrestricted use. The cost summary for decommissioning the ISFSI is presented in Appendix G. The demolition of the ISFSI for all four scenarios is reflected within the estimates.

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GTCC

The dismantling of the reactor internals is expected to generate radioactive waste considered unsuitable for shallow land disposal (i.e., GTCC waste). The Low-Level Radioactive Waste Policy Amendments Act of 1985 assigned the Federal Government the responsibility for the disposal of this material. The Act also stated that the beneficiaries of the activities resulting in the generation of such radioactive waste bear all reasonable costs of disposing of such waste. To date, the Federal Government has not identified a cost for disposal of GTCC or a schedule for acceptance. As such, the estimates to decommission the Prairie Island units include an allowance for the disposition of GTCC material.

For purposes of this study, GTCC is packaged in the same canisters used to store spent fuel. It is not anticipated that the DOE would accept this waste prior to completing the transfer of spent fuel. Therefore, until such time the DOE is ready to accept GTCC waste, it is reasonable to assume that this material remains in storage with the spent fuel at the ISFSI.

3.5.2 Reactor Vessel and Internal Components

The reactor pressure vessel and internal components are segmented for disposal in shielded, reusable transportation casks. Segmentation is performed underwater in the refueling canal, where a turntable and remote cutter are installed. The vessel is segmented in place, using a mast-mounted cutter supported off the lower head and directed from a shielded work platform installed overhead in the reactor cavity. Transportation cask specifications and transportation regulations will dictate segmentation and packaging methodology. The control elements are disposed of along with the spent fuel and, there is no additional cost provided for their disposal.

The dismantling of the reactor internals will generate radioactive waste considered unsuitable for shallow land disposal (i.e., GTCC). Although the material is not classified as high-level waste, federal regulations under the LLRW Policy Amendments Act specifies the GTCC LLWR is designated a federal responsibility under Section 3(b)(1)(D). However, the DOE has not been forthcoming with an acceptance criteria or disposition schedule for this material, and numerous questions remain as to the ultimate disposal cost and waste form requirements. As such, for purposes of this study, the GTCC has been packaged and disposed of in the same manner as high-level waste, at a cost equivalent to that

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envisioned for the spent fuel. This is consistent with the concept that the generator of GTCC waste will bear all reasonable costs of disposing of such wastes. ^[30]

Intact disposal of reactor vessel shells has been successfully demonstrated at several of the sites that have been decommissioned. Access to navigable waterways has allowed these large packages to be transported to the Barnwell disposal site with minimal overland travel. Intact disposal of the reactor vessel and internal components can provide savings in cost and worker exposure by eliminating the complex segmentation requirements, isolation of the GTCC material, and transport/storage of the resulting waste packages. Portland General Electric (PGE) was able to dispose of the Trojan reactor as an intact package (including the internals). However, its location on the Columbia River simplified the transportation analysis since:

- the reactor package could be secured to the transport vehicle for the entire journey, i.e., the package was not lifted during transport,
- there were no man-made or natural terrain features between the plant site and the disposal location that could produce a large drop, and
- transport speeds were very low, limited by the overland transport vehicle and the river barge.

As a member of the Northwest Compact, PGE had a site available for disposal of the package - the US Ecology facility in Washington State. The characteristics of this arid site proved favorable in demonstrating compliance with land disposal regulations.

It is not known whether this option will be available when the Prairie Island units cease operation. Future viability of this option will depend upon the ultimate location of the disposal site, as well as the disposal site licensee's ability to accept highly radioactive packages and effectively isolate them from the environment. As such, the estimates assume segmentation of the reactor vessel, as a bounding condition. With lower levels of activation, the vessel shell can be packaged more efficiently than the curie-limited internal components. This will allow the use of more conventional waste packages rather than shielded casks for transport.

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3.5.3 Primary System Large Components

The reactor coolant system components are assumed to be decontaminated using chemical agents prior to the start of cutting operations. This type of decontamination can be expected to have a significant ALARA impact in the DECON scenario, since in this scenario the removal work is done within the first few years of shutdown. It should be noted that if the decommissioning work is significantly delayed, chemical decontamination might not be necessary. A decontamination factor (average reduction) of 10 is assumed for the process. Disposal of the decontamination solution effluent is included within the estimate as a "process liquid waste" charge.

The following discussion deals with the removal and disposition of the steam generators, but the techniques involved are also applicable to other large radioactively-contaminated components, such as heat exchangers, component coolers, and the pressurizer. The steam generators' size and weight, their location within the reactor building, as well as the disposal facility waste acceptance criteria, and access to transportation will ultimately determine the removal, transportation, and disposal strategy.

A trolley crane is set up for the removal of the generators. It can also be used to move portions of the steam generator cubicle walls and floor slabs from the reactor building to a location where they can be decontaminated and transported to the material handling area. Interferences within the work area, such as grating, piping, and other components are removed to create sufficient lay-down space for processing these large components.

The generators are rigged for removal, disconnected from the surrounding piping and supports, and maneuvered into the open area where they are lowered onto a down-ending cradle. Each generator is rotated into the horizontal position for extraction from the containment and placed onto a multi-wheeled vehicle for transport to an on-site preparation area.

The generators are disassembled on-site with the outer shell and lightly contaminated subassemblies designated for off-site recycling. The more highly contaminated tube sheet and tube bundle are packaged for direct disposal.

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Disposal costs are based upon the displaced volume and weight of the primary side portions of the steam generators. Each component is then loaded onto a rail car for transport to the disposal facility. The secondary side is assumed to be sent to an off-site waste processor.

Reactor coolant piping is cut from the reactor vessel once the water level in the vessel (used for personnel shielding during dismantling and cutting operations in and around the vessel) is dropped below the elevation of associated nozzle(s). The piping is boxed and transported by shielded van. The reactor coolant pumps and motors are lifted out intact, packaged, and transported for processing and/or disposal.

3.5.4 Main Turbine and Condenser

The main turbine and condenser are assumed to have only minor levels of contamination. As such, the components are dismantled using conventional maintenance procedures. The turbine rotors and shafts are removed to a laydown area. The lower turbine casings are removed from their anchors by controlled demolition. The main condensers are also disassembled and moved to a laydown area. Material is then surveyed and designated for either decontamination or volume reduction, conventional disposal, or controlled disposal. Components are packaged and readied for transport in accordance with the intended disposition.

3.5.5 Transportation Methods

Contaminated piping, components, and structural material other than the highly activated reactor vessel and internal components will qualify as LSA-I, II or III or Surface Contaminated Object, SCO-I or II, as described in Title 49.^[31] The contaminated material will be packaged in Industrial Packages (IP-1, IP-2, or IP-3, as defined in subpart 173.411) for transport unless demonstrated to qualify as their own shipping containers. The reactor vessel and internal components are expected to be transported in accordance with Part 71, in Type B containers. It is conceivable that the reactor, due to its limited specific activity, could qualify as LSA II or III. However, the high radiation levels on the outer surface would require that additional shielding be incorporated within the packaging so as to attenuate the dose to levels acceptable for transport.

Any fuel cladding failure that occurred during the lifetime of the plant is assumed to have released fission products at sufficiently low levels that the buildup of quantities of long-lived isotopes (e.g., ¹³⁷Cs, ⁹⁰Sr, or

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transuranics) has been prevented from reaching levels exceeding those that permit the major reactor components to be shipped under current transportation regulations and disposal requirements.

Transport of the highly activated metal, produced in the segmentation of the reactor vessel and internal components, will be by shielded truck cask. Cask shipments may exceed 95,000 pounds, including vessel segment(s), supplementary shielding, cask tie-downs, and tractor-trailer. The maximum level of activity per shipment assumed permissible was based upon the license limits of the available shielded transport casks. The segmentation scheme for the vessel and internal segments is designed to meet these limits.

The transport of large intact components (e.g., large heat exchangers and other oversized components) will be by a combination of truck, rail, and/or multi-wheeled transporter.

Transportation costs for Class A material requiring controlled disposal are based upon the mileage to the EnergySolutions facility in Clive, Utah. Class B and C wastes use the mileage to the Waste Control Specialists (WCS) facility in Andrews County, Texas. Transportation costs for off-site waste processing are based upon the mileage to Oak Ridge, Tennessee. Truck transport costs are estimated using published tariffs from Tri-State Motor Transit.^[32]

3.5.6 Low-Level Radioactive Waste Disposal

To the greatest extent practical, metallic material generated in the decontamination and dismantling processes is processed to reduce the total cost of controlled disposal. Material meeting the regulatory and/or site release criterion, is released as scrap, requiring no further cost consideration. Conditioning (preparing the material to meet the waste acceptance criteria of the disposal site) and recovery of the waste stream is performed off site at a licensed processing center. Any material leaving the site is subject to a survey and release charge, at a minimum. Based on TLG's experience, rates were assumed for off-site processing as well as survey and release.

The mass of radioactive waste generated during the various decommissioning activities at the site is shown on a line-item basis in the detailed Appendices C, D, E and F, and summarized in Tables 5.1, 5.2 and 5.3. The quantified waste summaries shown in these tables are consistent with 10 CFR Part 61 classifications. Commercially available steel containers are presumed to be used for the disposal of piping, small

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components, and concrete. Larger components can serve as their own containers, with proper closure of all openings, access ways, and penetrations. The volumes are calculated based on the exterior package dimensions for containerized material or a specific calculation for components serving as their own waste containers.

The more highly activated reactor components will be shipped in reusable, shielded truck casks with disposable liners. In calculating disposal costs, the burial fees are applied against the liner volume, as well as the special handling requirements of the payload. Packaging efficiencies are lower for the highly activated materials (greater than Class A waste), where high concentrations of gamma-emitting radionuclides limit the capacity of the shipping canisters.

Disposal fees are based upon estimated charges, with surcharges added for the highly activated components, such as those generated in the segmentation of the reactor vessel. The cost to dispose of the lowest level and majority of the material generated from the decontamination and dismantling activities is based upon Xcel Energy's current cost for disposal at EnergySolutions facility in Clive, Utah. Disposal costs for the higher activity waste (Class B and C) were based upon indicative information from WCS for the Andrews County facility.

3.5.7 Site Conditions Following Decommissioning

The NRC will amend or terminate the site license(s) if it determines that site remediation has been performed in accordance with the license termination plan, and that the terminal radiation survey and associated documentation demonstrate that the facility is suitable for release. The NRC's involvement in the decommissioning process typically ends at this point. Building codes and environmental regulations will dictate the next step in the decommissioning process, as well as the owner's own future plans for the site.

There are varying degrees to which the Prairie Island site can be restored following the decommissioning of the two nuclear units. The estimates presented herein include the dismantling of the major structures to just below ground level, backfilling and the collapsing of below grade voids, and general regarding such that the site upon which the power block and supplemental structures are located is transformed into a "grassy plain." Xcel Energy has identified certain structures and site features that are candidates for reuse by a potential follow-on generating plant at the Prairie Island site. These structures are

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excluded from the scope of the estimates for decommissioning or site restoration.

Only existing site structures are considered in the dismantling cost. The electrical switchyard remains after Prairie Island is decommissioned in support of the regional transmission and distribution system. Structures are removed to a nominal depth of three feet below grade. The voids are backfilled with clean debris and capped with soil. The site is then re-graded to conform to the adjacent landscape. Vegetation is established to inhibit erosion. These “non-radiological costs” are included in the total cost of decommissioning.

Costs are included for the demolition of shoreline structures. Costs are not included for general restoration of the riverbank or restoration of the circulation water canals.

Bulk excavation of soil and material in the immediate vicinity of the reactor building is included to remove various duct banks, catch basins, and underground utilities that may exist.

Concrete rubble generated from demolition activities is processed and made available as clean fill for the power block foundations. Additional clean fill is brought on site to backfill below grade voids as needed. The excavations will be regraded such that the power block area will have a final contour consistent with adjacent surroundings.

The estimates do not assume the remediation of any significant volume of contaminated soil. This assumption may be affected by continued plant operations and/or future regulatory actions, such as the development of site-specific release criteria.

3.6 ASSUMPTIONS

The following are the major assumptions made in the development of the estimates for decommissioning Prairie Island.

3.6.1 Estimating Basis

The study follows the principles of ALARA through the use of work duration adjustment factors. These factors address the impact of activities such as radiological protection instruction, mock-up training, and the use of respiratory protection and protective clothing. The factors lengthen a task's duration, increasing costs and lengthening the overall

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schedule. ALARA planning is considered in the costs for engineering and planning, and in the development of activity specifications and detailed procedures. Changes to worker exposure limits may impact the decommissioning cost and project schedule.

3.6.2 Labor Costs

Xcel Energy, as the operator, will continue to provide site operations support, including decommissioning program management, licensing, radiological protection, and site security. A Decommissioning Operations Contractor (DOC) will provide the supervisory staff needed to oversee the labor subcontractors, consultants, and specialty contractors needed to perform the work required for the decontamination and dismantling effort. The DOC will also provide the engineering services needed to develop activity specifications, detailed procedures, detailed activation analyses, and support field activities such as structural modifications.

Utility labor costs were provided by Xcel Energy. Average costs were provided by department or work group and included payroll overheads. Decommissioning Operations Contractor (DOC) labor costs were based on utility labor costs with modified markups to account for employee benefits, DOC overhead and profit.

The craft labor required to decontaminate and dismantle the Prairie Island units will be acquired through standard site contracting practices. Craft labor costs were based upon information from Xcel Energy. Craft labor costs include applicable overheads and profit.

Security, while reduced from operating levels, is maintained throughout the decommissioning for access control, material control, and to safeguard the spent fuel.

Staffing levels are assigned for each unit by sub-period and functional area. Economies of a multi-unit decommissioning are recognized by establishing a primary and a secondary staff level. The unit assigned the primary staff will include common supervisory positions and positions that may be shared across both units. The types of positions and staffing levels are adjusted based upon the type of activity occurring in each sub-period.

A profile of the staffing level for Scenario 1 decommissioning, including contractors and craft, is provided in Figure 3.1. Utility staffing levels

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will gradually decrease after completing the removal of physical systems at each of the units.

Staffing levels and management support will vary based upon the amount and type of decommissioning work. Craft manpower levels decrease after systems removal and structures decontamination and drop substantially during the delay period and the license termination survey period. However, craft staff levels increase again during the site restoration period due to the work associated with structures demolition.

3.6.3 Design Conditions

Any fuel cladding failure that occurred during the lifetime of the plant is assumed to have released fission products at sufficiently low levels that the buildup of quantities of long-lived isotopes (e.g., ¹³⁷Cs, ⁹⁰Sr, or transuranics) has been prevented from reaching levels exceeding those that permit the major NSSS components to be shipped under current transportation regulations and disposal requirements.

Activation levels in the vessel and internal components are modeled using NUREG/CR-3474.^[33] Estimates are derived from the curie/gram values contained therein and adjusted for the different mass of the Prairie Island components, projected operating life(s), and different periods of decay. Additional short-lived isotopes were derived from NUREG/CR-0130^[34] and NUREG/CR-0672^[35] and benchmarked to the long-lived values from CR-3474.

It is anticipated that there will be control element assemblies (CEAs) in the spent fuel pool at the cessation of operations, including those CEAs from the final core. This analysis assumes that the CEAs can be disposed of along with the spent fuel at no additional cost (in accordance with Appendix E of the Standard Contract)

Activation of the reactor building is confined to the area around the biological shield.

3.6.4 General

Transition Activities

Existing warehouses are cleared of non-essential material and remain for use by the plant operator and its subcontractors. The plant's

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operating staff performs the following activities at no additional cost or credit to the project during the transition period.

- Drain and collect fuel oils, lubricating oils, and transformer oils for recycle and/or sale.
- Drain and collect acids, caustics, and other chemical stores for recycle and/or sale.
- Process operating waste inventories. The estimates do not address the disposition of any legacy wastes and the disposal of operating wastes during this initial period is not considered a decommissioning expense.

Scrap and Salvage

The existing plant equipment is considered obsolete and suitable for scrap as deadweight quantities only. Xcel Energy will make economically reasonable efforts to salvage equipment following final plant shutdown. However, dismantling techniques assumed for equipment in this analysis are not consistent with removal techniques required for salvage (resale) of equipment. Experience has indicated that some buyers wanted equipment stripped down to very specific requirements before they would consider purchase. This required expensive rework after the equipment had been removed from its installed location. Since placing a salvage value on this machinery and equipment would be speculative, and the value would be small in comparison to the overall decommissioning expenses, this analysis does not attempt to quantify the value that an owner may realize based upon those efforts.

It is assumed, for purposes of this analysis, that any value received from the sale of scrap generated in the dismantling process would be more than offset by the on-site processing costs. The dismantling techniques assumed in the decommissioning estimates do not include the additional cost for size reduction and preparation to meet “furnace ready” conditions. For example, the recovery of copper from electrical cabling may require the removal and disposition of any contaminated insulation, an added expense. With a volatile market, the potential profit margin in scrap recovery is highly speculative, regardless of the ability to free release this material. This assumption is an implicit recognition of scrap value. An allowance has been included for the survey and release of all metallic material released from the site.

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Furniture, tools, mobile equipment such as forklifts, trucks, bulldozers, and other property is removed at no cost or credit to the decommissioning project. Disposition may include relocation to other facilities. Spare parts are also made available for alternative use.

The concrete debris resulting from building demolition activities is crushed on site to reduce the size of the debris. The resulting crushed concrete is used to backfill below grade voids, with the excess assumed to be removed from the site as recycled material at no cost or credit to the decommissioning program. The rebar removed from the concrete crushing process is disposed of as scrap steel in a similar fashion as other scrap metal as discussed previously.

Asbestos

At the time of Prairie Island's construction, asbestos was still being used for system component and piping insulation, and as fireproofing material for structures. No inventory of asbestos at Prairie Island was available, so TLG developed an estimated quantity. The allowance for the remediation of this asbestos is captured in the detailed cost analyses (Appendices C through F).

Insurance

Costs for continuing coverage (nuclear liability and property insurance) following cessation of plant operations and during decommissioning are included and based upon current operating premiums. Reductions in premiums, throughout the decommissioning process, are based upon the guidance provided in SECY-00-0145, "Integrated Rulemaking Plan for Nuclear Power Plant Decommissioning."^[36] The NRC's financial protection requirements are based on various reactor (and spent fuel) configurations.

Xcel Energy Corporate Overhead

Corporate overhead charges for site support activities are not included in these estimates.

Site Non-Labor Overhead

These estimates include costs for site non-labor overhead charges. These costs include telephones, copy machines, computers, IT infrastructure, office supplies, janitorial supplies, training expenses, etc. Xcel Energy

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provided a two-part cost to address these costs. A variable charge of \$3,652 per person per year of the Xcel Energy staff is included throughout the estimate. A fixed annual overhead charge is also included, starting at \$1.5 million per reactor at the time of unit shut down and decreasing to approximately \$540 thousand per reactor.

Energy

For estimating purposes, the plant is assumed to be de-energized, with the exception of those facilities associated with spent fuel storage (temporary power is run throughout the plant, as needed). Replacement power costs are used to calculate the cost of energy consumed during decommissioning for tooling, lighting, ventilation, and essential services.

Taxes

Xcel Energy provided the basis for the structures and land taxes included within the estimates, including the reduction of these taxes over time.

NRC Fees

These estimates include charges from the NRC to support the Prairie Island decommissioning program. Charges are included for the yearly licenses held by Xcel Energy for the Part 50 and Part 72 licenses, as well as engineering support charges by the NRC to review activities at the site. The Part 50 license fee for a reactor in a decommissioning or possession-only status and which has spent fuel onsite is \$224 thousand per year. Once both reactors have been decommissioned, the site Part 72 license continues at the same fee until final removal of the spent fuel. The hourly rate for NRC review is \$279.00. The level of effort of NRC participation is commensurate with the decommissioning alternative and schedule; for example Scenario 2 has an estimated NRC support requirement of approximately 27,500 hours from Unit 1 shutdown until termination of the ISFSI license.

Emergency Planning Fees

These estimates include costs for emergency planning support activities. There are three separate civil emergency planning organizations assumed to be supporting Xcel Energy during the decommissioning program. The Federal Emergency Management Agency (FEMA) yearly fees are estimated at \$593,000 for the site from shutdown until

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approximately 18 months after each unit's shutdown, after which the FEMA fees are assumed to be eliminated. The fee is divided equally between each unit.

Site Modifications

The perimeter fence and in-plant security barriers will be moved, as appropriate, to conform to the site security plan in force during the various stages of the project.

3.7 COST ESTIMATE SUMMARY

Schedules of expenditures are provided in Tables 3.1 through 3.8. The tables delineate the costs by year of expenditures as well as cost contributor (e.g., labor, equipment & materials, energy, radioactive waste disposal, and other costs).

The cost elements in Tables 3.1 and 3.2 (Scenario 1) are also assigned to one of three subcategories: "License Termination," "Spent Fuel Management," and "Site Restoration." The subcategory "License Termination" is used to accumulate costs that are consistent with "decommissioning" as defined by the NRC in its financial assurance regulations (i.e., 10 CFR §50.75). In situations where the long-term management of spent fuel is not an issue, the cost reported for this subcategory is generally sufficient to terminate the unit's operating license, recognizing that there may be some additional cost impact from spent fuel management. Tables 3.1a and 3.2a list the License Termination subcategory schedule of expenditures.

The "Spent Fuel Management" subcategory contains costs associated with the containerization and transfer of spent fuel from the pool to an appropriate disposal facility or to the ISFSI for interim storage, and the transfer of the spent fuel canisters from the ISFSI. Costs are also included for the operations of the pool and the management of the ISFSI until such time that the transfer of all fuel from this facility to an off-site location (e.g., geologic repository) is complete. Tables 3.1b and 3.2b list the Spent Fuel Management subcategory schedule of expenditures.

"Site Restoration" is used to capture costs associated with the dismantling and demolition of buildings and facilities demonstrated to be free from contamination. This includes structures never exposed to radioactive materials, as well as those facilities that have been decontaminated to appropriate levels. Structures are removed to a depth of three feet and

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backfilled to conform to local grade. Tables 3.1c and 3.2c list the Site Restoration subcategory schedule of expenditures.

As discussed in Section 3.5.1, it is assumed that the DOE will not accept the GTCC waste prior to completing the transfer of spent fuel. Therefore, the cost of GTCC disposal is shown in the final year of ISFSI operation. While designated for disposal at the geologic repository along with the spent fuel, GTCC waste is still classified as low-level radioactive waste and, as such, included as a “License Termination” expense.

Tables 3.3 and 3.4 present Scenario 2 (60 years without cask replacement) for Units 1 and 2, respectively. Tables 3.5 and 3.6 present Scenario 3 (100 years with cask replacement) for Units 1 and 2, respectively. Tables 3.7 and 3.8 present Scenario 4 (200 years with cask replacement) for Units 1 and 2, respectively. The tables delineate the cost contributors by year of expenditures as well as cost contributor (e.g., labor, materials, and waste disposal).

Decommissioning costs are reported in 2014 dollars. Costs are not inflated, escalated, or discounted over the period of expenditure (or projected lifetime of the plant). The schedules are based upon the detailed activity costs reported in Appendices C through F, along with the timelines presented in Section 4.

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**TABLE 3.1
SCENARIO 1
PRAIRIE ISLAND NUCLEAR GENERATING PLANT, UNIT 1
SCHEDULE OF TOTAL ANNUAL EXPENDITURES
(thousands, 2014 dollars)**

Year	Labor	Equipment & Materials	Energy	Burial	Other	Total
2033	16,686	732	1,412	24	7,502	26,356
2034	49,136	9,422	4,966	5,038	14,098	82,660
2035	53,819	46,330	3,775	19,919	9,725	133,567
2036	44,925	27,413	2,948	21,517	8,984	105,787
2037	25,701	10,489	1,900	13,318	6,591	57,999
2038	4,103	5,766	711	37	3,996	14,613
2039	4,103	5,766	711	37	3,996	14,613
2040	4,114	5,781	713	37	4,007	14,653
2041	4,103	5,766	711	37	3,996	14,613
2042	4,103	5,766	711	37	3,996	14,613
2043	4,103	5,766	711	37	3,996	14,613
2044	4,114	5,781	713	37	4,007	14,653
2045	4,103	5,766	711	37	3,996	14,613
2046	4,103	5,766	711	37	3,996	14,613
2047	4,103	5,766	711	37	3,996	14,613
2048	4,114	5,781	713	37	4,007	14,653
2049	7,618	5,572	836	786	4,281	19,093
2050	22,684	3,299	1,141	2,627	4,244	33,995
2051	15,779	4,314	481	16	1,678	22,268
2052	13,272	6,027	356	0	1,434	21,090
2053	7,438	2,832	167	0	1,337	11,774
2054	2,439	505	0	0	1,254	4,197
2055	2,271	0	0	0	1,254	3,524
2056	2,277	0	0	0	1,257	3,534
2057	2,439	505	0	0	1,254	4,197
2058	2,271	0	0	0	1,254	3,524
2059	2,439	505	0	0	1,254	4,197
2060	2,277	0	0	0	1,257	3,534
2061	2,439	505	0	0	1,254	4,197
2062	2,271	0	0	0	1,254	3,524
2063	2,439	505	0	0	1,254	4,197
2064	2,277	0	0	0	1,257	3,534
2065	2,439	1,967	0	0	10,842	15,247

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TABLE 3.1 (continued)
SCENARIO 1
PRAIRIE ISLAND NUCLEAR GENERATING PLANT, UNIT 1
SCHEDULE OF TOTAL ANNUAL EXPENDITURES
(thousands, 2014 dollars)

Year	Labor	Equipment & Materials	Energy	Burial	Other	Total
2066	726	304	59	3	1,202	2,294
Total	331,225	184,692	25,868	63,652	129,710	735,147

Note: Columns may not add due to rounding

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**TABLE 3.1a
SCENARIO 1
PRAIRIE ISLAND NUCLEAR GENERATING PLANT, UNIT 1
SCHEDULE OF LICENSE TERMINATION EXPENDITURES
(thousands, 2014 dollars)**

Year	Labor	Equipment & Materials	Energy	Burial	Other	Total
2033	16,451	732	1,412	24	6,627	25,246
2034	47,677	8,041	4,966	5,038	11,894	77,617
2035	48,728	35,592	3,775	19,919	7,500	115,514
2036	40,513	19,575	2,948	21,517	6,966	91,519
2037	22,504	5,008	1,900	13,318	4,714	47,444
2038	1,833	222	711	37	2,119	4,922
2039	1,833	222	711	37	2,119	4,922
2040	1,838	223	713	37	2,125	4,935
2041	1,833	222	711	37	2,119	4,922
2042	1,833	222	711	37	2,119	4,922
2043	1,833	222	711	37	2,119	4,922
2044	1,838	223	713	37	2,125	4,935
2045	1,833	222	711	37	2,119	4,922
2046	1,833	222	711	37	2,119	4,922
2047	1,833	222	711	37	2,119	4,922
2048	1,838	223	713	37	2,125	4,935
2049	5,746	1,000	836	786	2,483	10,852
2050	22,652	3,205	1,141	2,627	3,309	32,935
2051	7,255	343	251	16	688	8,553
2052	96	0	0	0	0	96
2053	45	0	0	0	0	45
2054-64	0	0	0	0	0	0
2065	0	1,462	0	0	9,588	11,050
2066	433	1	0	3	1,035	1,471
Total	232,276	77,407	25,055	63,652	78,131	476,522

Note: Columns may not add due to rounding

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**TABLE 3.1b
SCENARIO 1
PRAIRIE ISLAND NUCLEAR GENERATING PLANT, UNIT 1
SCHEDULE OF SPENT FUEL MANAGEMENT EXPENDITURES
(thousands, 2014 dollars)**

Year	Labor	Equipment & Materials	Energy	Burial	Other	Total
2033	0	0	0	0	851	851
2034	460	1,380	0	0	2,142	3,982
2035	3,565	10,694	0	0	1,851	16,110
2036	2,597	7,791	0	0	1,821	12,210
2037	1,984	5,454	0	0	1,816	9,254
2038	2,270	5,543	0	0	1,816	9,630
2039	2,270	5,543	0	0	1,816	9,630
2040	2,276	5,558	0	0	1,821	9,656
2041	2,270	5,543	0	0	1,816	9,630
2042	2,270	5,543	0	0	1,816	9,630
2043	2,270	5,543	0	0	1,816	9,630
2044	2,276	5,558	0	0	1,821	9,656
2045	2,270	5,543	0	0	1,816	9,630
2046	2,270	5,543	0	0	1,816	9,630
2047	2,270	5,543	0	0	1,816	9,630
2048	2,276	5,558	0	0	1,821	9,656
2049	1,872	4,571	0	0	1,736	8,180
2050	31	94	0	0	873	999
2051	1,128	184	0	0	814	2,125
2052	1,705	154	0	0	1,194	3,054
2053	2,002	72	0	0	1,224	3,299
2054	2,439	505	0	0	1,254	4,197
2055	2,271	0	0	0	1,254	3,524
2056	2,277	0	0	0	1,257	3,534
2057	2,439	505	0	0	1,254	4,197
2058	2,271	0	0	0	1,254	3,524
2059	2,439	505	0	0	1,254	4,197
2060	2,277	0	0	0	1,257	3,534
2061	2,439	505	0	0	1,254	4,197
2062	2,271	0	0	0	1,254	3,524
2063	2,439	505	0	0	1,254	4,197
2064	2,277	0	0	0	1,257	3,534
2065	2,439	505	0	0	1,254	4,197
Total	68,609	94,445	0	0	49,368	212,421

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**TABLE 3.1c
SCENARIO 1
PRAIRIE ISLAND NUCLEAR GENERATING PLANT, UNIT 1
SCHEDULE OF SITE RESTORATION EXPENDITURES
(thousands, 2014 dollars)**

Year	Labor	Equipment & Materials	Energy	Burial	Other	Total
2033	234	0	0	0	24	259
2034	999	0	0	0	61	1,060
2035	1,526	44	0	0	374	1,944
2036	1,815	47	0	0	197	2,059
2037	1,214	27	0	0	61	1,302
2038	0	0	0	0	61	61
2039	0	0	0	0	61	61
2040	0	0	0	0	62	62
2041	0	0	0	0	61	61
2042	0	0	0	0	61	61
2043	0	0	0	0	61	61
2044	0	0	0	0	62	62
2045	0	0	0	0	61	61
2046	0	0	0	0	61	61
2047	0	0	0	0	61	61
2048	0	0	0	0	62	62
2049	0	0	0	0	61	61
2050	0	0	0	0	61	61
2051	7,397	3,787	230	0	176	11,589
2052	11,471	5,873	356	0	239	17,940
2053	5,391	2,760	167	0	112	8,431
2054-65	0	0	0	0	0	0
2066	293	303	59	0	167	823
Total	30,340	12,841	813	0	2,210	46,204

Note: Columns may not add due to rounding

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**TABLE 3.2
SCENARIO 1
PRAIRIE ISLAND NUCLEAR GENERATING PLANT, UNIT 2
SCHEDULE OF TOTAL ANNUAL EXPENDITURES
(thousands, 2014 dollars)**

Year	Labor	Equipment & Materials	Energy	Burial	Other	Total
2034	7,324	2,687	623	10	2,517	13,161
2035	43,406	16,293	4,178	2,254	12,987	79,117
2036	55,529	33,335	4,613	18,358	8,813	120,647
2037	56,604	27,816	3,061	20,955	9,030	117,466
2038	55,534	13,436	2,666	20,781	7,958	100,375
2039	15,823	6,610	850	1,518	4,212	29,012
2040	12,812	6,103	713	41	3,935	23,604
2041	12,777	6,086	711	41	3,925	23,539
2042	12,777	6,086	711	41	3,925	23,539
2043	12,777	6,086	711	41	3,925	23,539
2044	12,812	6,103	713	41	3,935	23,604
2045	12,777	6,086	711	41	3,925	23,539
2046	12,777	6,086	711	41	3,925	23,539
2047	12,777	6,086	711	41	3,925	23,539
2048	12,812	6,103	713	41	3,935	23,604
2049	15,420	5,973	836	884	4,178	27,290
2050	27,212	3,887	1,141	2,953	4,005	39,197
2051	19,685	5,804	481	16	1,601	27,587
2052	16,152	8,180	356	0	1,436	26,123
2053	8,791	3,844	167	0	1,338	14,140
2054	2,439	505	0	0	1,254	4,197
2055	2,271	0	0	0	1,254	3,524
2056	2,277	0	0	0	1,257	3,534
2057	2,439	505	0	0	1,254	4,197
2058	2,271	0	0	0	1,254	3,524
2059	2,439	505	0	0	1,254	4,197
2060	2,277	0	0	0	1,257	3,534
2061	2,439	505	0	0	1,254	4,197
2062	2,271	0	0	0	1,254	3,524
2063	2,439	505	0	0	1,254	4,197
2064	2,277	0	0	0	1,257	3,534
2065	2,439	1,601	0	0	9,855	13,895

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TABLE 3.2 (continued)
SCENARIO 1
PRAIRIE ISLAND NUCLEAR GENERATING PLANT, UNIT 2
SCHEDULE OF TOTAL ANNUAL EXPENDITURES
(thousands, 2014 dollars)

Year	Labor	Equipment & Materials	Energy	Burial	Other	Total
2066	726	183	0	3	1,202	2,113
Total	465,575	186,997	25,377	68,096	118,286	864,331

Note: Columns may not add due to rounding

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**TABLE 3.2a
SCENARIO 1
PRAIRIE ISLAND NUCLEAR GENERATING PLANT, UNIT 2
SCHEDULE OF LICENSE TERMINATION EXPENDITURES
(thousands, 2014 dollars)**

Year	Labor	Equipment & Materials	Energy	Burial	Other	Total
2034	6,489	317	623	10	2,131	9,570
2035	39,012	4,101	4,178	2,254	10,784	60,329
2036	52,271	28,004	4,613	18,358	6,588	109,834
2037	53,304	23,388	3,061	20,955	6,958	107,666
2038	52,521	9,733	2,666	20,781	6,081	91,782
2039	9,427	930	850	1,518	2,335	15,059
2040	6,138	255	713	41	2,053	9,200
2041	6,122	254	711	41	2,047	9,175
2042	6,122	254	711	41	2,047	9,175
2043	6,122	254	711	41	2,047	9,175
2044	6,138	255	713	41	2,053	9,200
2045	6,122	254	711	41	2,047	9,175
2046	6,122	254	711	41	2,047	9,175
2047	6,122	254	711	41	2,047	9,175
2048	6,138	255	713	41	2,053	9,200
2049	9,932	1,164	836	884	2,380	15,195
2050	27,180	3,793	1,141	2,953	3,070	38,137
2051	9,269	445	251	16	609	10,591
2052	41	0	0	0	0	41
2053	19	0	0	0	0	19
2054-64	0	0	0	0	0	0
2065	0	1,097	0	0	8,602	9,698
2066	433	1	0	3	1,035	1,471
Total	315,043	75,264	24,623	68,096	69,015	552,040

Note: Columns may not add due to rounding

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**TABLE 3.2b
SCENARIO 1
PRAIRIE ISLAND NUCLEAR GENERATING PLANT, UNIT 2
SCHEDULE OF SPENT FUEL MANAGEMENT EXPENDITURES
(thousands, 2014 dollars)**

Year	Labor	Equipment & Materials	Energy	Burial	Other	Total
2034	790	2,370	0	0	376	3,536
2035	4,064	12,192	0	0	2,142	18,397
2036	1,763	5,289	0	0	1,928	8,981
2037	1,459	4,377	0	0	1,816	7,651
2038	1,221	3,662	0	0	1,816	6,699
2039	6,268	5,677	0	0	1,816	13,762
2040	6,673	5,848	0	0	1,821	14,342
2041	6,655	5,832	0	0	1,816	14,303
2042	6,655	5,832	0	0	1,816	14,303
2043	6,655	5,832	0	0	1,816	14,303
2044	6,673	5,848	0	0	1,821	14,342
2045	6,655	5,832	0	0	1,816	14,303
2046	6,655	5,832	0	0	1,816	14,303
2047	6,655	5,832	0	0	1,816	14,303
2048	6,673	5,848	0	0	1,821	14,342
2049	5,488	4,809	0	0	1,736	12,034
2050	31	94	0	0	873	999
2051	1,128	184	0	0	814	2,125
2052	1,705	154	0	0	1,194	3,054
2053	2,002	72	0	0	1,224	3,299
2054	2,439	505	0	0	1,254	4,197
2055	2,271	0	0	0	1,254	3,524
2056	2,277	0	0	0	1,257	3,534
2057	2,439	505	0	0	1,254	4,197
2058	2,271	0	0	0	1,254	3,524
2059	2,439	505	0	0	1,254	4,197
2060	2,277	0	0	0	1,257	3,534
2061	2,439	505	0	0	1,254	4,197
2062	2,271	0	0	0	1,254	3,524
2063	2,439	505	0	0	1,254	4,197
2064	2,277	0	0	0	1,257	3,534
2065	2,439	505	0	0	1,254	4,197
Total	114,145	94,445	0	0	47,149	255,739

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**TABLE 3.2c
SCENARIO 1
PRAIRIE ISLAND NUCLEAR GENERATING PLANT, UNIT 2
SCHEDULE OF SITE RESTORATION EXPENDITURES
(thousands, 2014 dollars)**

Year	Labor	Equipment & Materials	Energy	Burial	Other	Total
2034	44	0	0	0	11	55
2035	329	0	0	0	61	391
2036	1,494	41	0	0	297	1,833
2037	1,841	52	0	0	256	2,149
2038	1,793	40	0	0	61	1,895
2039	128	3	0	0	61	192
2040	0	0	0	0	62	62
2041	0	0	0	0	61	61
2042	0	0	0	0	61	61
2043	0	0	0	0	61	61
2044	0	0	0	0	62	62
2045	0	0	0	0	61	61
2046	0	0	0	0	61	61
2047	0	0	0	0	61	61
2048	0	0	0	0	62	62
2049	0	0	0	0	61	61
2050	0	0	0	0	61	61
2051	9,289	5,175	230	0	177	14,871
2052	14,405	8,025	356	0	241	23,029
2053	6,770	3,771	167	0	113	10,822
2054-65	0	0	0	0	0	0
2066	293	182	0	0	167	642
Total	36,386	17,289	754	0	2,123	56,552

Note: Columns may not add due to rounding

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**TABLE 3.3
SCENARIO 2
PRAIRIE ISLAND NUCLEAR GENERATING PLANT, UNIT 1
SCHEDULE OF TOTAL ANNUAL EXPENDITURES
(thousands, 2014 dollars)**

Year	Labor	Equipment & Materials	Energy	Burial	Other	Total
2033	16,686	732	1,412	24	7,502	26,356
2034	49,122	9,379	4,966	5,038	14,098	82,603
2035	53,949	46,719	3,775	19,919	9,725	134,087
2036	45,206	28,255	2,948	21,517	8,984	106,909
2037	26,500	12,887	1,900	13,318	6,591	61,196
2038	2,255	222	711	37	3,996	7,221
2039	3,918	5,212	711	37	3,996	13,874
2040	2,261	223	713	37	4,007	7,241
2041	5,582	10,201	711	37	3,996	20,527
2042	2,255	222	711	37	3,996	7,221
2043	5,582	10,201	711	37	3,996	20,527
2044	2,261	223	713	37	4,007	7,241
2045	5,582	10,201	711	37	3,996	20,527
2046	2,255	222	711	37	3,996	7,221
2047	5,582	10,201	711	37	3,996	20,527
2048	2,261	223	713	37	4,007	7,241
2049	11,084	15,969	836	786	4,281	32,955
2050	22,668	3,252	1,141	2,627	4,244	33,933
2051	15,824	4,448	481	16	1,678	22,447
2052	13,364	6,301	356	0	1,434	21,455
2053	7,570	3,228	167	0	1,337	12,302
2054	2,481	631	0	0	1,254	4,365
2055	2,397	378	0	0	1,254	4,029
2056	2,529	757	0	0	1,257	4,543
2057	2,397	378	0	0	1,254	4,029
2058	2,355	252	0	0	1,254	3,861
2059	2,439	505	0	0	1,254	4,197
2060	2,403	378	0	0	1,257	4,038
2061	2,439	505	0	0	1,254	4,197
2062	2,439	505	0	0	1,254	4,197
2063	2,439	505	0	0	1,254	4,197
2064	2,403	378	0	0	1,257	4,038
2065	2,439	505	0	0	1,254	4,197

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TABLE 3.3 (continued)
SCENARIO 2
PRAIRIE ISLAND NUCLEAR GENERATING PLANT, UNIT 1
SCHEDULE OF TOTAL ANNUAL EXPENDITURES
(thousands, 2014 dollars)

Year	Labor	Equipment & Materials	Energy	Burial	Other	Total
2066	2,439	505	0	0	1,254	4,197
2067	2,397	378	0	0	1,254	4,029
2068	2,445	505	0	0	1,257	4,207
2069	2,439	505	0	0	1,254	4,197
2070	2,397	378	0	0	1,254	4,029
2071	2,439	505	0	0	1,254	4,197
2072	2,445	505	0	0	1,257	4,207
2073	2,397	378	0	0	1,254	4,029
2074	2,439	505	0	0	1,254	4,197
2075	2,746	1,425	0	0	1,254	5,424
2076	2,403	378	0	0	1,257	4,038
2077	2,397	1,841	0	0	10,842	15,079
2078	726	304	59	3	1,202	2,294
Total	361,029	192,309	25,868	63,652	144,764	787,621

Note: Columns may not add due to rounding

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**TABLE 3.4
SCENARIO 2
PRAIRIE ISLAND NUCLEAR GENERATING PLANT, UNIT 2
SCHEDULE OF TOTAL ANNUAL EXPENDITURES
(thousands, 2014 dollars)**

Year	Labor	Equipment & Materials	Energy	Burial	Other	Total
2034	7,299	2,614	623	10	2,517	13,064
2035	43,382	16,222	4,178	2,254	12,987	79,023
2036	55,974	34,671	4,613	18,358	8,813	122,430
2037	56,757	28,273	3,061	20,955	9,030	118,076
2038	55,366	12,931	2,666	20,781	7,958	99,703
2039	15,550	5,791	850	1,518	4,212	27,921
2040	10,863	255	713	41	3,935	15,806
2041	14,159	10,233	711	41	3,925	29,068
2042	10,833	254	711	41	3,925	15,763
2043	14,159	10,233	711	41	3,925	29,068
2044	10,863	255	713	41	3,935	15,806
2045	14,159	10,233	711	41	3,925	29,068
2046	10,833	254	711	41	3,925	15,763
2047	14,159	10,233	711	41	3,925	29,068
2048	10,863	255	713	41	3,935	15,806
2049	18,806	16,133	836	884	4,178	40,836
2050	27,196	3,840	1,141	2,953	4,005	39,135
2051	19,730	5,938	481	16	1,601	27,766
2052	16,243	8,453	356	0	1,436	26,489
2053	8,923	4,239	167	0	1,338	14,667
2054	2,481	631	0	0	1,254	4,365
2055	2,397	378	0	0	1,254	4,029
2056	2,529	757	0	0	1,257	4,543
2057	2,397	378	0	0	1,254	4,029
2058	2,355	252	0	0	1,254	3,861
2059	2,439	505	0	0	1,254	4,197
2060	2,403	378	0	0	1,257	4,038
2061	2,439	505	0	0	1,254	4,197
2062	2,439	505	0	0	1,254	4,197
2063	2,439	505	0	0	1,254	4,197
2064	2,403	378	0	0	1,257	4,038
2065	2,439	505	0	0	1,254	4,197

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TABLE 3.4 (continued)
SCENARIO 2
PRAIRIE ISLAND NUCLEAR GENERATING PLANT, UNIT 2
SCHEDULE OF TOTAL ANNUAL EXPENDITURES
(thousands, 2014 dollars)

Year	Labor	Equipment & Materials	Energy	Burial	Other	Total
2066	2,439	505	0	0	1,254	4,197
2067	2,397	378	0	0	1,254	4,029
2068	2,445	505	0	0	1,257	4,207
2069	2,439	505	0	0	1,254	4,197
2070	2,397	378	0	0	1,254	4,029
2071	2,439	505	0	0	1,254	4,197
2072	2,445	505	0	0	1,257	4,207
2073	2,397	378	0	0	1,254	4,029
2074	2,439	505	0	0	1,254	4,197
2075	2,746	1,425	0	0	1,254	5,424
2076	2,403	378	0	0	1,257	4,038
2077	2,397	1,475	0	0	9,855	13,727
2078	726	183	0	3	1,202	2,113
Total	495,379	194,614	25,377	68,096	133,340	916,805

Note: Columns may not add due to rounding

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**TABLE 3.5
SCENARIO 3
PRAIRIE ISLAND NUCLEAR GENERATING PLANT, UNIT 1
SCHEDULE OF TOTAL ANNUAL EXPENDITURES
(thousands, 2014 dollars)**

Year	Labor	Equipment & Materials	Energy	Burial	Other	Total
2033	16,686	732	1,412	24	7,502	26,356
2034	49,122	9,379	4,966	5,038	14,098	82,603
2035	53,949	46,719	3,775	19,919	9,725	134,087
2036	45,206	28,255	2,948	21,517	8,984	106,909
2037	26,500	12,887	1,900	13,318	6,591	61,196
2038	2,255	222	711	37	3,996	7,221
2039	3,918	5,212	711	37	3,996	13,874
2040	2,261	223	713	37	4,007	7,241
2041	5,582	10,201	711	37	3,996	20,527
2042	2,255	222	711	37	3,996	7,221
2043	5,582	10,201	711	37	3,996	20,527
2044	2,261	223	713	37	4,007	7,241
2045	5,582	10,201	711	37	3,996	20,527
2046	2,255	222	711	37	3,996	7,221
2047	5,582	10,201	711	37	3,996	20,527
2048	2,261	223	713	37	4,007	7,241
2049	11,312	16,652	836	786	4,281	33,867
2050	23,788	6,610	1,141	2,627	4,244	38,410
2051	17,742	10,064	481	16	1,609	29,911
2052	15,875	13,622	356	972	1,326	32,151
2053	10,886	12,291	167	972	1,321	25,637
2054	6,478	11,139	0	972	1,319	19,907
2055	6,478	11,139	0	972	1,319	19,907
2056	5,393	7,863	0	686	1,323	15,265
2057	4,512	5,242	0	457	1,319	11,530
2058	4,512	5,242	0	457	1,319	11,530
2059	2,765	0	0	0	1,319	4,084
2060	5,393	7,863	0	686	1,323	15,265
2061	4,512	5,242	0	457	1,319	11,530
2062	5,386	7,863	0	686	1,319	15,253
2063	5,386	7,863	0	686	1,319	15,253
2064	2,773	0	0	0	1,323	4,095
2065	4,512	5,242	0	457	1,319	11,530

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TABLE 3.5 (continued)
SCENARIO 3
PRAIRIE ISLAND NUCLEAR GENERATING PLANT, UNIT 1
SCHEDULE OF TOTAL ANNUAL EXPENDITURES
(thousands, 2014 dollars)

Year	Labor	Equipment & Materials	Energy	Burial	Other	Total
2066	2,765	0	0	0	1,319	4,084
2067	5,386	7,863	0	686	1,319	15,253
2068	4,520	5,242	0	457	1,323	11,541
2069	2,765	0	0	0	1,319	4,084
2070	5,386	7,863	0	686	1,319	15,253
2071	4,512	5,242	0	457	1,319	11,530
2072	2,773	0	0	0	1,323	4,095
2073	4,512	5,242	0	457	1,319	11,530
2074	5,693	8,783	0	686	1,319	16,481
2075	2,765	0	0	0	1,319	4,084
2076	4,520	5,242	0	457	1,323	11,541
2077	5,386	7,863	0	686	1,319	15,253
2078	2,765	0	0	0	1,319	4,084
2079	4,512	5,242	0	457	1,319	11,530
2080	4,520	5,242	0	457	1,323	11,541
2081	2,765	0	0	0	1,319	4,084
2082	3,639	2,621	0	229	1,319	7,807
2083	2,765	0	0	0	1,319	4,084
2084	2,773	0	0	0	1,323	4,095
2085	4,512	5,242	0	457	1,319	11,530
2086	8,007	15,725	0	1,372	1,319	26,423
2087	2,765	0	0	0	1,319	4,084
2088	6,267	10,483	0	914	1,323	18,988
2089	2,765	0	0	0	1,319	4,084
2090	4,512	5,242	0	457	1,319	11,530
2091	2,355	252	0	0	1,262	3,869
2092	5,939	10,988	0	914	1,266	19,107
2093	2,439	505	0	0	1,262	4,205
2094	5,975	11,114	0	914	1,262	19,266
2095	2,397	378	0	0	1,262	4,037
2096	6,023	11,240	0	914	1,266	19,444
2097	2,397	378	0	0	1,262	4,037
2098	5,849	10,736	0	914	1,262	18,761

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TABLE 3.5 (continued)
SCENARIO 3
PRAIRIE ISLAND NUCLEAR GENERATING PLANT, UNIT 1
SCHEDULE OF TOTAL ANNUAL EXPENDITURES
(thousands, 2014 dollars)

Year	Labor	Equipment & Materials	Energy	Burial	Other	Total
2099	2,439	505	0	0	1,262	4,205
2100	7,638	16,104	0	1,229	1,262	26,233
2101	2,439	505	0	0	1,262	4,205
2102	2,439	505	0	0	1,262	4,205
2103	2,439	505	0	0	1,262	4,205
2104	2,710	1,299	0	0	1,266	5,274
2105	2,439	505	0	0	1,262	4,205
2106	2,439	505	0	0	1,262	4,205
2107	2,397	378	0	0	1,262	4,037
2108	2,445	505	0	0	1,266	4,215
2109	2,439	505	0	0	1,262	4,205
2110	2,397	378	0	0	1,262	4,037
2111	2,439	505	0	0	1,262	4,205
2112	2,445	505	0	0	1,266	4,215
2113	2,397	378	0	0	1,262	4,037
2114	2,439	505	0	0	1,262	4,205
2115	2,439	505	0	0	1,262	4,205
2116	2,403	378	0	0	1,266	4,047
2117	2,397	1,841	0	0	10,850	15,087
2118	726	304	59	3	1,202	2,294
Total	558,222	455,099	25,868	85,912	197,398	1,322,501

Note: Columns may not add due to rounding

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**TABLE 3.6
SCENARIO 3
PRAIRIE ISLAND NUCLEAR GENERATING PLANT, UNIT 2
SCHEDULE OF TOTAL ANNUAL EXPENDITURES
(thousands, 2014 dollars)**

Year	Labor	Equipment & Materials	Energy	Burial	Other	Total
2034	7,299	2,614	623	10	2,517	13,064
2035	43,382	16,222	4,178	2,254	12,987	79,023
2036	55,974	34,671	4,613	18,358	8,813	122,430
2037	56,757	28,273	3,061	20,955	9,030	118,076
2038	55,366	12,931	2,666	20,781	7,958	99,703
2039	15,550	5,791	850	1,518	4,212	27,921
2040	10,863	255	713	41	3,935	15,806
2041	14,159	10,233	711	41	3,925	29,068
2042	10,833	254	711	41	3,925	15,763
2043	14,159	10,233	711	41	3,925	29,068
2044	10,863	255	713	41	3,935	15,806
2045	14,159	10,233	711	41	3,925	29,068
2046	10,833	254	711	41	3,925	15,763
2047	14,159	10,233	711	41	3,925	29,068
2048	10,863	255	713	41	3,935	15,806
2049	19,034	16,816	836	884	4,178	41,747
2050	28,315	7,198	1,141	2,953	4,005	43,612
2051	21,648	11,554	481	16	1,531	35,229
2052	18,754	15,775	356	972	1,328	37,185
2053	12,239	13,303	167	972	1,322	28,002
2054	6,478	11,139	0	972	1,319	19,907
2055	6,478	11,139	0	972	1,319	19,907
2056	5,393	7,863	0	686	1,323	15,265
2057	4,512	5,242	0	457	1,319	11,530
2058	4,512	5,242	0	457	1,319	11,530
2059	2,765	0	0	0	1,319	4,084
2060	5,393	7,863	0	686	1,323	15,265
2061	4,512	5,242	0	457	1,319	11,530
2062	5,386	7,863	0	686	1,319	15,253
2063	5,386	7,863	0	686	1,319	15,253
2064	2,773	0	0	0	1,323	4,095
2065	4,512	5,242	0	457	1,319	11,530

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TABLE 3.6 (continued)
SCENARIO 3
PRAIRIE ISLAND NUCLEAR GENERATING PLANT, UNIT 2
SCHEDULE OF TOTAL ANNUAL EXPENDITURES
(thousands, 2014 dollars)

Year	Labor	Equipment & Materials	Energy	Burial	Other	Total
2066	2,765	0	0	0	1,319	4,084
2067	5,386	7,863	0	686	1,319	15,253
2068	4,520	5,242	0	457	1,323	11,541
2069	2,765	0	0	0	1,319	4,084
2070	5,386	7,863	0	686	1,319	15,253
2071	4,512	5,242	0	457	1,319	11,530
2072	2,773	0	0	0	1,323	4,095
2073	4,512	5,242	0	457	1,319	11,530
2074	5,693	8,783	0	686	1,319	16,481
2075	2,765	0	0	0	1,319	4,084
2076	4,520	5,242	0	457	1,323	11,541
2077	5,386	7,863	0	686	1,319	15,253
2078	2,765	0	0	0	1,319	4,084
2079	4,512	5,242	0	457	1,319	11,530
2080	4,520	5,242	0	457	1,323	11,541
2081	2,765	0	0	0	1,319	4,084
2082	3,639	2,621	0	229	1,319	7,807
2083	2,765	0	0	0	1,319	4,084
2084	2,773	0	0	0	1,323	4,095
2085	4,512	5,242	0	457	1,319	11,530
2086	8,007	15,725	0	1,372	1,319	26,423
2087	2,765	0	0	0	1,319	4,084
2088	6,267	10,483	0	914	1,323	18,988
2089	2,765	0	0	0	1,319	4,084
2090	4,512	5,242	0	457	1,319	11,530
2091	2,355	252	0	0	1,262	3,869
2092	5,939	10,988	0	914	1,266	19,107
2093	2,439	505	0	0	1,262	4,205
2094	5,975	11,114	0	914	1,262	19,266
2095	2,397	378	0	0	1,262	4,037
2096	6,023	11,240	0	914	1,266	19,444
2097	2,397	378	0	0	1,262	4,037
2098	5,849	10,736	0	914	1,262	18,761

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TABLE 3.6 (continued)
SCENARIO 3
PRAIRIE ISLAND NUCLEAR GENERATING PLANT, UNIT 2
SCHEDULE OF TOTAL ANNUAL EXPENDITURES
(thousands, 2014 dollars)

Year	Labor	Equipment & Materials	Energy	Burial	Other	Total
2099	2,439	505	0	0	1,262	4,205
2100	7,638	16,104	0	1,229	1,262	26,233
2101	2,439	505	0	0	1,262	4,205
2102	2,439	505	0	0	1,262	4,205
2103	2,439	505	0	0	1,262	4,205
2104	2,710	1,299	0	0	1,266	5,274
2105	2,439	505	0	0	1,262	4,205
2106	2,439	505	0	0	1,262	4,205
2107	2,397	378	0	0	1,262	4,037
2108	2,445	505	0	0	1,266	4,215
2109	2,439	505	0	0	1,262	4,205
2110	2,397	378	0	0	1,262	4,037
2111	2,439	505	0	0	1,262	4,205
2112	2,445	505	0	0	1,266	4,215
2113	2,397	378	0	0	1,262	4,037
2114	2,439	505	0	0	1,262	4,205
2115	2,439	505	0	0	1,262	4,205
2116	2,403	378	0	0	1,266	4,047
2117	2,397	1,475	0	0	9,864	13,736
2118	726	183	0	3	1,202	2,113
Total	692,572	457,404	25,377	90,356	185,975	1,451,684

Note: Columns may not add due to rounding

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**TABLE 3.7
SCENARIO 4
PRAIRIE ISLAND NUCLEAR GENERATING PLANT, UNIT 1
SCHEDULE OF TOTAL ANNUAL EXPENDITURES
(thousands, 2014 dollars)**

Year	Labor	Equipment & Materials	Energy	Burial	Other	Total
2033	16,686	732	1,412	24	7,502	26,356
2034	49,122	9,379	4,966	5,038	14,098	82,603
2035	53,949	46,719	3,775	19,919	9,725	134,087
2036	45,206	28,255	2,948	21,517	8,984	106,909
2037	26,500	12,887	1,900	13,318	6,591	61,196
2038	2,255	222	711	37	3,996	7,221
2039	3,918	5,212	711	37	3,996	13,874
2040	2,261	223	713	37	4,007	7,241
2041	5,582	10,201	711	37	3,996	20,527
2042	2,255	222	711	37	3,996	7,221
2043	5,582	10,201	711	37	3,996	20,527
2044	2,261	223	713	37	4,007	7,241
2045	5,582	10,201	711	37	3,996	20,527
2046	2,255	222	711	37	3,996	7,221
2047	5,582	10,201	711	37	3,996	20,527
2048	2,261	223	713	37	4,007	7,241
2049	11,312	16,652	836	786	4,281	33,867
2050	23,788	6,610	1,141	2,627	4,244	38,410
2051	17,742	10,064	481	16	1,609	29,911
2052	15,875	13,622	356	0	1,326	31,179
2053	10,886	12,291	167	986	1,314	25,645
2054	6,478	11,139	0	986	1,307	19,910
2055	6,478	11,139	0	986	1,307	19,910
2056	5,393	7,863	0	696	1,311	15,263
2057	4,512	5,242	0	464	1,307	11,525
2058	4,512	5,242	0	464	1,307	11,525
2059	2,765	0	0	0	1,307	4,072
2060	5,393	7,863	0	696	1,311	15,263
2061	4,512	5,242	0	464	1,307	11,525
2062	5,386	7,863	0	696	1,307	15,252
2063	5,386	7,863	0	696	1,307	15,252
2064	2,773	0	0	0	1,311	4,083
2065	4,512	5,242	0	464	1,307	11,525

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TABLE 3.7 (continued)
SCENARIO 4
PRAIRIE ISLAND NUCLEAR GENERATING PLANT, UNIT 1
SCHEDULE OF TOTAL ANNUAL EXPENDITURES
(thousands, 2014 dollars)

Year	Labor	Equipment & Materials	Energy	Burial	Other	Total
2066	2,765	0	0	0	1,307	4,072
2067	5,386	7,863	0	696	1,307	15,252
2068	4,520	5,242	0	464	1,311	11,536
2069	2,765	0	0	0	1,307	4,072
2070	5,386	7,863	0	696	1,307	15,252
2071	4,512	5,242	0	464	1,307	11,525
2072	2,773	0	0	0	1,311	4,083
2073	4,512	5,242	0	464	1,307	11,525
2074	5,386	7,863	0	696	1,307	15,252
2075	3,072	921	0	0	1,307	5,300
2076	4,520	5,242	0	464	1,311	11,536
2077	5,386	7,863	0	696	1,307	15,252
2078	2,765	0	0	0	1,307	4,072
2079	4,512	5,242	0	464	1,307	11,525
2080	4,520	5,242	0	464	1,311	11,536
2081	2,765	0	0	0	1,307	4,072
2082	3,639	2,621	0	232	1,307	7,799
2083	2,765	0	0	0	1,307	4,072
2084	2,773	0	0	0	1,311	4,083
2085	4,512	5,242	0	464	1,307	11,525
2086	8,007	15,725	0	1,392	1,307	26,431
2087	2,765	0	0	0	1,307	4,072
2088	6,267	10,483	0	928	1,311	18,989
2089	2,765	0	0	0	1,307	4,072
2090	4,512	5,242	0	464	1,307	11,525
2091	2,765	0	0	0	1,307	4,072
2092	6,267	10,483	0	928	1,311	18,989
2093	2,765	0	0	0	1,307	4,072
2094	6,259	10,483	0	928	1,307	18,978
2095	2,765	0	0	0	1,307	4,072
2096	6,267	10,483	0	928	1,311	18,989
2097	2,765	0	0	0	1,307	4,072
2098	6,259	10,483	0	928	1,307	18,978

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Decommissioning Cost Analysis***

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TABLE 3.7 (continued)
SCENARIO 4
PRAIRIE ISLAND NUCLEAR GENERATING PLANT, UNIT 1
SCHEDULE OF TOTAL ANNUAL EXPENDITURES
(thousands, 2014 dollars)

Year	Labor	Equipment & Materials	Energy	Burial	Other	Total
2099	2,765	0	0	0	1,307	4,072
2100	8,007	15,725	0	1,247	1,307	26,286
2101	2,765	0	0	0	1,307	4,072
2102	6,478	11,139	0	986	1,307	19,910
2103	6,478	11,139	0	986	1,307	19,910
2104	6,485	11,139	0	986	1,311	19,921
2105	6,478	11,139	0	986	1,307	19,910
2106	5,386	7,863	0	696	1,307	15,252
2107	4,512	5,242	0	464	1,307	11,525
2108	4,520	5,242	0	464	1,311	11,536
2109	2,765	0	0	0	1,307	4,072
2110	5,386	7,863	0	696	1,307	15,252
2111	4,512	5,242	0	464	1,307	11,525
2112	5,393	7,863	0	696	1,311	15,263
2113	5,386	7,863	0	696	1,307	15,252
2114	2,765	0	0	0	1,307	4,072
2115	4,819	6,162	0	464	1,307	12,753
2116	2,773	0	0	0	1,311	4,083
2117	5,386	7,863	0	696	1,307	15,252
2118	4,512	5,242	0	464	1,307	11,525
2119	2,765	0	0	0	1,307	4,072
2120	5,393	7,863	0	696	1,311	15,263
2121	4,512	5,242	0	464	1,307	11,525
2122	2,765	0	0	0	1,307	4,072
2123	4,512	5,242	0	464	1,307	11,525
2124	5,393	7,863	0	696	1,311	15,263
2125	2,765	0	0	0	1,307	4,072
2126	4,512	5,242	0	464	1,307	11,525
2127	5,386	7,863	0	696	1,307	15,252
2128	2,773	0	0	0	1,311	4,083
2129	4,512	5,242	0	464	1,307	11,525
2130	4,512	5,242	0	464	1,307	11,525
2131	2,765	0	0	0	1,307	4,072

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Decommissioning Cost Analysis***

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TABLE 3.7 (continued)
SCENARIO 4
PRAIRIE ISLAND NUCLEAR GENERATING PLANT, UNIT 1
SCHEDULE OF TOTAL ANNUAL EXPENDITURES
(thousands, 2014 dollars)

Year	Labor	Equipment & Materials	Energy	Burial	Other	Total
2132	3,646	2,621	0	232	1,311	7,810
2133	2,765	0	0	0	1,307	4,072
2134	2,765	0	0	0	1,307	4,072
2135	4,512	5,242	0	464	1,307	11,525
2136	8,014	15,725	0	1,392	1,311	26,442
2137	2,765	0	0	0	1,307	4,072
2138	6,259	10,483	0	928	1,307	18,978
2139	2,765	0	0	0	1,307	4,072
2140	4,520	5,242	0	464	1,311	11,536
2141	2,765	0	0	0	1,307	4,072
2142	6,259	10,483	0	928	1,307	18,978
2143	2,765	0	0	0	1,307	4,072
2144	6,267	10,483	0	928	1,311	18,989
2145	2,765	0	0	0	1,307	4,072
2146	6,259	10,483	0	928	1,307	18,978
2147	2,765	0	0	0	1,307	4,072
2148	6,267	10,483	0	928	1,311	18,989
2149	2,765	0	0	0	1,307	4,072
2150	8,007	15,725	0	1,247	1,307	26,286
2151	2,765	0	0	0	1,307	4,072
2152	6,485	11,139	0	986	1,311	19,921
2153	6,478	11,139	0	986	1,307	19,910
2154	6,478	11,139	0	986	1,307	19,910
2155	6,785	12,059	0	986	1,307	21,137
2156	5,393	7,863	0	696	1,311	15,263
2157	4,512	5,242	0	464	1,307	11,525
2158	4,512	5,242	0	464	1,307	11,525
2159	2,765	0	0	0	1,307	4,072
2160	5,393	7,863	0	696	1,311	15,263
2161	4,512	5,242	0	464	1,307	11,525
2162	5,386	7,863	0	696	1,307	15,252
2163	5,386	7,863	0	696	1,307	15,252
2164	2,773	0	0	0	1,311	4,083

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Decommissioning Cost Analysis***

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TABLE 3.7 (continued)
SCENARIO 4
PRAIRIE ISLAND NUCLEAR GENERATING PLANT, UNIT 1
SCHEDULE OF TOTAL ANNUAL EXPENDITURES
(thousands, 2014 dollars)

Year	Labor	Equipment & Materials	Energy	Burial	Other	Total
2165	4,512	5,242	0	464	1,307	11,525
2166	2,765	0	0	0	1,307	4,072
2167	5,386	7,863	0	696	1,307	15,252
2168	4,520	5,242	0	464	1,311	11,536
2169	2,765	0	0	0	1,307	4,072
2170	5,386	7,863	0	696	1,307	15,252
2171	4,512	5,242	0	464	1,307	11,525
2172	2,773	0	0	0	1,311	4,083
2173	4,512	5,242	0	464	1,307	11,525
2174	5,386	7,863	0	696	1,307	15,252
2175	2,765	0	0	0	1,307	4,072
2176	4,520	5,242	0	464	1,311	11,536
2177	5,386	7,863	0	696	1,307	15,252
2178	2,765	0	0	0	1,307	4,072
2179	4,512	5,242	0	464	1,307	11,525
2180	4,520	5,242	0	464	1,311	11,536
2181	2,765	0	0	0	1,307	4,072
2182	3,639	2,621	0	232	1,307	7,799
2183	2,765	0	0	0	1,307	4,072
2184	2,773	0	0	0	1,311	4,083
2185	4,512	5,242	0	464	1,307	11,525
2186	8,007	15,725	0	1,392	1,307	26,431
2187	2,765	0	0	0	1,307	4,072
2188	6,267	10,483	0	928	1,311	18,989
2189	2,765	0	0	0	1,307	4,072
2190	4,512	5,242	0	464	1,307	11,525
2191	2,355	252	0	0	1,262	3,869
2192	5,939	10,988	0	928	1,266	19,121
2193	2,439	505	0	0	1,262	4,205
2194	5,975	11,114	0	928	1,262	19,279
2195	2,704	1,299	0	0	1,262	5,265
2196	6,023	11,240	0	928	1,266	19,457
2197	2,397	378	0	0	1,262	4,037

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TABLE 3.7 (continued)
SCENARIO 4
PRAIRIE ISLAND NUCLEAR GENERATING PLANT, UNIT 1
SCHEDULE OF TOTAL ANNUAL EXPENDITURES
(thousands, 2014 dollars)

Year	Labor	Equipment & Materials	Energy	Burial	Other	Total
2198	5,849	10,736	0	928	1,262	18,775
2199	2,439	505	0	0	1,262	4,205
2200	7,638	16,104	0	1,247	1,262	26,251
2201	2,439	505	0	0	1,262	4,205
2202	2,439	505	0	0	1,262	4,205
2203	2,439	505	0	0	1,262	4,205
2204	2,403	378	0	0	1,266	4,047
2205	2,439	505	0	0	1,262	4,205
2206	2,439	505	0	0	1,262	4,205
2207	2,397	378	0	0	1,262	4,037
2208	2,445	505	0	0	1,266	4,215
2209	2,439	505	0	0	1,262	4,205
2210	2,397	378	0	0	1,262	4,037
2211	2,439	505	0	0	1,262	4,205
2212	2,445	505	0	0	1,266	4,215
2213	2,397	378	0	0	1,262	4,037
2214	2,439	505	0	0	1,262	4,205
2215	2,439	505	0	0	1,262	4,205
2216	2,403	378	0	0	1,266	4,047
2217	2,397	1,841	0	0	10,850	15,087
2218	878	363	59	23	1,292	2,615
Total	1,006,900	970,689	25,868	130,453	327,850	2,461,760

Note: Columns may not add due to rounding

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**TABLE 3.8
SCENARIO 4
PRAIRIE ISLAND NUCLEAR GENERATING PLANT, UNIT 2
SCHEDULE OF TOTAL ANNUAL EXPENDITURES
(thousands, 2014 dollars)**

Year	Labor	Equipment & Materials	Energy	Burial	Other	Total
2034	7,299	2,614	623	10	2,517	13,064
2035	43,382	16,222	4,178	2,254	12,987	79,023
2036	55,974	34,671	4,613	18,358	8,813	122,430
2037	56,757	28,273	3,061	20,955	9,030	118,076
2038	55,366	12,931	2,666	20,781	7,958	99,703
2039	15,550	5,791	850	1,518	4,212	27,921
2040	10,863	255	713	41	3,935	15,806
2041	14,159	10,233	711	41	3,925	29,068
2042	10,833	254	711	41	3,925	15,763
2043	14,159	10,233	711	41	3,925	29,068
2044	10,863	255	713	41	3,935	15,806
2045	14,159	10,233	711	41	3,925	29,068
2046	10,833	254	711	41	3,925	15,763
2047	14,159	10,233	711	41	3,925	29,068
2048	10,863	255	713	41	3,935	15,806
2049	19,034	16,816	836	884	4,178	41,747
2050	28,315	7,198	1,141	2,953	4,005	43,612
2051	21,648	11,554	481	16	1,531	35,229
2052	18,754	15,775	356	0	1,328	36,213
2053	12,239	13,303	167	986	1,315	28,010
2054	6,478	11,139	0	986	1,307	19,910
2055	6,478	11,139	0	986	1,307	19,910
2056	5,393	7,863	0	696	1,311	15,263
2057	4,512	5,242	0	464	1,307	11,525
2058	4,512	5,242	0	464	1,307	11,525
2059	2,765	0	0	0	1,307	4,072
2060	5,393	7,863	0	696	1,311	15,263
2061	4,512	5,242	0	464	1,307	11,525
2062	5,386	7,863	0	696	1,307	15,252
2063	5,386	7,863	0	696	1,307	15,252
2064	2,773	0	0	0	1,311	4,083
2065	4,512	5,242	0	464	1,307	11,525

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Decommissioning Cost Analysis***

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TABLE 3.8 (continued)
SCENARIO 4
PRAIRIE ISLAND NUCLEAR GENERATING PLANT, UNIT 2
SCHEDULE OF TOTAL ANNUAL EXPENDITURES
(thousands, 2014 dollars)

Year	Labor	Equipment & Materials	Energy	Burial	Other	Total
2066	2,765	0	0	0	1,307	4,072
2067	5,386	7,863	0	696	1,307	15,252
2068	4,520	5,242	0	464	1,311	11,536
2069	2,765	0	0	0	1,307	4,072
2070	5,386	7,863	0	696	1,307	15,252
2071	4,512	5,242	0	464	1,307	11,525
2072	2,773	0	0	0	1,311	4,083
2073	4,512	5,242	0	464	1,307	11,525
2074	5,386	7,863	0	696	1,307	15,252
2075	3,072	921	0	0	1,307	5,300
2076	4,520	5,242	0	464	1,311	11,536
2077	5,386	7,863	0	696	1,307	15,252
2078	2,765	0	0	0	1,307	4,072
2079	4,512	5,242	0	464	1,307	11,525
2080	4,520	5,242	0	464	1,311	11,536
2081	2,765	0	0	0	1,307	4,072
2082	3,639	2,621	0	232	1,307	7,799
2083	2,765	0	0	0	1,307	4,072
2084	2,773	0	0	0	1,311	4,083
2085	4,512	5,242	0	464	1,307	11,525
2086	8,007	15,725	0	1,392	1,307	26,431
2087	2,765	0	0	0	1,307	4,072
2088	6,267	10,483	0	928	1,311	18,989
2089	2,765	0	0	0	1,307	4,072
2090	4,512	5,242	0	464	1,307	11,525
2091	2,765	0	0	0	1,307	4,072
2092	6,267	10,483	0	928	1,311	18,989
2093	2,765	0	0	0	1,307	4,072
2094	6,259	10,483	0	928	1,307	18,978
2095	2,765	0	0	0	1,307	4,072
2096	6,267	10,483	0	928	1,311	18,989
2097	2,765	0	0	0	1,307	4,072
2098	6,259	10,483	0	928	1,307	18,978

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TABLE 3.8 (continued)
SCENARIO 4
PRAIRIE ISLAND NUCLEAR GENERATING PLANT, UNIT 2
SCHEDULE OF TOTAL ANNUAL EXPENDITURES
(thousands, 2014 dollars)

Year	Labor	Equipment & Materials	Energy	Burial	Other	Total
2099	2,765	0	0	0	1,307	4,072
2100	8,007	15,725	0	1,247	1,307	26,286
2101	2,765	0	0	0	1,307	4,072
2102	6,478	11,139	0	986	1,307	19,910
2103	6,478	11,139	0	986	1,307	19,910
2104	6,485	11,139	0	986	1,311	19,921
2105	6,478	11,139	0	986	1,307	19,910
2106	5,386	7,863	0	696	1,307	15,252
2107	4,512	5,242	0	464	1,307	11,525
2108	4,520	5,242	0	464	1,311	11,536
2109	2,765	0	0	0	1,307	4,072
2110	5,386	7,863	0	696	1,307	15,252
2111	4,512	5,242	0	464	1,307	11,525
2112	5,393	7,863	0	696	1,311	15,263
2113	5,386	7,863	0	696	1,307	15,252
2114	2,765	0	0	0	1,307	4,072
2115	4,819	6,162	0	464	1,307	12,753
2116	2,773	0	0	0	1,311	4,083
2117	5,386	7,863	0	696	1,307	15,252
2118	4,512	5,242	0	464	1,307	11,525
2119	2,765	0	0	0	1,307	4,072
2120	5,393	7,863	0	696	1,311	15,263
2121	4,512	5,242	0	464	1,307	11,525
2122	2,765	0	0	0	1,307	4,072
2123	4,512	5,242	0	464	1,307	11,525
2124	5,393	7,863	0	696	1,311	15,263
2125	2,765	0	0	0	1,307	4,072
2126	4,512	5,242	0	464	1,307	11,525
2127	5,386	7,863	0	696	1,307	15,252
2128	2,773	0	0	0	1,311	4,083
2129	4,512	5,242	0	464	1,307	11,525
2130	4,512	5,242	0	464	1,307	11,525
2131	2,765	0	0	0	1,307	4,072

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TABLE 3.8 (continued)
SCENARIO 4
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SCHEDULE OF TOTAL ANNUAL EXPENDITURES
(thousands, 2014 dollars)

Year	Labor	Equipment & Materials	Energy	Burial	Other	Total
2132	3,646	2,621	0	232	1,311	7,810
2133	2,765	0	0	0	1,307	4,072
2134	2,765	0	0	0	1,307	4,072
2135	4,512	5,242	0	464	1,307	11,525
2136	8,014	15,725	0	1,392	1,311	26,442
2137	2,765	0	0	0	1,307	4,072
2138	6,259	10,483	0	928	1,307	18,978
2139	2,765	0	0	0	1,307	4,072
2140	4,520	5,242	0	464	1,311	11,536
2141	2,765	0	0	0	1,307	4,072
2142	6,259	10,483	0	928	1,307	18,978
2143	2,765	0	0	0	1,307	4,072
2144	6,267	10,483	0	928	1,311	18,989
2145	2,765	0	0	0	1,307	4,072
2146	6,259	10,483	0	928	1,307	18,978
2147	2,765	0	0	0	1,307	4,072
2148	6,267	10,483	0	928	1,311	18,989
2149	2,765	0	0	0	1,307	4,072
2150	8,007	15,725	0	1,247	1,307	26,286
2151	2,765	0	0	0	1,307	4,072
2152	6,485	11,139	0	986	1,311	19,921
2153	6,478	11,139	0	986	1,307	19,910
2154	6,478	11,139	0	986	1,307	19,910
2155	6,785	12,059	0	986	1,307	21,137
2156	5,393	7,863	0	696	1,311	15,263
2157	4,512	5,242	0	464	1,307	11,525
2158	4,512	5,242	0	464	1,307	11,525
2159	2,765	0	0	0	1,307	4,072
2160	5,393	7,863	0	696	1,311	15,263
2161	4,512	5,242	0	464	1,307	11,525
2162	5,386	7,863	0	696	1,307	15,252
2163	5,386	7,863	0	696	1,307	15,252
2164	2,773	0	0	0	1,311	4,083

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SCENARIO 4
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SCHEDULE OF TOTAL ANNUAL EXPENDITURES
(thousands, 2014 dollars)

Year	Labor	Equipment & Materials	Energy	Burial	Other	Total
2165	4,512	5,242	0	464	1,307	11,525
2166	2,765	0	0	0	1,307	4,072
2167	5,386	7,863	0	696	1,307	15,252
2168	4,520	5,242	0	464	1,311	11,536
2169	2,765	0	0	0	1,307	4,072
2170	5,386	7,863	0	696	1,307	15,252
2171	4,512	5,242	0	464	1,307	11,525
2172	2,773	0	0	0	1,311	4,083
2173	4,512	5,242	0	464	1,307	11,525
2174	5,386	7,863	0	696	1,307	15,252
2175	2,765	0	0	0	1,307	4,072
2176	4,520	5,242	0	464	1,311	11,536
2177	5,386	7,863	0	696	1,307	15,252
2178	2,765	0	0	0	1,307	4,072
2179	4,512	5,242	0	464	1,307	11,525
2180	4,520	5,242	0	464	1,311	11,536
2181	2,765	0	0	0	1,307	4,072
2182	3,639	2,621	0	232	1,307	7,799
2183	2,765	0	0	0	1,307	4,072
2184	2,773	0	0	0	1,311	4,083
2185	4,512	5,242	0	464	1,307	11,525
2186	8,007	15,725	0	1,392	1,307	26,431
2187	2,765	0	0	0	1,307	4,072
2188	6,267	10,483	0	928	1,311	18,989
2189	2,765	0	0	0	1,307	4,072
2190	4,512	5,242	0	464	1,307	11,525
2191	2,355	252	0	0	1,262	3,869
2192	5,939	10,988	0	928	1,266	19,121
2193	2,439	505	0	0	1,262	4,205
2194	5,975	11,114	0	928	1,262	19,279
2195	2,704	1,299	0	0	1,262	5,265
2196	6,023	11,240	0	928	1,266	19,457
2197	2,397	378	0	0	1,262	4,037

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TABLE 3.8 (continued)
SCENARIO 4
PRAIRIE ISLAND NUCLEAR GENERATING PLANT, UNIT 2
SCHEDULE OF TOTAL ANNUAL EXPENDITURES
(thousands, 2014 dollars)

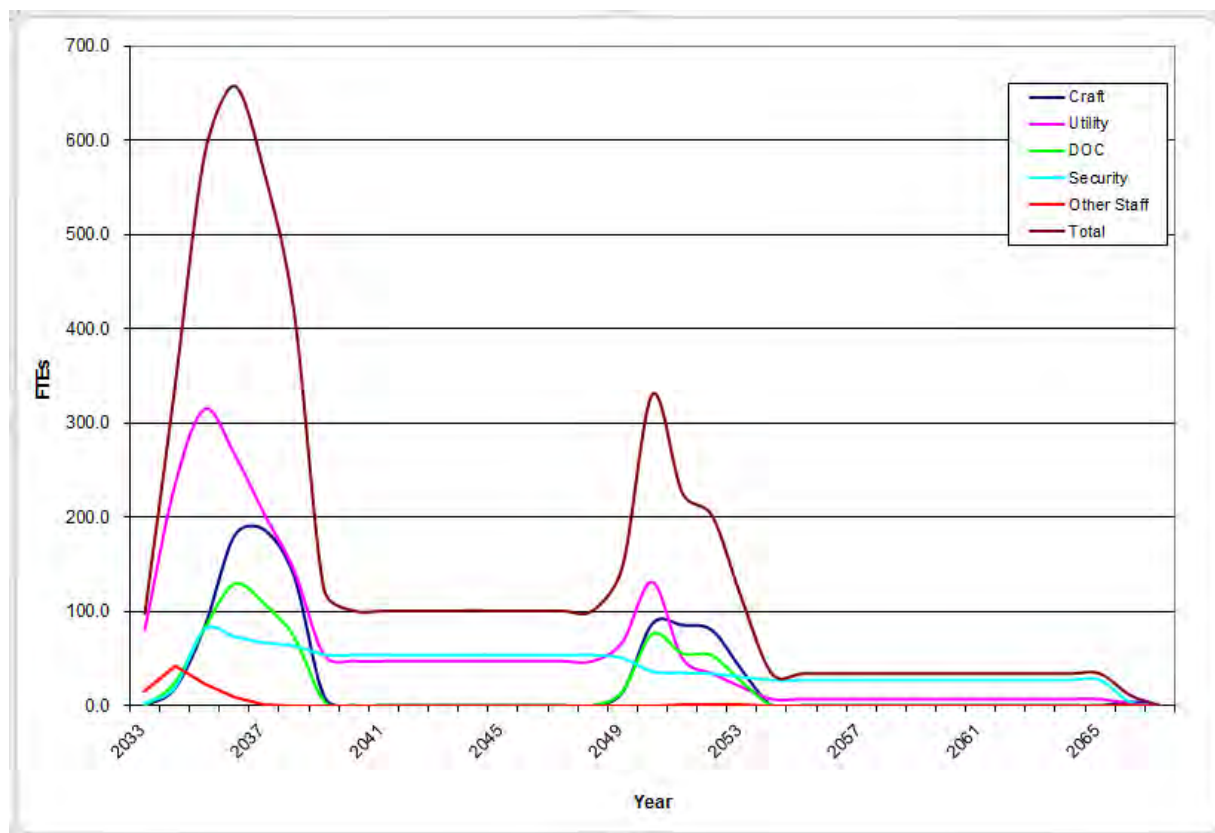
Year	Labor	Equipment & Materials	Energy	Burial	Other	Total
2198	5,849	10,736	0	928	1,262	18,775
2199	2,439	505	0	0	1,262	4,205
2200	7,638	16,104	0	1,247	1,262	26,251
2201	2,439	505	0	0	1,262	4,205
2202	2,439	505	0	0	1,262	4,205
2203	2,439	505	0	0	1,262	4,205
2204	2,403	378	0	0	1,266	4,047
2205	2,439	505	0	0	1,262	4,205
2206	2,439	505	0	0	1,262	4,205
2207	2,397	378	0	0	1,262	4,037
2208	2,445	505	0	0	1,266	4,215
2209	2,439	505	0	0	1,262	4,205
2210	2,397	378	0	0	1,262	4,037
2211	2,439	505	0	0	1,262	4,205
2212	2,445	505	0	0	1,266	4,215
2213	2,397	378	0	0	1,262	4,037
2214	2,439	505	0	0	1,262	4,205
2215	2,439	505	0	0	1,262	4,205
2216	2,403	378	0	0	1,266	4,047
2217	2,397	1,475	0	0	9,864	13,736
2218	878	242	0	23	1,292	2,435
Total	1,141,250	972,994	25,377	134,897	316,426	2,590,943

Note: Columns may not add due to rounding

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**FIGURE 3.1
SCENARIO 1
PRAIRIE ISLAND NUCLEAR GENERATING PLANT
MANPOWER LEVELS**



4. SCHEDULE ESTIMATE

The schedule for the decommissioning scenario considered in this study follows the sequence presented in the AIF/NESP-036 study, with minor changes to reflect recent experience and site-specific constraints. In addition, the scheduling has been revised to reflect the spent fuel management plan described in Section 3.5.1.

A schedule or sequence of activities for the DECON alternative (without the post-decommissioning ISFSI operating period) is presented in Figure 4.1. The scheduling sequence assumes that fuel is removed from the spent fuel pool approximately fifteen years following the permanent cessation of plant operations. The key activities listed in the schedule do not reflect a one-to-one correspondence with those activities in the cost table, but reflect dividing some activities for clarity and combining others for convenience. The schedule was prepared using the "Microsoft Project Professional 2010" computer software.^[37]

4.1 SCHEDULE ESTIMATE ASSUMPTIONS

The schedule reflects the results of a precedence network developed for the site decommissioning activities, i.e., a PERT (Program Evaluation and Review Technique) Software Package. The work activity durations used in the precedence network reflect the actual man-hour estimates from the cost table, adjusted by stretching certain activities over their slack range and shifting the start and end dates of others. The following assumptions were made in the development of the decommissioning schedule:

- The fuel handling area of the auxiliary building is isolated until such time that all spent fuel has been discharged from the spent fuel pool to the ISFSI. Decontamination and dismantling of the storage pool is initiated once the transfer of spent fuel is complete.
- All work (except vessel and internals removal) is performed during an 8-hour workday, 5 days per week, with no overtime. There are eleven paid holidays per year.
- Reactor and internals removal activities are performed by using separate crews for different activities working on different shifts, with a corresponding backshift charge for the second shift.
- Multiple crews work parallel activities to the maximum extent possible, consistent with optimum efficiency, adequate access for cutting, removal and laydown space, and with the stringent safety measures necessary during demolition of heavy components and structures.

- For plant systems removal, the systems with the longest removal durations in areas on the critical path are considered to determine the duration of the activity.

4.2 PROJECT SCHEDULE

The period-dependent costs presented in Appendices C through F are based upon the durations developed in the schedules for decommissioning. Durations are established between several milestones in each project period; these durations are used to establish a critical path for the entire project. In turn, the critical path duration for each period is used as the basis for determining the period-dependent costs. A second critical path is shown for the spent fuel storage period, which determines the release of the auxiliary building for final decontamination.

Project timelines are provided in Figures 4.2 through 4.4, with milestone dates based on the anticipated shutdown dates. The fuel pool is emptied approximately fifteen years after Unit 2 shutdown, while ISFSI operations continue until all spent fuel has been transferred to an appropriate disposal facility.

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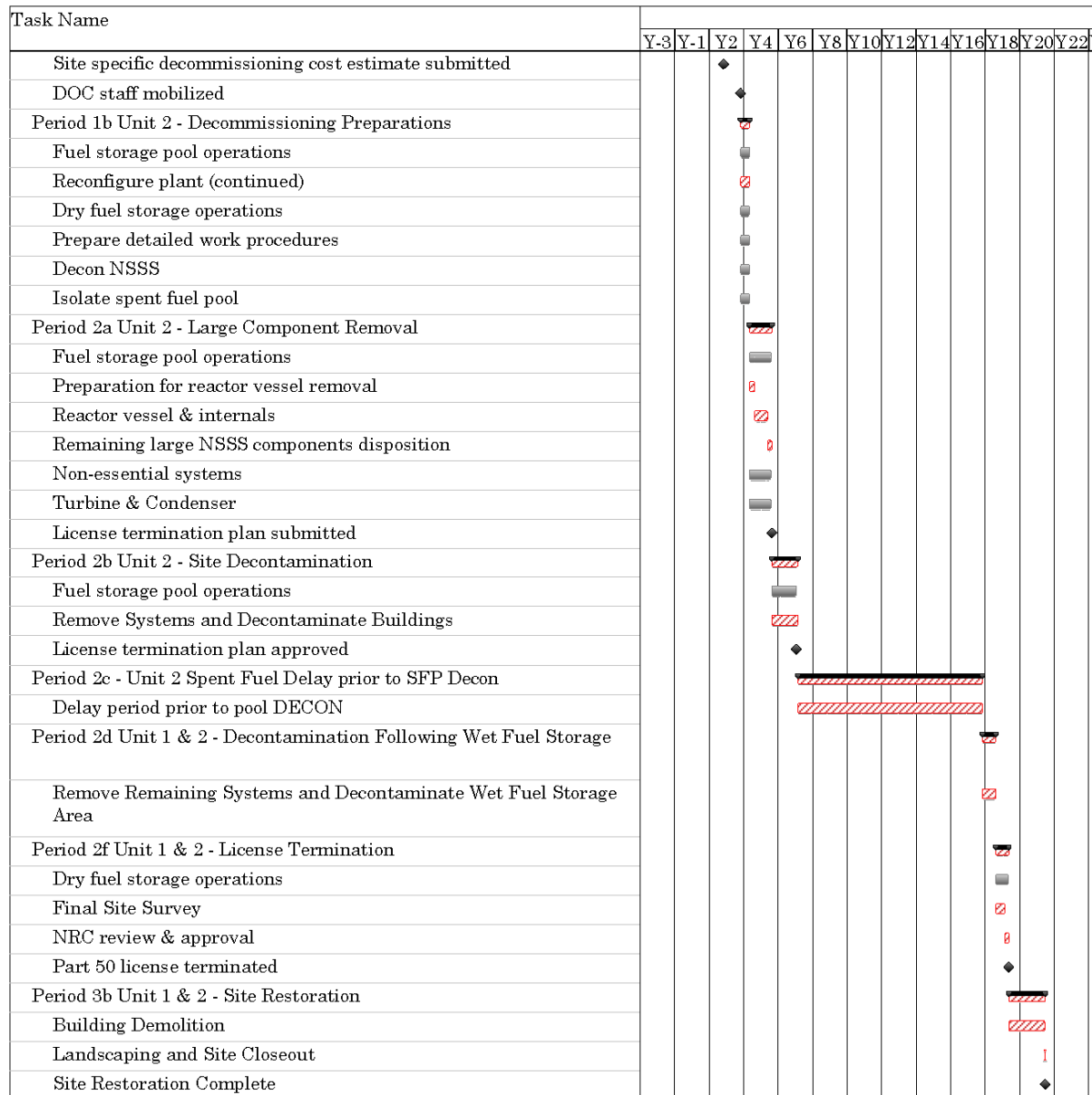
**FIGURE 4.1
ACTIVITY SCHEDULE**



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**FIGURE 4.1
ACTIVITY SCHEDULE
(continued)**



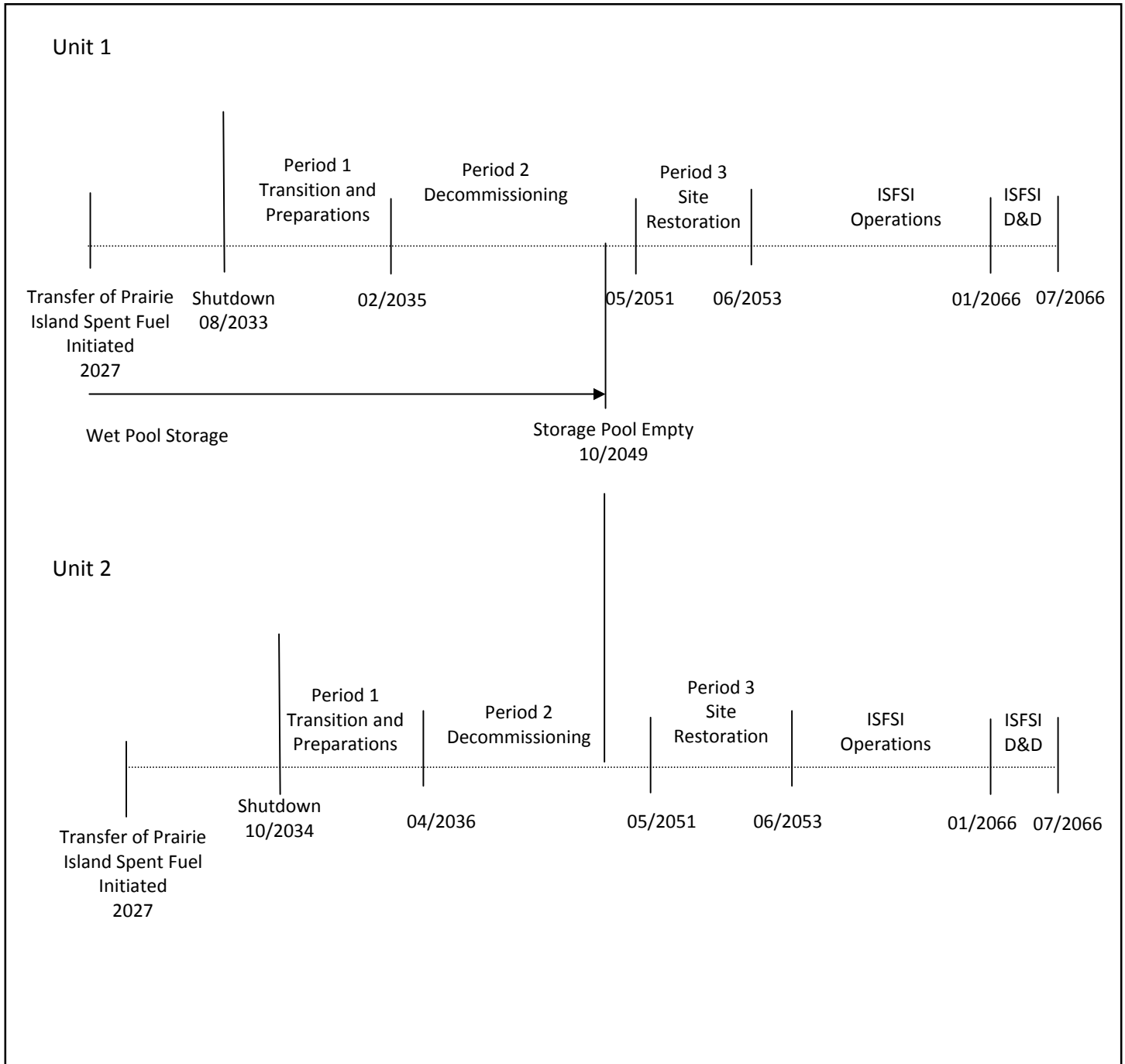
LEGEND

1. Red scheduling bars indicate critical path activities
2. Blue scheduling bars associated with major decommissioning periods, e.g., Period 1a, indicate overall duration of that period
3. Diamond symbols indicate major milestones
4. In the chart header, the "Y1", "Y4", et. al. refers to the years of the decommissioning project. Therefore, "Y1" is the year of shutdown for Unit 1, or 2033.

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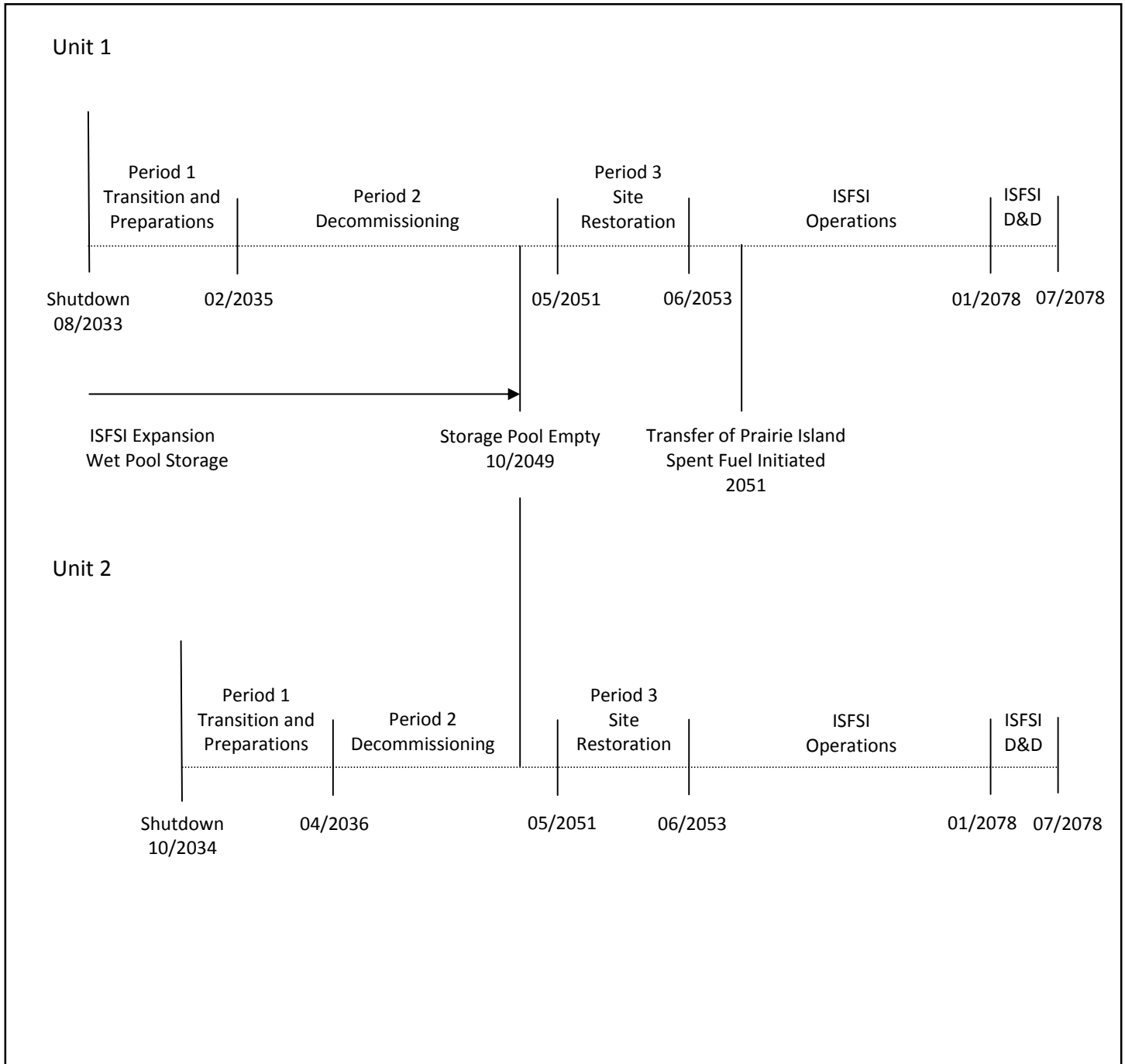
**FIGURE 4.2
SCENARIO 1 DECOMMISSIONING TIMELINES
(not to scale)**



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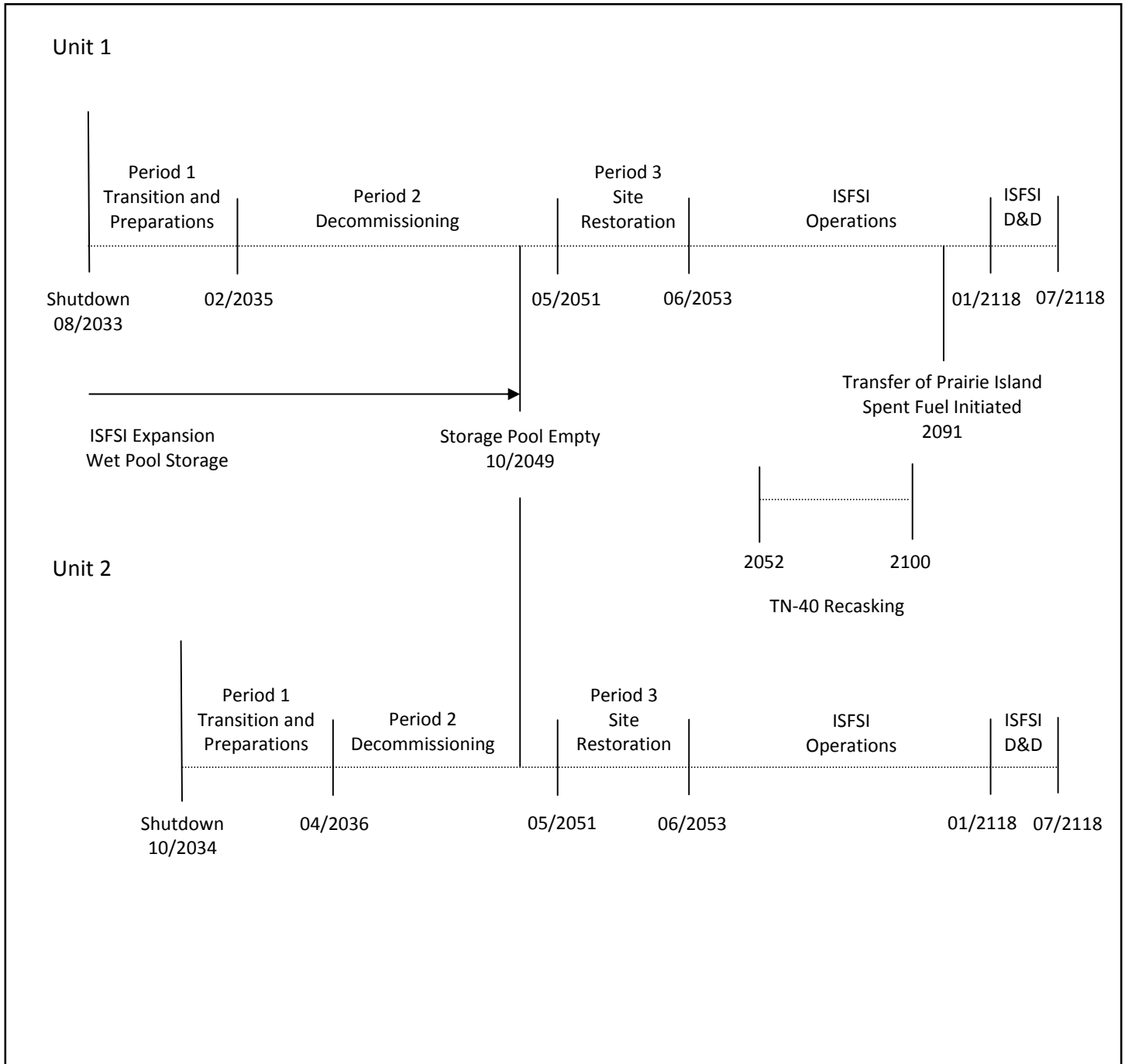
**FIGURE 4.3
SCENARIO 2 DECOMMISSIONING TIMELINES
(not to scale)**



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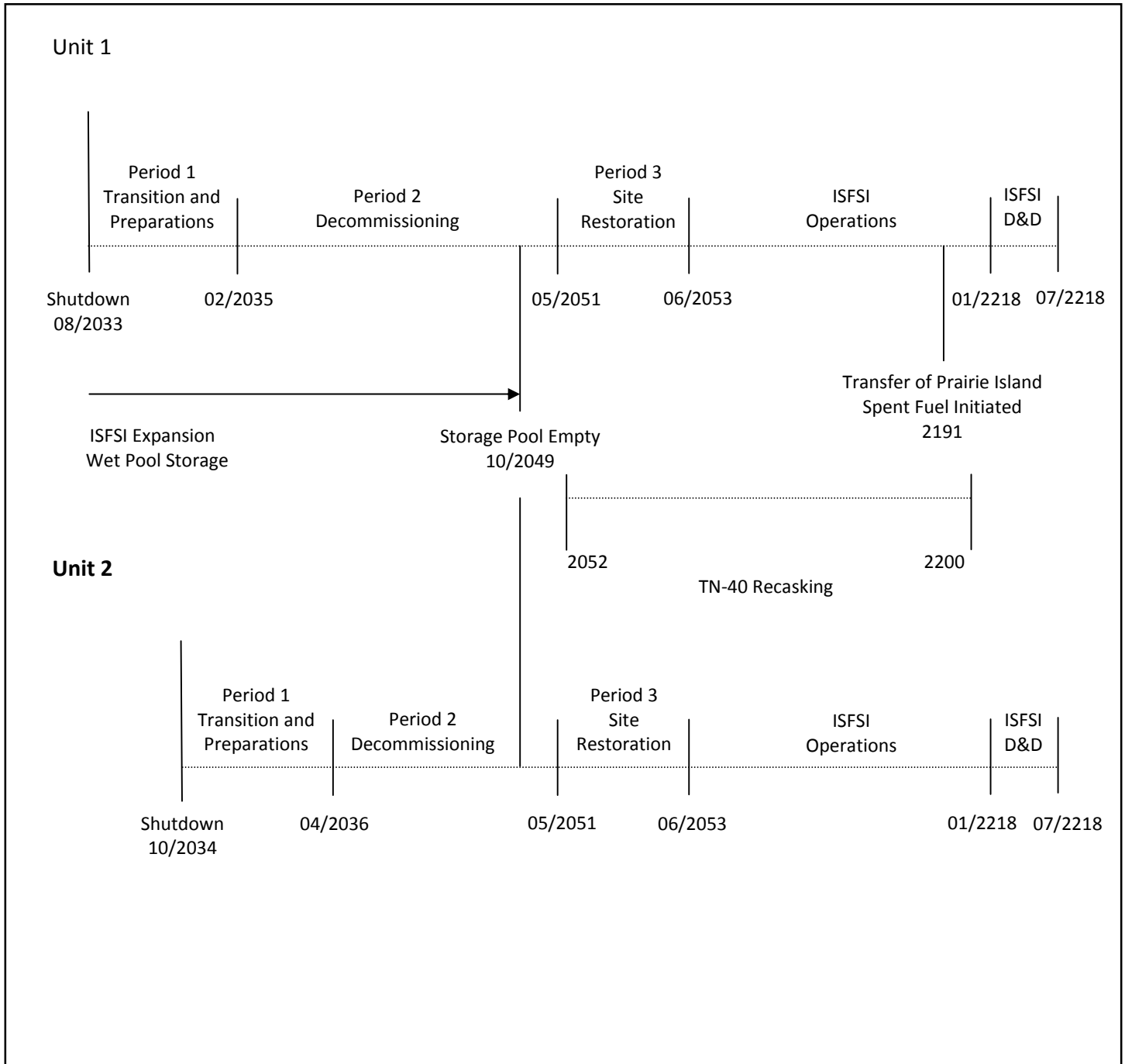
**FIGURE 4.4
SCENARIO 3 DECOMMISSIONING TIMELINES
(not to scale)**



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**FIGURE 4.5
SCENARIO 4 DECOMMISSIONING TIMELINES
(not to scale)**



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5. RADIOACTIVE WASTES

The objectives of the decommissioning process are the removal of all radioactive material from the site that would restrict its future use and the termination of the NRC license. This currently requires the remediation of all radioactive material at the site in excess of applicable legal limits. Under the Atomic Energy Act,^[38] the NRC is responsible for protecting the public from sources of ionizing radiation. Title 10 of the Code of Federal Regulations delineates the production, utilization, and disposal of radioactive materials and processes. In particular, Part 71 defines radioactive material as it pertains to transportation and Part 61 specifies its disposition.

Most of the materials being transported for controlled burial are categorized as Low Specific Activity (LSA) or Surface Contaminated Object (SCO) materials containing Type A quantities, as defined in 49 CFR Parts 173-178. Shipping containers are required to be Industrial Packages (IP-1, IP-2 or IP-3, as defined in 10 CFR §173.411). For this study, commercially available steel containers are presumed to be used for the disposal of piping, small components, and concrete. Larger components can serve as their own containers, with proper closure of all openings, access ways, and penetrations.

The destinations for the various waste streams from decommissioning are identified in Figures 5.1 and 5.2. The volumes of radioactive waste generated during the various decommissioning activities are shown on a line-item basis in Appendices C through F, and summarized in Tables 5.1, 5.2 and 5.3. The quantified waste volume summaries shown in these tables are consistent with Part 61 classifications. The volumes are calculated based on the exterior dimensions for containerized material and on the displaced volume of components serving as their own waste containers.

The reactor vessel and internals are categorized as large quantity shipments and, accordingly, will be shipped in reusable, shielded truck casks with disposable liners. In calculating disposal costs, the burial fees are applied against the liner volume, as well as the special handling requirements of the payload. Packaging efficiencies are lower for the highly activated materials (greater than Type A quantity waste), where high concentrations of gamma-emitting radionuclides limit the capacity of the shipping canisters.

No process system containing/handling radioactive substances at shutdown is presumed to meet material release criteria by decay alone (i.e., systems radioactive at shutdown will still be radioactive over the time period during which the decommissioning is accomplished, due to the presence of long-lived radionuclides).

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While the dose rates decrease with time, radionuclides such as ^{137}Cs will still control the disposition requirements.

The waste material produced in the decontamination and dismantling of the nuclear units is primarily generated during Period 2. Material that is considered potentially contaminated when removed from the radiological controlled area is sent to processing facilities in Tennessee for conditioning and disposal. Heavily contaminated components and activated materials are routed for controlled disposal. The disposal volumes reported in the tables reflect the savings resulting from reprocessing and recycling.

For purposes of constructing the estimates, the cost for disposal at the EnergySolutions facility was used. Separate rates were used for containerized waste and large components, including the steam generators and reactor coolant pump motors. Demolition debris including miscellaneous steel, scaffolding, and concrete was disposed of at a bulk rate. The decommissioning waste stream also included resins and dry active waste.

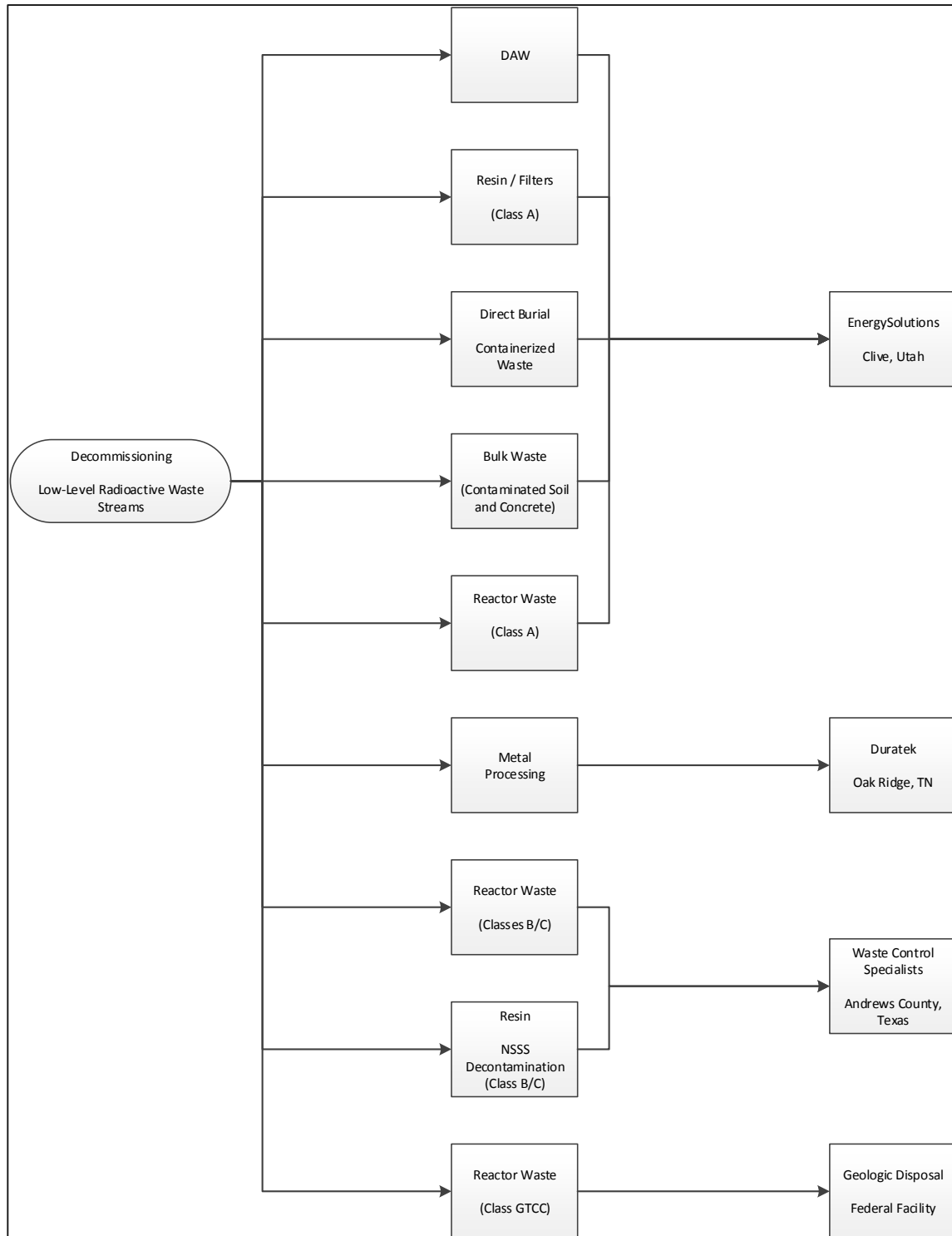
The recently completed facility in Andrews County was declared operational by the operator, Waste Control Specialists (WCS), in November 2011. The facility will be able to accept limited quantities of non-Compact waste; however, at this time the cost for non-Compact generators is being negotiated on an individual basis. The Texas facility is licensed to receive the higher activity waste forms (Classes B and C). As such, for this analysis, disposal costs for the Class B and C waste were based upon the preliminary and indicative information on the cost for such from WCS.

A small quantity of material will be generated during the Prairie Island decommissioning that is not considered suitable for near-surface disposal, and is assumed to be disposed of in a geologic repository, in a manner similar to that envisioned for spent fuel disposal. This material, known as Greater-Than-Class-C or GTCC material, is estimated to require seven spent fuel storage canisters (or the equivalent) to dispose of the most radioactive portions of the two reactor vessel internals. The volume and weight reported in Tables 5.1, 5.2 and 5.3 represent the packaged weight and volume of the spent fuel storage canisters.

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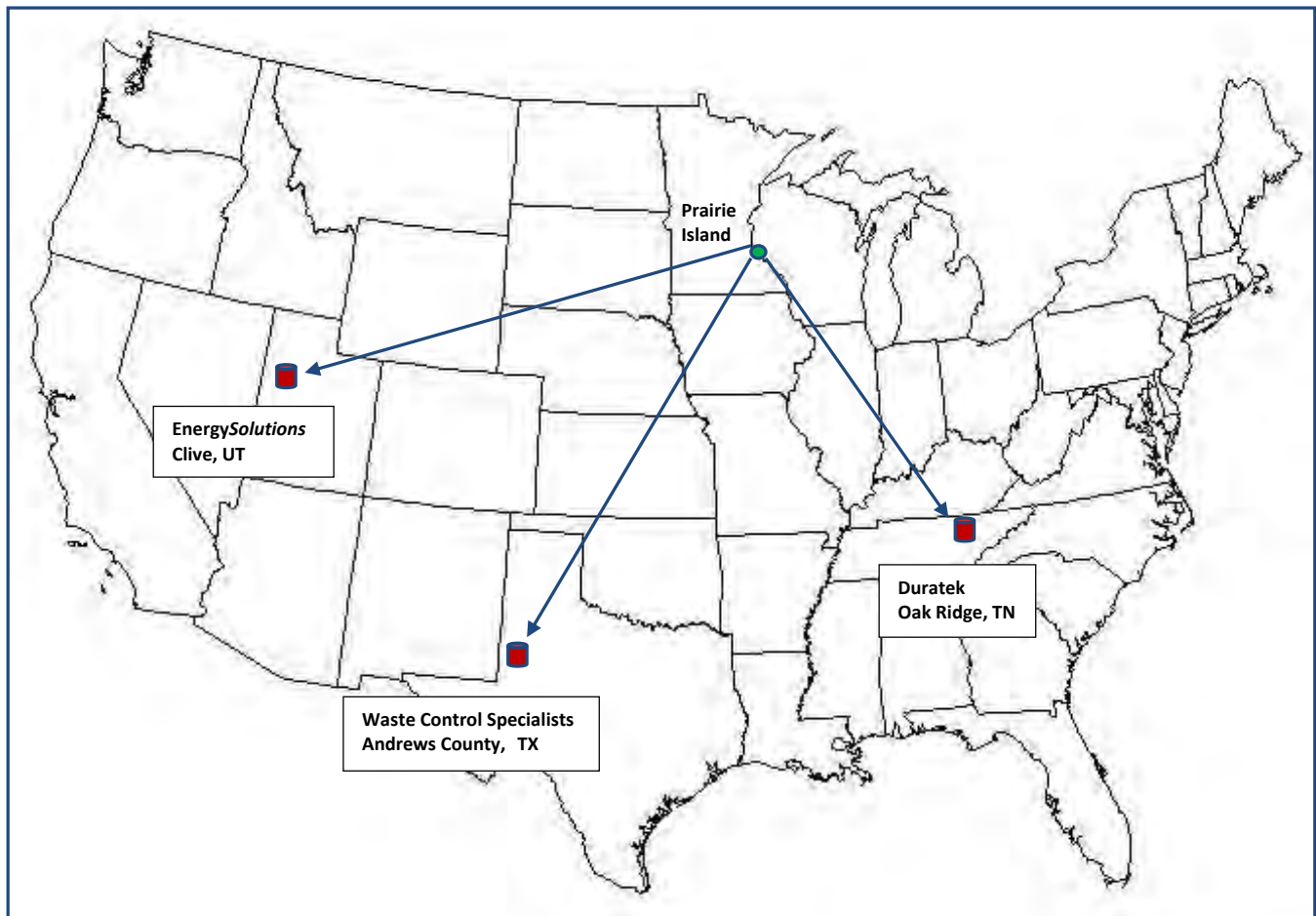
**FIGURE 5.1
RADIOACTIVE WASTE DISPOSITION**



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**FIGURE 5.2
DECOMMISSIONING WASTE DESTINATIONS
RADIOLOGICAL**



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**TABLE 5.1
SCENARIOS 1 AND 2
DECOMMISSIONING WASTE SUMMARY**

Waste	Cost Basis	Class ^[1]	Waste Volume (cubic feet)	Weight (pounds)
Low-Level Radioactive Waste (near-surface disposal)	EnergySolutions Containerized	A	176,750	11,581,672
	EnergySolutions Bulk	A	101,200	4,802,940
	WCS	B	1,427	146,078
	WCS	C	1,290	191,044
Greater than Class C (geologic repository)	Spent Fuel Equivalent	GTCC	6,556	1,480,958
Total ^[2]			287,223	18,202,692
Processed/Conditioned (off-site recycling center)	Recycling Vendors	A	314,393	12,585,953
Scrap Metal				125,372,000

^[1] Waste is classified according to the requirements as delineated in Title 10 CFR, Part 61.55

^[2] Columns may not add due to rounding.

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**TABLE 5.2
SCENARIO 3
DECOMMISSIONING WASTE SUMMARY**

Waste	Cost Basis	Class ^[1]	Waste Volume (cubic feet)	Weight (pounds)
Low-Level Radioactive Waste (near-surface disposal)	EnergySolutions Containerized	A	293,613	30,103,670
	EnergySolutions Bulk	A	101,200	4,802,940
	WCS	B	1,427	146,078
	WCS	C	1,290	191,044
Greater than Class C (geologic repository)	Spent Fuel Equivalent	GTCC	6,556	1,480,958
Total ^[2]			404,086	36,724,690
Processed/Conditioned (off-site recycling center)	Recycling Vendors	A	314,393	12,585,953
Scrap Metal				125,372,000

^[1] Waste is classified according to the requirements as delineated in Title 10 CFR, Part 61.55

^[2] Columns may not add due to rounding.

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**TABLE 5.3
SCENARIO 4
DECOMMISSIONING WASTE SUMMARY**

Waste	Cost Basis	Class ^[1]	Waste Volume (cubic feet)	Weight (pounds)
Low-Level Radioactive Waste (near-surface disposal)	EnergySolutions Containerized	A	527,338	67,147,670
	EnergySolutions Bulk	A	101,389	4,819,572
	WCS	B	1,427	146,078
	WCS	C	1,290	191,044
Greater than Class C (geologic repository)	Spent Fuel Equivalent	GTCC	6,556	1,480,958
Total ^[2]			638,000	73,785,322
Processed/Conditioned (off-site recycling center)	Recycling Vendors	A	314,393	12,585,953
Scrap Metal				125,372,000

^[1] Waste is classified according to the requirements as delineated in Title 10 CFR, Part 61.55

^[2] Columns may not add due to rounding.

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6. RESULTS

The analysis to estimate the costs to decommission Prairie Island relied upon the site-specific, technical information provided by Xcel Energy. While not an engineering study, the estimates provide the owner with sufficient information to assess their financial obligations as they pertain to the eventual decommissioning of the nuclear station.

The cost projected to promptly decommission the two Prairie Island nuclear units is estimated to be \$1.599 billion (Scenario 1). The estimates are based on numerous fundamental assumptions, including regulatory requirements, low-level radioactive waste disposal practices, high-level waste management considerations, and project contingencies.

The primary cost contributors, identified in Tables 6.1 through 6.4, are either labor-related or associated with the management and disposition of the radioactive waste. Program management is the largest single contributor to the overall cost. The magnitude of the expense is a function of both the size of the organization required to manage the decommissioning, as well as the duration of the program. It is assumed, for purposes of this analysis, that Xcel Energy will oversee the decommissioning program, using a DOC to manage the decommissioning labor force and the associated subcontractors. The size and composition of the management organization varies with the decommissioning phase and associated site activities. However, once the operating licenses are amended or terminated, the staff is substantially reduced for the conventional demolition and restoration of the site, and the long-term care of the spent fuel.

As described in this report, the spent fuel pool will remain operational for fifteen years following the cessation of operations of Unit 2. The pool will be isolated to allow decommissioning operations to proceed in and around the pool area. Over the fifteen year period, the spent fuel will be packaged into transportable canisters for transfer to the ISFSI.

The cost for waste disposal includes only those costs associated with the controlled disposition of the low-level radioactive waste generated from decontamination and dismantling activities, including plant equipment and components, structural material, filters, resins and dry-active waste. As described in Section 5, disposition of the majority of the low-level radioactive material requiring controlled disposal is at the EnergySolutions facility in Clive, Utah. Highly activated components, requiring additional isolation from the environment, are packaged for geologic disposal. The cost of geologic disposal is based upon a cost equivalent for spent fuel.

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A significant portion of the metallic waste is designated for additional processing and treatment at an off-site facility. Processing reduces the volume of material requiring controlled disposal through such techniques and processes as survey and sorting, decontamination, and volume reduction. The material that cannot be unconditionally released is packaged for controlled disposal at one of the currently operating facilities. The cost identified in the summary tables for processing is all-inclusive, incorporating the ultimate disposition of the material.

Removal costs reflect the labor-intensive nature of the decommissioning process, as well as the management controls required to ensure a safe and successful program. Decontamination and packaging costs also have a large labor component that is based upon prevailing wages. Non-radiological demolition is a natural extension of the decommissioning process. The methods employed in decontamination and dismantling are generally destructive and indiscriminate in inflicting collateral damage. With a work force mobilized to support decommissioning operations, non-radiological demolition can be an integrated activity and a logical expansion of the work being performed in the process of terminating the operating licenses. Prompt demolition reduces future liabilities and can be more cost effective than deferral, due to the deterioration of the facilities (and therefore the working conditions) with time.

The reported cost for transport includes the tariffs and surcharges associated with moving large components and/or overweight shielded casks overland, as well as the general expense (i.e., labor and fuel) of transporting material to the destinations identified in this report. For purposes of this analysis, material is primarily moved overland by truck.

Decontamination is used to reduce the plant's radiation fields and minimize worker exposure. Slightly contaminated material or material located within a contaminated area is sent to an off-site processing center (i.e., this analysis does not assume that contaminated plant components and equipment can be decontaminated for uncontrolled release in-situ). Centralized processing centers have proven to be a more economical means of handling the large volumes of material produced in the dismantling of a nuclear plant.

License termination survey costs are associated with the labor intensive and complex activity of verifying that contamination has been removed from the site to the levels specified by the regulating agency. This process involves a systematic survey of all remaining plant surface areas and surrounding environs, sampling, isotopic analysis, and documentation of the findings. The status of any plant components and materials not removed in the decommissioning process will also require confirmation and will add to the expense of surveying the facilities alone.

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The remaining costs include allocations for heavy equipment and temporary services, as well as for other expenses such as regulatory fees and the premiums for nuclear insurance. While site operating costs are greatly reduced following the final cessation of plant operations, certain administrative functions do need to be maintained either at a basic functional or regulatory level.

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**TABLE 6.1
SCENARIO 1
COST SUMMARY
DECOMMISSIONING COST ELEMENTS**
(thousands of 2014 dollars)

Cost Element	Unit 1	Unit 2	Total	Percentage
Decontamination	10,139	15,991	26,131	1.63
Removal	87,812	111,782	199,595	12.48
Packaging	40,002	32,457	72,459	4.53
Transportation	8,054	8,470	16,523	1.03
Waste Disposal	60,145	61,216	121,361	7.59
Off-site Waste Processing	13,095	15,482	28,577	1.79
Program Management ^[1]	214,518	256,773	471,291	29.47
Railroad Track Maintenance	2,477	2,402	4,880	0.31
Spent Fuel Management (direct costs) ^[2]	162,534	160,315	322,849	20.18
Insurance and Regulatory Fees	22,791	20,148	42,938	2.68
Energy	25,868	25,377	51,245	3.20
Characterization and Licensing Surveys	13,004	15,336	28,340	1.77
Property Taxes	32,499	30,375	62,874	3.93
Miscellaneous Equipment	7,019	7,052	14,071	0.88
Spent Fuel Pool Isolation	12,434	8,290	20,724	1.30
Security	22,755	92,865	115,620	7.23
Total ^[3]	735,147	864,331	1,599,478	100.00

Cost Element	Unit 1	Unit 2	Total	Percentage
License Termination	476,522	552,040	1,028,562	64.31
Spent Fuel Management	212,421	255,739	468,160	29.27
Site Restoration	46,204	56,552	102,756	6.42
Total ^[3]	735,147	864,331	1,599,478	100.00

^[1] Includes engineering and security costs

^[2] Excludes program management costs (staffing) but includes capital expenditures for ISFSI construction, costs for spent fuel loading/transfer costs/spent fuel pool O&M and EP fees

^[3] Columns may not add due to rounding

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**TABLE 6.2
SCENARIO 2
COST SUMMARY
DECOMMISSIONING COST ELEMENTS**
(thousands of 2014 dollars)

Cost Element	Unit 1	Unit 2	Total	Percentage
Decontamination	10,139	15,991	26,131	1.53
Removal	87,812	111,782	199,595	11.71
Packaging	40,002	32,457	72,459	4.25
Transportation	8,054	8,470	16,523	0.97
Waste Disposal	60,145	61,216	121,361	7.12
Off-site Waste Processing	13,095	15,482	28,577	1.68
Program Management ^[1]	227,082	269,337	496,418	29.13
Railroad Track Maintenance	3,214	3,139	6,353	0.37
Spent Fuel Management (direct costs) ^[2]	176,583	174,364	350,947	20.59
Insurance and Regulatory Fees	25,831	23,189	49,020	2.88
Energy	25,868	25,377	51,245	3.01
Characterization and Licensing Surveys	13,004	15,336	28,340	1.66
Property Taxes	39,882	37,758	77,640	4.56
Miscellaneous Equipment	7,019	7,052	14,071	0.83
Spent Fuel Pool Isolation	12,434	8,290	20,724	1.22
Security	37,457	107,566	145,023	8.51
Total ^[3]	787,621	916,805	1,704,427	100.00

Cost Element	Unit 1	Unit 2	Total	Percentage
License Termination	476,522	552,040	1,028,562	60.35
Spent Fuel Management	264,896	308,213	573,109	33.62
Site Restoration	46,204	56,552	102,756	6.03
Total ^[3]	787,621	916,805	1,704,427	100.00

^[1] Includes engineering and security costs

^[2] Excludes program management costs (staffing) but includes capital expenditures for ISFSI construction, costs for spent fuel loading/transfer costs/spent fuel pool O&M and EP fees

^[3] Columns may not add due to rounding

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**TABLE 6.3
SCENARIO 3
COST SUMMARY
DECOMMISSIONING COST ELEMENTS**
(thousands of 2014 dollars)

Cost Element	Unit 1	Unit 2	Total	Percentage
Decontamination	10,139	15,991	26,131	0.94
Removal	87,812	111,782	199,595	7.19
Packaging	40,002	32,457	72,459	2.61
Transportation	10,510	10,926	21,435	0.77
Waste Disposal	82,405	83,476	165,881	5.98
Off-site Waste Processing	13,095	15,482	28,577	1.03
Program Management ^[1]	287,677	329,932	617,608	22.26
Railroad Track Maintenance	5,669	5,594	11,262	0.41
Spent Fuel Management (direct costs) ^[2]	539,948	537,730	1,077,678	38.85
Insurance and Regulatory Fees	35,967	33,324	69,291	2.50
Energy	25,868	25,377	51,245	1.85
Characterization and Licensing Surveys	13,004	15,336	28,340	1.02
Property Taxes	64,492	62,368	126,860	4.57
Miscellaneous Equipment	7,019	7,052	14,071	0.51
Spent Fuel Pool Isolation	12,434	8,290	20,724	0.75
Security	86,459	156,568	243,027	8.76
Total ^[3]	1,322,501	1,451,684	2,774,184	100.00

Cost Element	Unit 1	Unit 2	Total	Percentage
License Termination	476,522	552,040	1,028,561	37.08
Spent Fuel Management	799,880	843,197	1,643,077	59.23
Site Restoration	46,099	56,447	102,546	3.70
Total ^[3]	1,322,501	1,451,684	2,774,184	100.00

^[1] Includes engineering and security costs

^[2] Excludes program management costs (staffing) but includes capital expenditures for ISFSI construction, costs for spent fuel loading/transfer costs/spent fuel pool O&M and EP fees

^[3] Columns may not add due to rounding

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**TABLE 6.4
SCENARIO 4
COST SUMMARY
DECOMMISSIONING COST ELEMENTS**
(thousands of 2014 dollars)

Cost Element	Unit 1	Unit 2	Total	Percentage
Decontamination	10,157	16,009	26,166	0.52
Removal	88,003	111,973	199,976	3.96
Packaging	40,005	32,459	72,464	1.43
Transportation	15,424	15,840	31,263	0.62
Waste Disposal	126,946	128,017	254,962	5.05
Off-site Waste Processing	13,095	15,482	28,577	0.57
Program Management ^[1]	441,849	484,104	925,954	18.33
Railroad Track Maintenance	11,806	11,731	23,537	0.47
Spent Fuel Management (direct costs) ^[2]	1,259,858	1,257,639	2,517,497	49.82
Insurance and Regulatory Fees	61,306	58,664	119,970	2.37
Energy	25,868	25,377	51,245	1.01
Characterization and Licensing Surveys	13,004	15,337	28,341	0.56
Property Taxes	126,017	123,894	249,911	4.95
Miscellaneous Equipment	7,019	7,052	14,071	0.28
Spent Fuel Pool Isolation	12,434	8,290	20,724	0.41
Security	208,968	279,078	488,045	9.66
Total ^[3]	2,461,760	2,590,944	5,052,704	100.00

Cost Element	Unit 1	Unit 2	Total	Percentage
License Termination	476,653	552,172	1,028,826	20.36
Spent Fuel Management	1,938,818	1,982,135	3,920,953	77.60
Site Restoration	46,288	56,636	102,925	2.04
Total ^[3]	2,461,760	2,590,944	5,052,704	100.00

^[1] Includes engineering and security costs

^[2] Excludes program management costs (staffing) but includes capital expenditures for ISFSI construction, costs for spent fuel loading/transfer costs/spent fuel pool O&M and EP fees

^[3] Columns may not add due to rounding

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APPENDIX A

UNIT COST FACTOR DEVELOPMENT

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**APPENDIX A
UNIT COST FACTOR DEVELOPMENT**

Example: Unit Factor for Removal of Contaminated Heat Exchanger < 3,000 lbs.

1. SCOPE

Heat exchangers weighing < 3,000 lbs. will be removed in one piece using a crane or small hoist. They will be disconnected from the inlet and outlet piping. The heat exchanger will be sent to the waste processing area.

2. CALCULATIONS

Act ID	Activity Description	Activity Duration (minutes)	Critical Duration (minutes)
a	Remove insulation	60	(b)
b	Mount pipe cutters	60	60
c	Install contamination controls	20	(b)
d	Disconnect inlet and outlet lines	60	60
e	Cap openings	20	(d)
f	Rig for removal	30	30
g	Unbolt from mounts	30	30
h	Remove contamination controls	15	15
i	Remove, wrap in plastic, send to waste processing area	60	60
Totals (Activity/Critical)		355	255

Duration adjustment(s):

+ Respiratory protection adjustment (50% of critical duration) 128

+ Radiation/ALARA adjustment (37.08% of critical duration) 95

Adjusted work duration 478

+ Protective clothing adjustment (30% of adjusted duration) 143

Productive work duration 621

+ Work break adjustment (8.33 % of productive duration) 52

Total work duration (minutes) 673

Total duration = 11.217 hours

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3. LABOR REQUIRED

Crew	Number	Duration (hr)	Rate (\$/hr)	Cost
Laborers	3.00	11.217	\$48.08	\$1,617.94
Craftsmen	2.00	11.217	\$63.77	\$1,430.62
Foreman	1.00	11.217	\$66.81	\$749.41
General Foreman	0.25	11.217	\$68.93	\$193.30
Fire Watch	0.05	11.217	\$48.08	\$26.97
Health Physics Technician	1.00	11.217	\$48.84	\$547.84
Total labor cost				\$4,566.08

4. EQUIPMENT & CONSUMABLES COSTS

Equipment Costs	none
Consumables/Materials Costs	
Gas torch consumables 1 @ \$18.60/hour x 1 hour ^[1]	\$18.60
Tarpaulin, oil resistant, fire retardant 50 @ \$0.26 square foot ^[2]	\$13.00
Polypropylene sorbent rolls 50 @ \$0.59/square foot ^[3]	\$29.50
Subtotal cost of equipment and materials	\$61.10
Overhead & sales tax on equipment and materials @ 16.88 %	\$10.31
Total costs, equipment & material	\$71.41

TOTAL COST: Removal of contaminated heat exchanger <3000 pounds: \$4,637.49

Total labor cost: \$4,566.08
Total equipment/material costs: \$71.41
Total craft labor man-hours required per unit: 81.88

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5. NOTES AND REFERENCES

Work difficulty factors were developed in conjunction with the Atomic Industrial Forum (AIF) (now Nuclear Energy Institute) program to standardize nuclear decommissioning cost estimates and are delineated in Volume 1, Chapter 5 of the "Guidelines for Producing Commercial Nuclear Power Plant Decommissioning Cost Estimates," AIF/NESP-036, May 1986.

References for equipment & consumables costs:

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Material and consumable costs were adjusted using the regional indices for Minneapolis, Minnesota.

APPENDIX B

UNIT COST FACTOR LISTING

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APPENDIX B

**UNIT COST FACTOR LISTING
(Power Block Structures Only)**

Unit Cost Factor	Cost/Unit(\$)
Removal of clean instrument and sampling tubing, \$/linear foot	0.53
Removal of clean pipe 0.25 to 2 inches diameter, \$/linear foot	5.65
Removal of clean pipe >2 to 4 inches diameter, \$/linear foot	8.08
Removal of clean pipe >4 to 8 inches diameter, \$/linear foot	15.82
Removal of clean pipe >8 to 14 inches diameter, \$/linear foot	30.47
Removal of clean pipe >14 to 20 inches diameter, \$/linear foot	39.67
Removal of clean pipe >20 to 36 inches diameter, \$/linear foot	58.35
Removal of clean pipe >36 inches diameter, \$/linear foot	69.31
Removal of clean valve >2 to 4 inches	104.62
Removal of clean valve >4 to 8 inches	158.19
Removal of clean valve >8 to 14 inches	304.72
Removal of clean valve >14 to 20 inches	396.71
Removal of clean valve >20 to 36 inches	583.54
Removal of clean valve >36 inches	693.09
Removal of clean pipe hanger for small bore piping	36.39
Removal of clean pipe hanger for large bore piping	128.41
Removal of clean pump, <300 pound	267.99
Removal of clean pump, 300-1000 pound	743.00
Removal of clean pump, 1000-10,000 pound	2,928.22
Removal of clean pump, >10,000 pound	5,667.12
Removal of clean pump motor, 300-1000 pound	310.10
Removal of clean pump motor, 1000-10,000 pound	1,215.95
Removal of clean pump motor, >10,000 pound	2,735.88
Removal of clean heat exchanger <3000 pound	1,573.94
Removal of clean heat exchanger >3000 pound	3,967.62
Removal of clean feedwater heater/deaerator	11,173.70
Removal of clean moisture separator/reheater	22,956.02
Removal of clean tank, <300 gallons	344.59
Removal of clean tank, 300-3000 gallon	1,084.38
Removal of clean tank, >3000 gallons, \$/square foot surface area	9.13

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**UNIT COST FACTOR LISTING
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Unit Cost Factor	Cost/Unit(\$)
Removal of clean electrical equipment, <300 pound	144.80
Removal of clean electrical equipment, 300-1000 pound	504.87
Removal of clean electrical equipment, 1000-10,000 pound	1,009.74
Removal of clean electrical equipment, >10,000 pound	2,400.39
Removal of clean electrical transformer < 30 tons	1,667.04
Removal of clean electrical transformer > 30 tons	4,800.79
Removal of clean standby diesel generator, <100 kW	1,702.74
Removal of clean standby diesel generator, 100 kW to 1 MW	3,800.62
Removal of clean standby diesel generator, >1 MW	7,868.05
Removal of clean electrical cable tray, \$/linear foot	13.64
Removal of clean electrical conduit, \$/linear foot	5.96
Removal of clean mechanical equipment, <300 pound	144.80
Removal of clean mechanical equipment, 300-1000 pound	504.87
Removal of clean mechanical equipment, 1000-10,000 pound	1,009.74
Removal of clean mechanical equipment, >10,000 pound	2,400.39
Removal of clean HVAC equipment, <300 pound	175.09
Removal of clean HVAC equipment, 300-1000 pound	606.63
Removal of clean HVAC equipment, 1000-10,000 pound	1,209.03
Removal of clean HVAC equipment, >10,000 pound	2,400.39
Removal of clean HVAC ductwork, \$/pound	0.56
Removal of contaminated instrument and sampling tubing, \$/linear foot	1.61
Removal of contaminated pipe 0.25 to 2 inches diameter, \$/linear foot	22.32
Removal of contaminated pipe >2 to 4 inches diameter, \$/linear foot	38.62
Removal of contaminated pipe >4 to 8 inches diameter, \$/linear foot	61.15
Removal of contaminated pipe >8 to 14 inches diameter, \$/linear foot	120.59
Removal of contaminated pipe >14 to 20 inches diameter, \$/linear foot	145.06
Removal of contaminated pipe >20 to 36 inches diameter, \$/linear foot	200.97
Removal of contaminated pipe >36 inches diameter, \$/linear foot	237.61
Removal of contaminated valve >2 to 4 inches	465.67
Removal of contaminated valve >4 to 8 inches	562.31

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**UNIT COST FACTOR LISTING
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Unit Cost Factor	Cost/Unit(\$)
Removal of contaminated valve >8 to 14 inches	1,156.26
Removal of contaminated valve >14 to 20 inches	1,471.11
Removal of contaminated valve >20 to 36 inches	1,960.07
Removal of contaminated valve >36 inches	2,326.42
Removal of contaminated pipe hanger for small bore piping	151.00
Removal of contaminated pipe hanger for large bore piping	494.83
Removal of contaminated pump, <300 pound	1,003.91
Removal of contaminated pump, 300-1000 pound	2,337.99
Removal of contaminated pump, 1000-10,000 pound	7,680.15
Removal of contaminated pump, >10,000 pound	18,710.28
Removal of contaminated pump motor, 300-1000 pound	990.50
Removal of contaminated pump motor, 1000-10,000 pound	3,120.94
Removal of contaminated pump motor, >10,000 pound	7,006.89
Removal of contaminated heat exchanger <3000 pound	4,637.49
Removal of contaminated heat exchanger >3000 pound	13,438.40
Removal of contaminated tank, <300 gallons	1,667.37
Removal of contaminated tank, >300 gallons, \$/square foot	32.86
Removal of contaminated electrical equipment, <300 pound	776.77
Removal of contaminated electrical equipment, 300-1000 pound	1,896.68
Removal of contaminated electrical equipment, 1000-10,000 pound	3,652.12
Removal of contaminated electrical equipment, >10,000 pound	7,164.85
Removal of contaminated electrical cable tray, \$/linear foot	37.63
Removal of contaminated electrical conduit, \$/linear foot	17.73
Removal of contaminated mechanical equipment, <300 pound	864.55
Removal of contaminated mechanical equipment, 300-1000 pound	2,096.11
Removal of contaminated mechanical equipment, 1000-10,000 pound	4,029.59
Removal of contaminated mechanical equipment, >10,000 pound	7,164.85
Removal of contaminated HVAC equipment, <300 pound	864.55
Removal of contaminated HVAC equipment, 300-1000 pound	2,096.11
Removal of contaminated HVAC equipment, 1000-10,000 pound	4,029.59

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**UNIT COST FACTOR LISTING
(Power Block Structures Only)**

Unit Cost Factor	Cost/Unit(\$)
Removal of contaminated HVAC equipment, >10,000 pound	7,164.85
Removal of contaminated HVAC ductwork, \$/pound	2.26
Removal/plasma arc cut of contaminated thin metal components, \$/linear in.	4.18
Additional decontamination of surface by washing, \$/square foot	8.64
Additional decontamination of surfaces by hydrolasing, \$/square foot	37.81
Decontamination rig hook up and flush, \$/ 250 foot length	7,318.85
Chemical flush of components/systems, \$/gallon	18.97
Removal of clean standard reinforced concrete, \$/cubic yard	153.75
Removal of grade slab concrete, \$/cubic yard	204.39
Removal of clean concrete floors, \$/cubic yard	402.39
Removal of sections of clean concrete floors, \$/cubic yard	1,196.42
Removal of clean heavily rein concrete w/#9 rebar, \$/cubic yard	260.15
Removal of contaminated heavily rein concrete w/#9 rebar, \$/cubic yard	2,317.34
Removal of clean heavily rein concrete w/#18 rebar, \$/cubic yard	328.93
Removal of contaminated heavily rein concrete w/#18 rebar, \$/cubic yard	3,066.95
Removal heavily rein concrete w/#18 rebar & steel embedments, \$/cubic yard	496.05
Removal of below-grade suspended floors, \$/cubic yard	402.39
Removal of clean monolithic concrete structures, \$/cubic yard	995.46
Removal of contaminated monolithic concrete structures, \$/cubic yard	2,311.65
Removal of clean foundation concrete, \$/cubic yard	783.24
Removal of contaminated foundation concrete, \$/cubic yard	2,154.00
Explosive demolition of bulk concrete, \$/cubic yard	34.23
Removal of clean hollow masonry block wall, \$/cubic yard	109.15
Removal of contaminated hollow masonry block wall, \$/cubic yard	350.81
Removal of clean solid masonry block wall, \$/cubic yard	109.15
Removal of contaminated solid masonry block wall, \$/cubic yard	350.81
Backfill of below-grade voids, \$/cubic yard	33.49
Removal of subterranean tunnels/voids, \$/linear foot	126.53
Placement of concrete for below-grade voids, \$/cubic yard	127.56
Excavation of clean material, \$/cubic yard	3.42

***Prairie Island Nuclear Generating Plant
Decommissioning Cost Analysis***

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APPENDIX B

**UNIT COST FACTOR LISTING
(Power Block Structures Only)**

Unit Cost Factor	Cost/Unit(\$)
Excavation of contaminated material, \$/cubic yard	45.08
Removal of clean concrete rubble (tipping fee included), \$/cubic yard	26.05
Removal of contaminated concrete rubble, \$/cubic yard	29.02
Removal of building by volume, \$/cubic foot	0.34
Removal of clean building metal siding, \$/square foot	1.44
Removal of contaminated building metal siding, \$/square foot	4.70
Removal of standard asphalt roofing, \$/square foot	2.48
Removal of transite panels, \$/square foot	2.33
Scarifying contaminated concrete surfaces (drill & spall), \$/square foot	13.44
Scabbling contaminated concrete floors, \$/square foot	8.34
Scabbling contaminated concrete walls, \$/square foot	22.12
Scabbling contaminated ceilings, \$/square foot	76.00
Scabbling structural steel, \$/square foot	6.69
Removal of clean overhead crane/monorail < 10 ton capacity	707.34
Removal of contaminated overhead crane/monorail < 10 ton capacity	1,945.31
Removal of clean overhead crane/monorail >10-50 ton capacity	1,697.60
Removal of contaminated overhead crane/monorail >10-50 ton capacity	4,667.96
Removal of polar crane > 50 ton capacity	7,088.78
Removal of gantry crane > 50 ton capacity	30,004.89
Removal of structural steel, \$/pound	0.22
Removal of clean steel floor grating, \$/square foot	5.17
Removal of contaminated steel floor grating, \$/square foot	14.63
Removal of clean free standing steel liner, \$/square foot	13.69
Removal of contaminated free standing steel liner, \$/square foot	38.43
Removal of clean concrete-anchored steel liner, \$/square foot	6.85
Removal of contaminated concrete-anchored steel liner, \$/square foot	44.81
Placement of scaffolding in clean areas, \$/square foot	15.75
Placement of scaffolding in contaminated areas, \$/square foot	26.42
Landscaping with topsoil, \$/acre	24,690.75
Cost of CPC B-88 LSA box & preparation for use	2,042.93

***Prairie Island Nuclear Generating Plant
Decommissioning Cost Analysis***

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APPENDIX B

**UNIT COST FACTOR LISTING
(Power Block Structures Only)**

Unit Cost Factor	Cost/Unit(\$)
Cost of CPC B-25 LSA box & preparation for use	1,869.00
Cost of CPC B-12V 12 gauge LSA box & preparation for use	1,524.26
Cost of CPC B-144 LSA box & preparation for use	10,405.29
Cost of LSA drum & preparation for use	206.12
Cost of cask liner for CNSI 8 120A cask (resins)	12,242.81
Cost of cask liner for CNSI 8 120A cask (filters)	8,824.92
Decontamination of surfaces with vacuuming, \$/square foot	0.88

APPENDIX C
DETAILED COST ANALYSIS
SCENARIO 1
DECON DECOMMISSIONING COST ESTIMATE
WITH DOE PICKUP OF INDUSTRY SPENT FUEL STARTING IN 2025

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C-1 Unit 1 Decommissioning Cost Estimate	2
C-2 Unit 2 Decommissioning Cost Estimate	11

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Decommissioning Cost Analysis*

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Table C-1
Prairie Island DECON Unit 1
DOE Pickup of Industry Spent Fuel Starting in 2025 Decommissioning Cost Estimate
(Thousands of 2014 Dollars)

Activity Index	Activity Description	Decon Cost	Removal Cost	Packaging Costs	Transport Costs	Off-Site Processing Costs	LLRW Disposal Costs	Other Costs	Total Contingency	Total Costs	NRC Lic. Term. Costs	Spent Fuel Management Costs	Site Restoration Costs	Processed Volume Cu. Feet	Burial Volumes				Burial / Processed Wt., Lbs.	Craft Manhours	Utility and Contractor Manhours
															Class A Cu. Feet	Class B Cu. Feet	Class C Cu. Feet	GTCC Cu. Feet			
PERIOD 1a - Shutdown through Transition																					
Period 1a Direct Decommissioning Activities																					
1a.1.1	Prepare preliminary decommissioning cost	-	-	-	-	-	-	148	22	170	170	-	-	-	-	-	-	-	-	-	1,300
1a.1.2	Notification of Cessation of Operations									a											
1a.1.3	Remove fuel & source material									n/a											
1a.1.4	Notification of Permanent Defueling									a											
1a.1.5	Deactivate plant systems & process waste									a											
1a.1.6	Prepare and submit PSDAR	-	-	-	-	-	-	227	34	261	261	-	-	-	-	-	-	-	-	-	2,000
1a.1.7	Review plant dwgs & specs.	-	-	-	-	-	-	522	78	601	601	-	-	-	-	-	-	-	-	-	4,600
1a.1.8	Perform detailed rad survey									a											
1a.1.9	Estimate by-product inventory	-	-	-	-	-	-	114	17	131	131	-	-	-	-	-	-	-	-	-	1,000
1a.1.10	End product description	-	-	-	-	-	-	114	17	131	131	-	-	-	-	-	-	-	-	-	1,000
1a.1.11	Detailed by-product inventory	-	-	-	-	-	-	148	22	170	170	-	-	-	-	-	-	-	-	-	1,300
1a.1.12	Define major work sequence	-	-	-	-	-	-	851	128	979	979	-	-	-	-	-	-	-	-	-	7,500
1a.1.13	Perform SER and EA	-	-	-	-	-	-	352	53	405	405	-	-	-	-	-	-	-	-	-	3,100
1a.1.14	Perform Site-Specific Cost Study	-	-	-	-	-	-	568	85	653	653	-	-	-	-	-	-	-	-	-	5,000
1a.1.15	Prepare/submit License Termination Plan	-	-	-	-	-	-	465	70	535	535	-	-	-	-	-	-	-	-	-	4,096
1a.1.16	Receive NRC approval of termination plan									a											
Activity Specifications																					
1a.1.17.1	Plant & temporary facilities	-	-	-	-	-	-	559	84	642	578	-	64	-	-	-	-	-	-	-	4,920
1a.1.17.2	Plant systems	-	-	-	-	-	-	473	71	544	490	-	54	-	-	-	-	-	-	-	4,167
1a.1.17.3	NSSS Decontamination Flush	-	-	-	-	-	-	57	9	65	65	-	-	-	-	-	-	-	-	-	500
1a.1.17.4	Reactor internals	-	-	-	-	-	-	806	121	927	927	-	-	-	-	-	-	-	-	-	7,100
1a.1.17.5	Reactor vessel	-	-	-	-	-	-	738	111	849	849	-	-	-	-	-	-	-	-	-	6,500
1a.1.17.6	Biological shield	-	-	-	-	-	-	57	9	65	65	-	-	-	-	-	-	-	-	-	500
1a.1.17.7	Steam generators	-	-	-	-	-	-	354	53	407	407	-	-	-	-	-	-	-	-	-	3,120
1a.1.17.8	Reinforced concrete	-	-	-	-	-	-	182	27	209	104	-	104	-	-	-	-	-	-	-	1,600
1a.1.17.9	Main Turbine	-	-	-	-	-	-	45	7	52	-	-	52	-	-	-	-	-	-	-	400
1a.1.17.10	Main Condensers	-	-	-	-	-	-	45	7	52	-	-	52	-	-	-	-	-	-	-	400
1a.1.17.11	Plant structures & buildings	-	-	-	-	-	-	354	53	407	204	-	204	-	-	-	-	-	-	-	3,120
1a.1.17.12	Waste management	-	-	-	-	-	-	522	78	601	601	-	-	-	-	-	-	-	-	-	4,600
1a.1.17.13	Facility & site closeout	-	-	-	-	-	-	102	15	118	59	-	59	-	-	-	-	-	-	-	900
1a.1.17	Total	-	-	-	-	-	-	4,294	644	4,939	4,349	-	590	-	-	-	-	-	-	-	37,827
Planning & Site Preparations																					
1a.1.18	Prepare dismantling sequence	-	-	-	-	-	-	272	41	313	313	-	-	-	-	-	-	-	-	-	2,400
1a.1.19	Plant prep. & temp. svces	-	-	-	-	-	-	3,000	450	3,450	3,450	-	-	-	-	-	-	-	-	-	-
1a.1.20	Design water clean-up system	-	-	-	-	-	-	159	24	183	183	-	-	-	-	-	-	-	-	-	1,400
1a.1.21	Rigging/Cont. Cntrl Envlp/s/tooling/etc.	-	-	-	-	-	-	2,300	345	2,645	2,645	-	-	-	-	-	-	-	-	-	-
1a.1.22	Procure casks/liners & containers	-	-	-	-	-	-	140	21	161	161	-	-	-	-	-	-	-	-	-	1,230
1a.1	Subtotal Period 1a Activity Costs	-	-	-	-	-	-	13,673	2,051	15,724	15,134	-	590	-	-	-	-	-	-	-	73,753
Period 1a Additional Costs																					
1a.2.1	Spent Fuel Pool Isolation	-	-	-	-	-	-	10,813	1,622	12,434	12,434	-	-	-	-	-	-	-	-	-	-
1a.2	Subtotal Period 1a Additional Costs	-	-	-	-	-	-	10,813	1,622	12,434	12,434	-	-	-	-	-	-	-	-	-	-
Period 1a Collateral Costs																					
1a.3	Subtotal Period 1a Collateral Costs	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Period 1a Period-Dependent Costs																					
1a.4.1	Insurance	-	-	-	-	-	-	1,096	110	1,205	1,205	-	-	-	-	-	-	-	-	-	-
1a.4.2	Property taxes	-	-	-	-	-	-	1,580	158	1,738	1,738	-	-	-	-	-	-	-	-	-	-
1a.4.3	Health physics supplies	-	490	-	-	-	-	-	123	613	613	-	-	-	-	-	-	-	-	-	-
1a.4.4	Heavy equipment rental	-	528	-	-	-	-	-	79	608	608	-	-	-	-	-	-	-	-	-	-
1a.4.5	Disposal of DAW generated	-	-	13	4	-	48	-	14	79	79	-	-	-	610	-	-	-	12,190	20	-
1a.4.6	Plant energy budget	-	-	-	-	-	-	3,091	464	3,554	3,554	-	-	-	-	-	-	-	-	-	-
1a.4.7	NRC Fees	-	-	-	-	-	-	1,181	118	1,299	1,299	-	-	-	-	-	-	-	-	-	-
1a.4.8	Emergency Planning Fees	-	-	-	-	-	-	1,484	148	1,632	-	1,632	-	-	-	-	-	-	-	-	-
1a.4.9	Fixed Overhead	-	-	-	-	-	-	1,503	225	1,728	1,728	-	-	-	-	-	-	-	-	-	-
1a.4.10	Spent Fuel Pool O&M	-	-	-	-	-	-	396	59	455	-	455	-	-	-	-	-	-	-	-	-
1a.4.11	ISFSI Operating Costs	-	-	-	-	-	-	48	7	55	-	55	-	-	-	-	-	-	-	-	-
1a.4.12	Railroad Track Maintenance	-	-	-	-	-	-	53	8	61	-	-	61	-	-	-	-	-	-	-	-
1a.4.13	Security Staff Cost	-	-	-	-	-	-	394	59	453	453	-	-	-	-	-	-	-	-	-	12,264
1a.4.14	Utility Staff Cost	-	-	-	-	-	-	21,482	3,222	24,705	24,705	-	-	-	-	-	-	-	-	-	423,400
1a.4	Subtotal Period 1a Period-Dependent Costs	-	1,018	13	4	-	48	32,307	4,795	38,185	35,981	2,142	61	-	610	-	-	-	12,190	20	435,664
1a.0	TOTAL PERIOD 1a COST	-	1,018	13	4	-	48	56,793	8,468	66,343	63,550	2,142	651	-	610	-	-	-	12,190	20	509,417

*Prairie Island Nuclear Nuclear Generating Plant
Decommissioning Cost Analysis*

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Table C-1
Prairie Island DECON Unit 1
DOE Pickup of Industry Spent Fuel Starting in 2025 Decommissioning Cost Estimate
(Thousands of 2014 Dollars)

Activity Index	Activity Description	Decon Cost	Removal Cost	Packaging Costs	Transport Costs	Off-Site Processing Costs	LLRW Disposal Costs	Other Costs	Total Contingency	Total Costs	NRC Lic. Term. Costs	Spent Fuel Management Costs	Site Restoration Costs	Processed Volume Cu. Feet	Burial Volumes				Burial / Processed Wt., Lbs.	Craft Manhours	Utility and Contractor Manhours
															Class A Cu. Feet	Class B Cu. Feet	Class C Cu. Feet	GTCC Cu. Feet			
PERIOD 1b - Decommissioning Preparations																					
Period 1b Direct Decommissioning Activities																					
Detailed Work Procedures																					
1b.1.1.1	Plant systems	-	-	-	-	-	-	537	81	618	556	-	62	-	-	-	-	-	-	-	4,733
1b.1.1.2	NSSS Decontamination Flush	-	-	-	-	-	-	114	17	131	131	-	-	-	-	-	-	-	-	-	1,000
1b.1.1.3	Reactor internals	-	-	-	-	-	-	284	43	326	326	-	-	-	-	-	-	-	-	-	2,500
1b.1.1.4	Remaining buildings	-	-	-	-	-	-	153	23	176	44	-	132	-	-	-	-	-	-	-	1,350
1b.1.1.5	CRD cooling assembly	-	-	-	-	-	-	114	17	131	131	-	-	-	-	-	-	-	-	-	1,000
1b.1.1.6	CRD housings & ICI tubes	-	-	-	-	-	-	114	17	131	131	-	-	-	-	-	-	-	-	-	1,000
1b.1.1.7	Incore instrumentation	-	-	-	-	-	-	114	17	131	131	-	-	-	-	-	-	-	-	-	1,000
1b.1.1.8	Reactor vessel	-	-	-	-	-	-	412	62	474	474	-	-	-	-	-	-	-	-	-	3,630
1b.1.1.9	Facility closeout	-	-	-	-	-	-	136	20	157	78	-	78	-	-	-	-	-	-	-	1,200
1b.1.1.10	Missile shields	-	-	-	-	-	-	51	8	59	59	-	-	-	-	-	-	-	-	-	450
1b.1.1.11	Biological shield	-	-	-	-	-	-	136	20	157	157	-	-	-	-	-	-	-	-	-	1,200
1b.1.1.12	Steam generators	-	-	-	-	-	-	522	78	601	601	-	-	-	-	-	-	-	-	-	4,600
1b.1.1.13	Reinforced concrete	-	-	-	-	-	-	114	17	131	65	-	65	-	-	-	-	-	-	-	1,000
1b.1.1.14	Main Turbine	-	-	-	-	-	-	177	27	204	-	-	204	-	-	-	-	-	-	-	1,560
1b.1.1.15	Main Condensers	-	-	-	-	-	-	177	27	204	-	-	204	-	-	-	-	-	-	-	1,560
1b.1.1.16	Auxiliary building	-	-	-	-	-	-	310	46	356	321	-	36	-	-	-	-	-	-	-	2,730
1b.1.1.17	Reactor building	-	-	-	-	-	-	310	46	356	321	-	36	-	-	-	-	-	-	-	2,730
1b.1.1	Total	-	-	-	-	-	-	3,774	566	4,340	3,524	-	816	-	-	-	-	-	-	-	33,243
1b.1.2	Decon primary loop	506	-	-	-	-	-	-	253	760	760	-	-	-	-	-	-	-	-	1,067	-
1b.1	Subtotal Period 1b Activity Costs	506	-	-	-	-	-	3,774	819	5,100	4,284	-	816	-	-	-	-	-	-	1,067	33,243
Period 1b Additional Costs																					
1b.2.1	Site Characterization	-	-	-	-	-	-	3,122	937	4,059	4,059	-	-	-	-	-	-	-	-	21,020	8,332
1b.2.2	Mixed/Hazardous Waste	-	-	281	80	152	-	-	63	576	576	-	-	6,133	-	-	-	-	351,986	2,361	-
1b.2.3	Asbestos Abatement	-	2,324	2	73	-	1,312	-	920	4,632	4,632	-	-	-	12,843	-	-	-	166,959	20,907	-
1b.2	Subtotal Period 1b Additional Costs	-	2,324	283	153	152	1,312	3,122	1,920	9,267	9,267	-	-	6,133	12,843	-	-	-	518,945	44,288	8,332
Period 1b Collateral Costs																					
1b.3.1	Decon equipment	881	-	-	-	-	-	-	132	1,013	1,013	-	-	-	-	-	-	-	-	-	-
1b.3.2	DOC staff relocation expenses	-	-	-	-	-	-	1,708	256	1,964	1,964	-	-	-	-	-	-	-	-	-	-
1b.3.3	Process decommissioning water waste	24	-	16	40	-	68	-	36	183	183	-	-	-	152	-	-	-	9,121	30	-
1b.3.4	Process decommissioning chemical flush waste	1	-	58	212	-	3,530	-	921	4,722	4,722	-	-	-	-	588	-	-	62,689	110	-
1b.3.5	Small tool allowance	-	30	-	-	-	-	-	5	35	35	-	-	-	-	-	-	-	-	-	-
1b.3.6	Pipe cutting equipment	-	1,100	-	-	-	-	-	165	1,265	1,265	-	-	-	-	-	-	-	-	-	-
1b.3.7	Decon rig	1,500	-	-	-	-	-	-	225	1,725	1,725	-	-	-	-	-	-	-	-	-	-
1b.3.8	Spent Fuel Capital and Transfer	-	-	-	-	-	-	2,031	305	2,336	-	2,336	-	-	-	-	-	-	-	-	-
1b.3	Subtotal Period 1b Collateral Costs	2,406	1,130	73	252	-	3,598	3,738	2,045	13,242	10,907	2,336	-	-	-	152	588	-	71,810	140	-
Period 1b Period-Dependent Costs																					
1b.4.1	Decon supplies	27	-	-	-	-	-	-	7	34	34	-	-	-	-	-	-	-	-	-	-
1b.4.2	Insurance	-	-	-	-	-	-	552	55	608	608	-	-	-	-	-	-	-	-	-	-
1b.4.3	Property taxes	-	-	-	-	-	-	796	80	876	876	-	-	-	-	-	-	-	-	-	-
1b.4.4	Health physics supplies	-	383	-	-	-	-	-	96	478	478	-	-	-	-	-	-	-	-	-	-
1b.4.5	Heavy equipment rental	-	266	-	-	-	-	-	40	306	306	-	-	-	-	-	-	-	-	-	-
1b.4.6	Disposal of DAW generated	-	-	7	2	-	28	-	8	46	46	-	-	-	360	-	-	-	7,197	12	-
1b.4.7	Plant energy budget	-	-	-	-	-	-	3,116	467	3,584	3,584	-	-	-	-	-	-	-	-	-	-
1b.4.8	NRC Fees	-	-	-	-	-	-	348	35	383	383	-	-	-	-	-	-	-	-	-	-
1b.4.9	Emergency Planning Fees	-	-	-	-	-	-	748	75	823	-	823	-	-	-	-	-	-	-	-	-
1b.4.10	Fixed Overhead	-	-	-	-	-	-	757	114	871	871	-	-	-	-	-	-	-	-	-	-
1b.4.11	Spent Fuel Pool O&M	-	-	-	-	-	-	199	30	229	-	229	-	-	-	-	-	-	-	-	-
1b.4.12	ISFSI Operating Costs	-	-	-	-	-	-	24	4	28	-	28	-	-	-	-	-	-	-	-	-
1b.4.13	Railroad Track Maintenance	-	-	-	-	-	-	27	4	31	-	-	31	-	-	-	-	-	-	-	-
1b.4.14	Security Staff Cost	-	-	-	-	-	-	199	30	228	228	-	-	-	-	-	-	-	-	-	6,182
1b.4.15	DOC Staff Cost	-	-	-	-	-	-	4,781	717	5,498	5,498	-	-	-	-	-	-	-	-	-	64,137
1b.4.16	Utility Staff Cost	-	-	-	-	-	-	10,885	1,633	12,518	12,518	-	-	-	-	-	-	-	-	-	214,491
1b.4	Subtotal Period 1b Period-Dependent Costs	27	649	7	2	-	28	22,433	3,393	26,541	25,430	1,080	31	-	360	-	-	-	7,197	12	284,811
1b.0	TOTAL PERIOD 1b COST	2,940	4,103	364	407	152	4,938	33,068	8,177	54,150	49,887	3,415	847	6,133	13,355	588	-	-	597,952	45,506	326,386
PERIOD 1 TOTALS		2,940	5,122	377	411	152	4,986	89,861	16,645	120,493	113,437	5,557	1,498	6,133	13,964	588	-	-	610,142	45,526	835,803

Prairie Island Nuclear Nuclear Generating Plant
Decommissioning Cost Analysis

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Table C-1
Prairie Island DECON Unit 1
DOE Pickup of Industry Spent Fuel Starting in 2025 Decommissioning Cost Estimate
(Thousands of 2014 Dollars)

Activity Index	Activity Description	Decon Cost	Removal Cost	Packaging Costs	Transport Costs	Off-Site Processing Costs	LLRW Disposal Costs	Other Costs	Total Contingency	Total Costs	NRC Lic. Term. Costs	Spent Fuel Management Costs	Site Restoration Costs	Processed Volume Cu. Feet	Burial Volumes				Burial / Processed Wt., Lbs.	Craft Manhours	Utility and Contractor Manhours
															Class A Cu. Feet	Class B Cu. Feet	Class C Cu. Feet	GTCC Cu. Feet			
PERIOD 2a - Large Component Removal																					
Period 2a Direct Decommissioning Activities																					
Nuclear Steam Supply System Removal																					
2a.1.1.1	Reactor Coolant Piping	45	38	6	8	-	144	-	70	313	313	-	-	-	305	-	-	-	34,809	1,414	-
2a.1.1.2	Pressurizer Relief Tank	20	17	4	5	-	88	-	37	172	172	-	-	-	192	-	-	-	21,288	625	-
2a.1.1.3	Reactor Coolant Pumps & Motors	48	56	98	86	-	711	-	238	1,238	1,238	-	-	-	2,332	-	-	-	295,800	2,049	100
2a.1.1.4	Pressurizer	43	64	459	88	-	669	-	264	1,587	1,587	-	-	-	2,196	-	-	-	185,015	2,355	938
2a.1.1.5	Steam Generators	199	2,924	2,014	1,728	1,205	3,449	-	2,334	13,853	13,853	-	-	18,672	11,316	-	-	-	1,668,341	11,617	2,875
2a.1.1.6	CRDMs/ICIs/Service Structure Removal	253	238	210	48	-	736	-	398	1,884	1,884	-	-	-	4,797	-	-	-	177,400	8,104	-
2a.1.1.7	Reactor Vessel Internals	69	2,629	24,947	1,032	-	7,677	255	12,378	48,987	48,987	-	-	-	501	125	673	-	164,922	22,200	1,020
2a.1.1.8	Reactor Vessel	79	4,539	1,669	710	-	1,890	255	5,022	14,163	14,163	-	-	-	5,690	-	-	-	570,074	22,200	1,020
2a.1.1	Totals	756	10,505	29,408	3,705	1,205	15,365	510	20,742	82,195	82,195	-	-	18,672	27,330	125	673	-	3,117,649	70,563	5,953
Removal of Major Equipment																					
2a.1.2	Main Turbine/Generator	-	272	180	58	263	296	-	208	1,277	1,277	-	-	2,131	1,187	-	-	-	206,316	4,667	-
2a.1.3	Main Condensers	-	2,284	115	51	352	435	-	752	3,989	3,989	-	-	3,800	1,587	-	-	-	275,903	39,151	-
Cascading Costs from Clean Building Demolition																					
2a.1.4.1	Reactor	-	991	-	-	-	-	-	149	1,140	1,140	-	-	-	-	-	-	-	-	11,181	-
2a.1.4	Totals	-	991	-	-	-	-	-	149	1,140	1,140	-	-	-	-	-	-	-	-	11,181	-
Disposal of Plant Systems																					
2a.1.5.1	Air Removal	-	25	-	-	-	-	-	4	29	-	-	29	-	-	-	-	-	-	452	-
2a.1.5.2	Auxiliary Feedwater	-	37	-	-	-	-	-	6	42	-	-	42	-	-	-	-	-	-	670	-
2a.1.5.3	Auxiliary Feedwater - RCA	-	37	0	1	18	-	-	12	69	69	-	-	215	-	-	-	-	8,722	601	-
2a.1.5.4	Bleed Steam	-	72	-	-	-	-	-	11	83	-	-	83	-	-	-	-	-	-	1,335	-
2a.1.5.5	Caustic Addition - RCA	-	30	0	1	19	-	-	11	63	63	-	-	233	-	-	-	-	9,453	444	-
2a.1.5.6	Chemical Feed	-	16	-	-	-	-	-	2	18	-	-	18	-	-	-	-	-	-	304	-
2a.1.5.7	Chemical Feed - RCA	-	1	0	0	1	-	-	0	2	2	-	-	6	-	-	-	-	243	12	-
2a.1.5.8	Circulating Water	-	34	-	-	-	-	-	5	39	-	-	39	-	-	-	-	-	-	619	-
2a.1.5.9	Condensate	-	382	-	-	-	-	-	57	440	-	-	440	-	-	-	-	-	-	6,837	-
2a.1.5.10	Condensate Polishing	-	189	-	-	-	-	-	28	218	-	-	218	-	-	-	-	-	-	3,420	-
2a.1.5.11	Condensate Polishing - RCA	-	148	3	13	174	-	-	65	403	403	-	-	2,078	-	-	-	-	84,395	2,329	-
2a.1.5.12	Electro-hydraulic	-	7	-	-	-	-	-	1	8	-	-	8	-	-	-	-	-	-	127	-
2a.1.5.13	Feedwater	-	123	-	-	-	-	-	18	141	-	-	141	-	-	-	-	-	-	2,215	-
2a.1.5.14	Feedwater - RCA	-	157	5	20	268	-	-	83	533	533	-	-	3,208	-	-	-	-	130,294	2,651	-
2a.1.5.15	Gland Seal	-	27	-	-	-	-	-	4	31	-	-	31	-	-	-	-	-	-	505	-
2a.1.5.16	Heater Drain	-	321	-	-	-	-	-	48	370	-	-	370	-	-	-	-	-	-	5,881	-
2a.1.5.17	Internal Circ Water & CDSR	-	21	-	-	-	-	-	3	25	-	-	25	-	-	-	-	-	-	389	-
2a.1.5.18	Main Gen/Exciter/Transformer	-	0	-	-	-	-	-	0	0	-	-	0	-	-	-	-	-	-	5	-
2a.1.5.19	Main Steam	-	93	-	-	-	-	-	14	107	-	-	107	-	-	-	-	-	-	1,690	-
2a.1.5.20	Main Steam - RCA	-	295	8	31	422	-	-	143	899	899	-	-	5,044	-	-	-	-	204,825	4,956	-
2a.1.5.21	Steam Generator Blowdown	-	387	20	23	170	188	-	175	963	963	-	-	2,031	686	-	-	-	127,773	6,667	-
2a.1.5.22	Steam Generators	-	4	-	-	-	-	-	1	5	-	-	5	-	-	-	-	-	-	75	-
2a.1.5.23	Turbine & Moisture Separators	-	312	-	-	-	-	-	47	358	-	-	358	-	-	-	-	-	-	5,609	-
2a.1.5.24	Turbine Oil Purification	-	57	-	-	-	-	-	8	65	-	-	65	-	-	-	-	-	-	1,003	-
2a.1.5	Totals	-	2,776	37	90	1,072	188	-	747	4,910	2,931	-	1,979	12,815	686	-	-	-	565,705	48,794	-
2a.1.6	Scaffolding in support of decommissioning	-	772	3	1	13	3	-	196	988	988	-	-	138	12	-	-	-	7,016	6,368	-
2a.1	Subtotal Period 2a Activity Costs	756	17,600	29,743	3,905	2,905	16,287	510	22,793	94,499	92,520	-	1,979	37,556	30,801	125	673	-	4,172,589	180,724	5,953
Period 2a Additional Costs																					
2a.2.1	Remedial Action Surveys	-	-	-	-	-	-	1,299	390	1,689	1,689	-	-	-	-	-	-	-	-	26,595	-
2a.2	Subtotal Period 2a Additional Costs	-	-	-	-	-	-	1,299	390	1,689	1,689	-	-	-	-	-	-	-	-	26,595	-
Period 2a Collateral Costs																					
2a.3.1	Process decommissioning water waste	47	-	31	79	-	135	-	72	365	365	-	-	-	303	-	-	-	18,203	59	-
2a.3.2	Process decommissioning chemical flush waste	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2a.3.3	Small tool allowance	-	195	-	-	-	-	-	29	224	202	-	22	-	-	-	-	-	-	-	-
2a.3.4	Spent Fuel Capital and Transfer	-	-	-	-	-	-	17,145	2,572	19,717	-	19,717	-	-	-	-	-	-	-	-	-
2a.3.5	On-site survey and release of 0.0 tons clean metallic waste	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2a.3	Subtotal Period 2a Collateral Costs	47	195	31	79	-	135	17,145	2,673	20,306	567	19,717	22	-	303	-	-	-	18,203	59	-

Table C-1
Prairie Island DECON Unit 1
DOE Pickup of Industry Spent Fuel Starting in 2025 Decommissioning Cost Estimate
(Thousands of 2014 Dollars)

Activity Index	Activity Description	Decon Cost	Removal Cost	Packaging Costs	Transport Costs	Off-Site	LLRW	Other Costs	Total Contingency	Total Costs	NRC	Spent Fuel Management Costs	Site Restoration Costs	Processed Volume Cu. Feet	Burial Volumes				Burial / Processed Wt., Lbs.	Craft Manhours	Utility and
						Processing Costs	Disposal Costs				Lic. Term. Costs				Class A Cu. Feet	Class B Cu. Feet	Class C Cu. Feet	GTCC Cu. Feet			Contractor Manhours
Period 2a Period-Dependent Costs																					
2a.4.1	Decon supplies	69	-	-	-	-	-	-	17	86	86	-	-	-	-	-	-	-	-	-	-
2a.4.2	Insurance	-	-	-	-	-	-	640	64	704	704	-	-	-	-	-	-	-	-	-	-
2a.4.3	Property taxes	-	-	-	-	-	-	1,998	200	2,197	1,978	-	220	-	-	-	-	-	-	-	-
2a.4.4	Health physics supplies	-	1,583	-	-	-	-	-	396	1,978	1,978	-	-	-	-	-	-	-	-	-	-
2a.4.5	Heavy equipment rental	-	2,598	-	-	-	-	-	390	2,988	2,988	-	-	-	-	-	-	-	-	-	-
2a.4.6	Disposal of DAW generated	-	-	73	24	-	277	-	80	453	453	-	-	-	3,519	-	-	-	70,370	115	-
2a.4.7	Plant energy budget	-	-	-	-	-	-	3,757	564	4,320	4,320	-	-	-	-	-	-	-	-	-	-
2a.4.8	NRC Fees	-	-	-	-	-	-	801	80	881	881	-	-	-	-	-	-	-	-	-	-
2a.4.9	Emergency Planning Fees	-	-	-	-	-	-	1,519	152	1,671	-	1,671	-	-	-	-	-	-	-	-	-
2a.4.10	Fixed Overhead	-	-	-	-	-	-	1,568	235	1,803	1,803	-	-	-	-	-	-	-	-	-	-
2a.4.11	Spent Fuel Pool O&M	-	-	-	-	-	-	506	76	582	-	582	-	-	-	-	-	-	-	-	-
2a.4.12	ISFSI Operating Costs	-	-	-	-	-	-	61	9	70	-	70	-	-	-	-	-	-	-	-	-
2a.4.13	Railroad Track Maintenance	-	-	-	-	-	-	267	40	307	-	-	307	-	-	-	-	-	-	-	-
2a.4.14	Security Staff Cost	-	-	-	-	-	-	472	71	543	543	-	-	-	-	-	-	-	-	-	14,677
2a.4.15	DOC Staff Cost	-	-	-	-	-	-	14,721	2,208	16,929	16,929	-	-	-	-	-	-	-	-	-	202,811
2a.4.16	Utility Staff Cost	-	-	-	-	-	-	19,903	2,985	22,889	22,889	-	-	-	-	-	-	-	-	-	377,016
2a.4	Subtotal Period 2a Period-Dependent Costs	69	4,181	73	24	-	277	46,213	7,567	58,402	55,553	2,323	526	-	3,519	-	-	-	70,370	115	594,504
2a.0	TOTAL PERIOD 2a COST	872	21,976	29,847	4,008	2,905	16,699	65,166	33,423	174,896	150,328	22,040	2,528	37,556	34,623	125	673	-	4,261,163	207,493	600,457
PERIOD 2b - Site Decontamination																					
Period 2b Direct Decommissioning Activities																					
Disposal of Plant Systems																					
2b.1.1.1	Aux Bldg Normal Ventilation	-	2	0	0	0	-	-	0	2	2	-	-	3	-	-	-	-	140	29	-
2b.1.1.2	Battery Rm Special Ventilation	-	0	-	-	-	-	-	0	0	-	-	0	-	-	-	-	-	-	6	-
2b.1.1.3	Buildings Maintenance	-	4	-	-	-	-	-	1	4	-	-	4	-	-	-	-	-	-	65	-
2b.1.1.4	Chemical & Volume Control	934	1,126	80	72	376	774	-	1,017	4,379	4,379	-	-	4,498	2,846	-	-	-	369,246	34,533	-
2b.1.1.5	Component Cooling - RCA	-	688	19	77	1,040	-	-	341	2,166	2,166	-	-	12,427	-	-	-	-	504,675	11,242	-
2b.1.1.6	Containment Cooling	-	60	-	-	-	-	-	9	69	-	-	69	-	-	-	-	-	-	1,086	-
2b.1.1.7	Containment Cooling - RCA	-	245	5	21	284	-	-	108	664	664	-	-	3,400	-	-	-	-	138,090	3,971	-
2b.1.1.8	Containment Hydrogen Control - RCA	-	24	0	1	9	-	-	8	41	41	-	-	105	-	-	-	-	4,278	401	-
2b.1.1.9	Containment Spray - RCA	-	75	1	5	73	-	-	31	185	185	-	-	868	-	-	-	-	35,249	1,217	-
2b.1.1.10	Containment Ventilation	-	208	22	42	414	202	-	173	1,062	1,062	-	-	4,951	737	-	-	-	249,786	3,668	-
2b.1.1.11	Cooling Water	-	131	-	-	-	-	-	20	150	-	-	150	-	-	-	-	-	-	2,396	-
2b.1.1.12	Cooling Water - RCA	-	527	12	48	646	-	-	237	1,471	1,471	-	-	7,728	-	-	-	-	313,832	8,594	-
2b.1.1.13	D1 Emergency Diesel	-	40	-	-	-	-	-	6	47	-	-	47	-	-	-	-	-	-	730	-
2b.1.1.14	D2 Emergency Diesel	-	29	-	-	-	-	-	4	33	-	-	33	-	-	-	-	-	-	522	-
2b.1.1.15	Diesel Rooms Ventilation	-	8	-	-	-	-	-	1	9	-	-	9	-	-	-	-	-	-	135	-
2b.1.1.16	Electrical - Clean	-	1,543	-	-	-	-	-	232	1,775	-	-	1,775	-	-	-	-	-	-	26,981	-
2b.1.1.17	Electrical - Contaminated	-	489	6	17	211	26	-	164	913	913	-	-	2,527	95	-	-	-	108,935	8,377	-
2b.1.1.18	Electrical - Decontaminated	-	2,990	37	146	1,970	-	-	1,069	6,212	6,212	-	-	23,551	-	-	-	-	956,401	49,378	-
2b.1.1.19	Fuel Handling	-	99	6	9	76	60	-	53	302	302	-	-	908	218	-	-	-	51,280	1,784	-
2b.1.1.20	Fuel Oil	-	98	-	-	-	-	-	15	113	-	-	113	-	-	-	-	-	-	1,697	-
2b.1.1.21	HVAC - Clean	-	96	-	-	-	-	-	14	111	-	-	111	-	-	-	-	-	-	1,891	-
2b.1.1.22	HVAC - Contaminated	-	315	7	22	273	34	-	132	783	783	-	-	3,261	123	-	-	-	140,573	5,032	-
2b.1.1.23	Incore Instrumentation	0	23	1	1	5	16	-	11	57	57	-	-	60	57	-	-	-	6,177	425	-
2b.1.1.24	Misc Drains & Vents	-	188	14	10	33	141	-	90	477	477	-	-	390	514	-	-	-	49,900	3,091	-
2b.1.1.25	Reactor Coolant	127	250	20	14	29	214	-	188	841	841	-	-	344	777	-	-	-	65,413	6,470	-
2b.1.1.26	Reactor Hot Sampling	123	110	11	6	5	94	-	115	465	465	-	-	66	342	-	-	-	25,347	3,946	-
2b.1.1.27	Reactor Makeup	-	59	-	-	-	-	-	9	68	-	-	68	-	-	-	-	-	-	1,042	-
2b.1.1.28	Reactor Vessel	8	16	1	0	2	4	-	9	40	40	-	-	26	14	-	-	-	2,011	425	-
2b.1.1.29	Residual Heat Removal	310	338	81	68	242	893	-	517	2,450	2,450	-	-	2,895	3,252	-	-	-	332,849	7,621	-
2b.1.1.30	Safeguards Chilled Water	-	14	-	-	-	-	-	2	16	-	-	16	-	-	-	-	-	-	259	-
2b.1.1.31	Safety Injection	-	727	38	60	568	316	-	359	2,067	2,067	-	-	6,788	1,156	-	-	-	351,793	12,561	-
2b.1.1.32	Sampling	-	48	3	2	5	29	-	21	109	109	-	-	59	107	-	-	-	9,505	811	-
2b.1.1.33	Shield Bldg Ventilation	-	114	13	21	180	135	-	94	556	556	-	-	2,152	491	-	-	-	119,838	2,030	-
2b.1.1.34	Station & Instrument Air	-	16	-	-	-	-	-	2	18	-	-	18	-	-	-	-	-	-	300	-
2b.1.1.35	Station & Instrument Air - RCA	-	66	1	2	28	-	-	21	117	117	-	-	332	-	-	-	-	13,496	1,053	-
2b.1.1.36	Turbine Bldg Traps & Drains	-	40	-	-	-	-	-	6	46	-	-	46	-	-	-	-	-	-	767	-
2b.1.1.37	Unit Coolers	-	34	-	-	-	-	-	5	39	-	-	39	-	-	-	-	-	-	611	-
2b.1.1.38	Unit Coolers - RCA	-	44	0	1	19	-	-	14	79	79	-	-	230	-	-	-	-	9,348	683	-
2b.1.1	Totals	1,502	10,885	379	648	6,489	2,938	-	5,098	27,938	25,440	-	2,498	77,571	10,728	-	-	-	3,858,165	205,829	-
2b.1.2	Scaffolding in support of decommissioning	-	965	4	1	16	4	-	245	1,235	1,235	-	-	173	15	-	-	-	8,770	7,960	-

Prairie Island Nuclear Nuclear Generating Plant
Decommissioning Cost Analysis

Table C-1
Prairie Island DECON Unit 1
DOE Pickup of Industry Spent Fuel Starting in 2025 Decommissioning Cost Estimate
(Thousands of 2014 Dollars)

Activity Index	Activity Description	Decon Cost	Removal Cost	Packaging Costs	Transport Costs	Off-Site	LLRW	Other Costs	Total Contingency	Total Costs	NRC	Spent Fuel Management Costs	Site Restoration Costs	Processed Volume Cu. Feet	Burial Volumes				Burial / Processed Wt., Lbs.	Craft Manhours	Utility and
						Processing Costs	Disposal Costs				Lic. Term. Costs				Class A Cu. Feet	Class B Cu. Feet	Class C Cu. Feet	GTCC Cu. Feet			Contractor Manhours
Decontamination of Site Buildings																					
2b.1.3.1	Reactor	1,009	2,385	127	871	187	10,692	-	3,945	19,215	19,215	-	-	2,230	57,414	-	-	-	3,559,624	50,842	-
2b.1.3.2	Backwash Waste Receiving Tank	-	25	1	12	-	84	-	29	151	151	-	-	-	507	-	-	-	43,896	299	-
2b.1.3	Totals	1,009	2,409	128	883	187	10,776	-	3,974	19,365	19,365	-	-	2,230	57,921	-	-	-	3,603,520	51,140	-
2b.1	Subtotal Period 2b Activity Costs	2,511	14,258	511	1,532	6,692	13,718	-	9,317	48,539	46,040	-	2,498	79,974	68,664	-	-	-	7,470,455	264,930	-
Period 2b Additional Costs																					
2b.2.1	Remedial Action Surveys	-	-	-	-	-	-	1,243	373	1,616	1,616	-	-	-	-	-	-	-	-	25,456	-
2b.2.2	Operational Equipment	-	-	9	31	302	-	-	51	391	391	-	-	5,855	-	-	-	-	146,375	16	-
2b.2	Subtotal Period 2b Additional Costs	-	-	9	31	302	-	1,243	424	2,008	2,008	-	-	5,855	-	-	-	-	146,375	25,472	-
Period 2b Collateral Costs																					
2b.3.1	Process decommissioning water waste	105	-	70	179	-	304	-	162	821	821	-	-	-	684	-	-	-	41,028	133	-
2b.3.2	Process decommissioning chemical flush waste	2	-	86	315	-	691	-	230	1,324	1,324	-	-	-	875	-	-	-	93,252	164	-
2b.3.3	Small tool allowance	-	246	-	-	-	-	-	37	283	283	-	-	-	-	-	-	-	-	-	-
2b.3.4	Spent Fuel Capital and Transfer	-	-	-	-	-	-	7,662	1,149	8,812	-	8,812	-	-	-	-	-	-	-	-	-
2b.3.5	On-site survey and release of 0.0 tons clean metallic waste	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2b.3	Subtotal Period 2b Collateral Costs	107	246	155	494	-	995	7,662	1,578	11,239	2,427	8,812	-	-	1,559	-	-	-	134,280	297	-
Period 2b Period-Dependent Costs																					
2b.4.1	Decon supplies	373	-	-	-	-	-	-	93	466	466	-	-	-	-	-	-	-	-	-	-
2b.4.2	Insurance	-	-	-	-	-	-	612	61	674	674	-	-	-	-	-	-	-	-	-	-
2b.4.3	Property taxes	-	-	-	-	-	-	1,828	183	2,011	2,011	-	-	-	-	-	-	-	-	-	-
2b.4.4	Health physics supplies	-	1,874	-	-	-	-	-	468	2,342	2,342	-	-	-	-	-	-	-	-	-	-
2b.4.5	Heavy equipment rental	-	2,462	-	-	-	-	-	369	2,831	2,831	-	-	-	-	-	-	-	-	-	-
2b.4.6	Disposal of DAW generated	-	-	75	24	-	283	-	82	464	464	-	-	-	3,601	-	-	-	72,026	117	-
2b.4.7	Plant energy budget	-	-	-	-	-	-	2,839	426	3,265	3,265	-	-	-	-	-	-	-	-	-	-
2b.4.8	NRC Fees	-	-	-	-	-	-	767	77	844	844	-	-	-	-	-	-	-	-	-	-
2b.4.9	Emergency Planning Fees	-	-	-	-	-	-	1,454	145	1,600	-	1,600	-	-	-	-	-	-	-	-	-
2b.4.10	Fixed Overhead	-	-	-	-	-	-	1,501	225	1,726	1,726	-	-	-	-	-	-	-	-	-	-
2b.4.11	Spent Fuel Pool O&M	-	-	-	-	-	-	484	73	557	-	557	-	-	-	-	-	-	-	-	-
2b.4.12	Liquid Radwaste Processing Equipment/Services	-	-	-	-	-	-	245	37	282	282	-	-	-	-	-	-	-	-	-	-
2b.4.13	ISFSI Operating Costs	-	-	-	-	-	-	58	9	67	-	67	-	-	-	-	-	-	-	-	-
2b.4.14	Railroad Track Maintenance	-	-	-	-	-	-	65	10	75	-	-	75	-	-	-	-	-	-	-	-
2b.4.15	Security Staff Cost	-	-	-	-	-	-	452	68	520	520	-	-	-	-	-	-	-	-	-	14,049
2b.4.16	DOC Staff Cost	-	-	-	-	-	-	9,515	1,427	10,943	10,943	-	-	-	-	-	-	-	-	-	137,931
2b.4.17	Utility Staff Cost	-	-	-	-	-	-	12,873	1,931	14,804	14,804	-	-	-	-	-	-	-	-	-	256,706
2b.4	Subtotal Period 2b Period-Dependent Costs	373	4,336	75	24	-	283	32,695	5,684	43,470	41,171	2,224	75	-	3,601	-	-	-	72,026	117	408,686
2b.0	TOTAL PERIOD 2b COST	2,991	18,840	749	2,081	6,994	14,996	41,601	17,003	105,256	91,646	11,036	2,574	85,829	73,824	-	-	-	7,823,135	290,816	408,686
PERIOD 2c - Spent fuel delay prior to SFP decon																					
Period 2c Direct Decommissioning Activities																					
Period 2c Collateral Costs																					
2c.3.1	Spent Fuel Capital and Transfer	-	-	-	-	-	-	78,568	11,785	90,353	-	90,353	-	-	-	-	-	-	-	-	-
2c.3	Subtotal Period 2c Collateral Costs	-	-	-	-	-	-	78,568	11,785	90,353	-	90,353	-	-	-	-	-	-	-	-	-
Period 2c Period-Dependent Costs																					
2c.4.1	Insurance	-	-	-	-	-	-	6,112	611	6,723	6,723	-	-	-	-	-	-	-	-	-	-
2c.4.2	Property taxes	-	-	-	-	-	-	13,611	1,361	14,972	14,972	-	-	-	-	-	-	-	-	-	-
2c.4.3	Health physics supplies	-	2,097	-	-	-	-	-	524	2,622	2,622	-	-	-	-	-	-	-	-	-	-
2c.4.4	Disposal of DAW generated	-	-	95	31	-	359	-	104	589	589	-	-	-	4,572	-	-	-	91,449	149	-
2c.4.5	Plant energy budget	-	-	-	-	-	-	7,557	1,134	8,690	8,690	-	-	-	-	-	-	-	-	-	-
2c.4.6	NRC Fees	-	-	-	-	-	-	3,537	354	3,891	3,891	-	-	-	-	-	-	-	-	-	-
2c.4.7	Emergency Planning Fees	-	-	-	-	-	-	14,516	1,452	15,968	-	15,968	-	-	-	-	-	-	-	-	-
2c.4.8	Fixed Overhead	-	-	-	-	-	-	14,984	2,248	17,231	17,231	-	-	-	-	-	-	-	-	-	-
2c.4.9	Spent Fuel Pool O&M	-	-	-	-	-	-	4,835	725	5,561	-	5,561	-	-	-	-	-	-	-	-	-
2c.4.10	Liquid Radwaste Processing Equipment/Services	-	-	-	-	-	-	245	37	282	282	-	-	-	-	-	-	-	-	-	-
2c.4.11	ISFSI Operating Costs	-	-	-	-	-	-	584	88	671	-	671	-	-	-	-	-	-	-	-	-
2c.4.12	Railroad Track Maintenance	-	-	-	-	-	-	652	98	750	-	-	750	-	-	-	-	-	-	-	-
2c.4.13	Utility Staff Cost	-	-	-	-	-	-	8,982	1,347	10,329	5,165	5,165	-	-	-	-	-	-	-	-	191,229
2c.4	Subtotal Period 2c Period-Dependent Costs	-	2,097	95	31	-	359	75,615	10,082	88,280	60,166	27,364	750	-	4,572	-	-	-	91,449	149	191,229
2c.0	TOTAL PERIOD 2c COST	-	2,097	95	31	-	359	154,183	21,867	178,633	60,166	117,717	750	-	4,572	-	-	-	91,449	149	191,229

Prairie Island Nuclear Nuclear Generating Plant
Decommissioning Cost Analysis

Table C-1
Prairie Island DECON Unit 1
DOE Pickup of Industry Spent Fuel Starting in 2025 Decommissioning Cost Estimate
(Thousands of 2014 Dollars)

Activity Index	Activity Description	Decon Cost	Removal Cost	Packaging Costs	Transport Costs	Off-Site Processing Costs	LLRW Disposal Costs	Other Costs	Total Contingency	Total Costs	NRC Lic. Term. Costs	Spent Fuel Management Costs	Site Restoration Costs	Processed Volume Cu. Feet	Burial Volumes				Burial / Processed Wt., Lbs.	Craft Manhours	Utility and Contractor Manhours
															Class A Cu. Feet	Class B Cu. Feet	Class C Cu. Feet	GTCC Cu. Feet			
PERIOD 3c - Fuel Storage Operations/Shipping																					
Period 3c Direct Decommissioning Activities																					
Period 3c Collateral Costs																					
3c.3.1	Spent Fuel Capital and Transfer	-	-	-	-	-	-	3,510	526	4,036	-	4,036	-	-	-	-	-	-	-	-	-
3c.3	Subtotal Period 3c Collateral Costs	-	-	-	-	-	-	3,510	526	4,036	-	4,036	-	-	-	-	-	-	-	-	-
Period 3c Period-Dependent Costs																					
3c.4.1	Insurance	-	-	-	-	-	-	2,877	288	3,165	-	3,165	-	-	-	-	-	-	-	-	-
3c.4.2	Property taxes	-	-	-	-	-	-	6,986	699	7,685	-	7,685	-	-	-	-	-	-	-	-	-
3c.4.3	Plant energy budget	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
3c.4.4	NRC ISFSI Fees	-	-	-	-	-	-	2,270	227	2,497	-	2,497	-	-	-	-	-	-	-	-	-
3c.4.5	Emergency Planning Fees	-	-	-	-	-	-	790	79	869	-	869	-	-	-	-	-	-	-	-	-
3c.4.6	Fixed Overhead	-	-	-	-	-	-	6,727	1,009	7,736	-	7,736	-	-	-	-	-	-	-	-	-
3c.4.7	ISFSI Operating Costs	-	-	-	-	-	-	597	90	686	-	686	-	-	-	-	-	-	-	-	-
3c.4.8	Railroad Track Maintenance	-	-	-	-	-	-	667	100	767	-	767	-	-	-	-	-	-	-	-	-
3c.4.9	Security Staff Cost	-	-	-	-	-	-	13,306	1,996	15,302	-	15,302	-	-	-	-	-	-	-	-	351,926
3c.4.10	Utility Staff Cost	-	-	-	-	-	-	4,644	697	5,341	-	5,341	-	-	-	-	-	-	-	-	88,112
3c.4	Subtotal Period 3c Period-Dependent Costs	-	-	-	-	-	-	38,864	5,183	44,048	-	44,048	-	-	-	-	-	-	-	-	440,037
3c.0	TOTAL PERIOD 3c COST	-	-	-	-	-	-	42,374	5,710	48,084	-	48,084	-	-	-	-	-	-	-	-	440,037
PERIOD 3d - GTCC shipping																					
Period 3d Direct Decommissioning Activities																					
Nuclear Steam Supply System Removal																					
3d.1.1.1	Vessel & Internals GTCC Disposal	-	-	1,170	-	-	8,337	-	1,543	11,050	11,050	-	-	-	-	-	-	3,746	839,261	-	-
3d.1.1	Totals	-	-	1,170	-	-	8,337	-	1,543	11,050	11,050	-	-	-	-	-	-	3,746	839,261	-	-
3d.1	Subtotal Period 3d Activity Costs	-	-	1,170	-	-	8,337	-	1,543	11,050	11,050	-	-	-	-	-	-	3,746	839,261	-	-
Period 3d Collateral Costs																					
3d.3	Subtotal Period 3d Collateral Costs	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Period 3d Period-Dependent Costs																					
3d.4.1	Insurance	-	-	-	-	-	-	9	1	10	-	10	-	-	-	-	-	-	-	-	-
3d.4.2	Property taxes	-	-	-	-	-	-	21	2	24	-	24	-	-	-	-	-	-	-	-	-
3d.4.3	Plant energy budget	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
3d.4.4	NRC ISFSI Fees	-	-	-	-	-	-	7	1	8	-	8	-	-	-	-	-	-	-	-	-
3d.4.5	Emergency Planning Fees	-	-	-	-	-	-	2	0	3	-	3	-	-	-	-	-	-	-	-	-
3d.4.6	Fixed Overhead	-	-	-	-	-	-	21	3	24	-	24	-	-	-	-	-	-	-	-	-
3d.4.7	ISFSI Operating Costs	-	-	-	-	-	-	2	0	2	-	2	-	-	-	-	-	-	-	-	-
3d.4.8	Railroad Track Maintenance	-	-	-	-	-	-	2	0	2	-	2	-	-	-	-	-	-	-	-	-
3d.4.9	Security Staff Cost	-	-	-	-	-	-	41	6	47	-	47	-	-	-	-	-	-	-	-	1,080
3d.4.10	Utility Staff Cost	-	-	-	-	-	-	14	2	16	-	16	-	-	-	-	-	-	-	-	270
3d.4	Subtotal Period 3d Period-Dependent Costs	-	-	-	-	-	-	119	16	135	-	135	-	-	-	-	-	-	-	-	1,350
3d.0	TOTAL PERIOD 3d COST	-	-	1,170	-	-	8,337	119	1,559	11,185	11,050	135	-	-	-	-	-	3,746	839,261	-	1,350
PERIOD 3e - ISFSI Decontamination																					
Period 3e Direct Decommissioning Activities																					
Period 3e Additional Costs																					
3e.2.1	Decommissioning of ISFSI	-	-	1	0	-	2	559	140	702	702	-	-	-	30	-	-	-	600	2,550	828
3e.2	Subtotal Period 3e Additional Costs	-	-	1	0	-	2	559	140	702	702	-	-	-	30	-	-	-	600	2,550	828
Period 3e Collateral Costs																					
3e.3	Subtotal Period 3e Collateral Costs	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-

Prairie Island Nuclear Nuclear Generating Plant
Decommissioning Cost Analysis

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Table C-1
Prairie Island DECON Unit 1
DOE Pickup of Industry Spent Fuel Starting in 2025 Decommissioning Cost Estimate
(Thousands of 2014 Dollars)

Activity Index	Activity Description	Decon Cost	Removal Cost	Packaging Costs	Transport Costs	Off-Site Processing Costs	LLRW Disposal Costs	Other Costs	Total Contingency	Total Costs	NRC Lic. Term. Costs	Spent Fuel Management Costs	Site Restoration Costs	Processed Volume Cu. Feet	Burial Volumes				Burial / Processed Wt., Lbs.	Craft Manhours	Utility and Contractor Manhours
															Class A Cu. Feet	Class B Cu. Feet	Class C Cu. Feet	GTCC Cu. Feet			
Period 3e Period-Dependent Costs																					
3e.4.1	Insurance	-	-	-	-	-	-	84	21	104	104	-	-	-	-	-	-	-	-	-	-
3e.4.2	Property taxes	-	-	-	-	-	-	185	46	232	232	-	-	-	-	-	-	-	-	-	-
3e.4.3	Plant energy budget	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
3e.4.4	Fixed Overhead	-	-	-	-	-	-	178	45	223	223	-	-	-	-	-	-	-	-	-	-
3e.4.5	Railroad Track Maintenance	-	-	-	-	-	-	18	4	22	-	-	22	-	-	-	-	-	-	-	-
3e.4.6	Security Staff Cost	-	-	-	-	-	-	65	16	81	81	-	-	-	-	-	-	-	-	-	2,510
3e.4.7	Utility Staff Cost	-	-	-	-	-	-	103	26	129	129	-	-	-	-	-	-	-	-	-	1,901
3e.4	Subtotal Period 3e Period-Dependent Costs	-	-	-	-	-	-	633	158	791	769	-	22	-	-	-	-	-	-	-	4,411
3e.0	TOTAL PERIOD 3e COST	-	-	1	0	-	2	1,192	299	1,494	1,471	-	22	-	30	-	-	-	600	2,550	5,239
PERIOD 3f - ISFSI Site Restoration																					
Period 3f Direct Decommissioning Activities																					
Period 3f Additional Costs																					
3f.2.1	Demolition and Site Restoration of ISFSI	-	248	-	-	-	-	28	41	317	-	-	317	-	-	-	-	-	-	1,327	80
3f.2	Subtotal Period 3f Additional Costs	-	248	-	-	-	-	28	41	317	-	-	317	-	-	-	-	-	-	1,327	80
Period 3f Collateral Costs																					
3f.3.1	Small tool allowance	-	2	-	-	-	-	-	0	2	-	-	2	-	-	-	-	-	-	-	-
3f.3	Subtotal Period 3f Collateral Costs	-	2	-	-	-	-	-	0	2	-	-	2	-	-	-	-	-	-	-	-
Period 3f Period-Dependent Costs																					
3f.4.1	Insurance	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
3f.4.2	Property taxes	-	-	-	-	-	-	93	9	103	-	-	103	-	-	-	-	-	-	-	-
3f.4.3	Heavy equipment rental	-	106	-	-	-	-	-	16	121	-	-	121	-	-	-	-	-	-	-	-
3f.4.4	Plant energy budget	-	-	-	-	-	-	52	8	59	-	-	59	-	-	-	-	-	-	-	-
3f.4.5	Fixed Overhead	-	-	-	-	-	-	90	13	103	-	-	103	-	-	-	-	-	-	-	-
3f.4.6	Railroad Track Maintenance	-	-	-	-	-	-	9	1	10	-	-	10	-	-	-	-	-	-	-	-
3f.4.7	Security Staff Cost	-	-	-	-	-	-	33	5	38	-	-	38	-	-	-	-	-	-	-	1,265
3f.4.8	Utility Staff Cost	-	-	-	-	-	-	41	6	47	-	-	47	-	-	-	-	-	-	-	784
3f.4	Subtotal Period 3f Period-Dependent Costs	-	106	-	-	-	-	317	59	481	-	-	481	-	-	-	-	-	-	-	2,050
3f.0	TOTAL PERIOD 3f COST	-	355	-	-	-	-	345	100	801	-	-	801	-	-	-	-	-	-	1,327	2,130
PERIOD 3 TOTALS		-	17,750	1,171	0	-	8,340	65,519	13,384	106,163	12,725	54,677	38,761	-	30	-	-	3,746	839,861	125,418	716,838
TOTAL COST TO DECOMMISSION		7,400	69,915	32,577	6,849	11,387	46,870	450,475	109,674	735,147	476,522	212,421	46,204	144,842	132,612	713	673	3,746	14,603,630	753,644	3,123,133

TOTAL COST TO DECOMMISSION WITH 17.53% CONTINGENCY:	\$735,147	thousands of 2014 dollars
TOTAL NRC LICENSE TERMINATION COST IS 64.82% OR:	\$476,522	thousands of 2014 dollars
SPENT FUEL MANAGEMENT COST IS 28.9% OR:	\$212,421	thousands of 2014 dollars
NON-NUCLEAR DEMOLITION COST IS 6.28% OR:	\$46,204	thousands of 2014 dollars
TOTAL RADWASTE VOLUME BURIED (EXCLUDING GTCC):	133,998	Cubic Feet
TOTAL GREATER THAN CLASS C RADWASTE VOLUME GENERATED:	3,746	Cubic Feet
TOTAL SCRAP METAL REMOVED:	27,780	Tons
TOTAL CRAFT LABOR REQUIREMENTS:	753,644	Man-hours

End Notes:
n/a - indicates that this activity not charged as decommissioning expense.
a - indicates that this activity performed by decommissioning staff.
0 - indicates that this value is less than 0.5 but is non-zero.
a cell containing " - " indicates a zero value

Prairie Island Nuclear Nuclear Generating Plant
Decommissioning Cost Analysis

Table C-2
Prairie Island DECON Unit 2
DOE Pickup of Industry Spent Fuel Starting in 2025 Decommissioning Cost Estimate
(Thousands of 2014 Dollars)

Activity Index	Activity Description	Decon Cost	Removal Cost	Packaging Costs	Transport Costs	Off-Site Processing Costs	LLRW Disposal Costs	Other Costs	Total Contingency	Total Costs	NRC Lic. Term. Costs	Spent Fuel Management Costs	Site Restoration Costs	Processed Volume Cu. Feet	Burial Volumes				Burial / Processed Wt., Lbs.	Craft Manhours	Utility and Contractor Manhours
															Class A Cu. Feet	Class B Cu. Feet	Class C Cu. Feet	GTCC Cu. Feet			
PERIOD 1a - Shutdown through Transition																					
Period 1a Direct Decommissioning Activities																					
1a.1.1	Prepare preliminary decommissioning cost	-	-	-	-	-	-	63	9	73	73	-	-	-	-	-	-	-	-	-	556
1a.1.2	Notification of Cessation of Operations									a											
1a.1.3	Remove fuel & source material									n/a											
1a.1.4	Notification of Permanent Defueling									a											
1a.1.5	Deactivate plant systems & process waste									a											
1a.1.6	Prepare and submit PSDAR	-	-	-	-	-	-	97	15	112	112	-	-	-	-	-	-	-	-	-	855
1a.1.7	Review plant dwgs & specs.	-	-	-	-	-	-	223	33	257	257	-	-	-	-	-	-	-	-	-	1,967
1a.1.8	Perform detailed rad survey									a											
1a.1.9	Estimate by-product inventory	-	-	-	-	-	-	49	7	56	56	-	-	-	-	-	-	-	-	-	428
1a.1.10	End product description	-	-	-	-	-	-	49	7	56	56	-	-	-	-	-	-	-	-	-	428
1a.1.11	Detailed by-product inventory	-	-	-	-	-	-	63	9	73	73	-	-	-	-	-	-	-	-	-	556
1a.1.12	Define major work sequence	-	-	-	-	-	-	364	55	419	419	-	-	-	-	-	-	-	-	-	3,207
1a.1.13	Perform SER and EA	-	-	-	-	-	-	150	23	173	173	-	-	-	-	-	-	-	-	-	1,326
1a.1.14	Perform Site-Specific Cost Study	-	-	-	-	-	-	243	36	279	279	-	-	-	-	-	-	-	-	-	2,138
1a.1.15	Prepare/submit License Termination Plan	-	-	-	-	-	-	199	30	229	229	-	-	-	-	-	-	-	-	-	1,751
1a.1.16	Receive NRC approval of termination plan									a											
Activity Specifications																					
1a.1.17.1	Plant & temporary facilities	-	-	-	-	-	-	239	36	275	247	-	27	-	-	-	-	-	-	-	2,104
1a.1.17.2	Plant systems	-	-	-	-	-	-	202	30	233	209	-	23	-	-	-	-	-	-	-	1,782
1a.1.17.3	NSSS Decontamination Flush	-	-	-	-	-	-	24	4	28	28	-	-	-	-	-	-	-	-	-	214
1a.1.17.4	Reactor internals	-	-	-	-	-	-	345	52	396	396	-	-	-	-	-	-	-	-	-	3,036
1a.1.17.5	Reactor vessel	-	-	-	-	-	-	316	47	363	363	-	-	-	-	-	-	-	-	-	2,779
1a.1.17.6	Biological shield	-	-	-	-	-	-	24	4	28	28	-	-	-	-	-	-	-	-	-	214
1a.1.17.7	Steam generators	-	-	-	-	-	-	151	23	174	174	-	-	-	-	-	-	-	-	-	1,334
1a.1.17.8	Reinforced concrete	-	-	-	-	-	-	78	12	89	45	-	45	-	-	-	-	-	-	-	684
1a.1.17.9	Main Turbine	-	-	-	-	-	-	19	3	22	-	-	22	-	-	-	-	-	-	-	171
1a.1.17.10	Main Condensers	-	-	-	-	-	-	19	3	22	-	-	22	-	-	-	-	-	-	-	171
1a.1.17.11	Plant structures & buildings	-	-	-	-	-	-	151	23	174	87	-	87	-	-	-	-	-	-	-	1,334
1a.1.17.12	Waste management	-	-	-	-	-	-	223	33	257	257	-	-	-	-	-	-	-	-	-	1,967
1a.1.17.13	Facility & site closeout	-	-	-	-	-	-	44	7	50	25	-	25	-	-	-	-	-	-	-	385
1a.1.17	Total	-	-	-	-	-	-	1,836	275	2,112	1,859	-	252	-	-	-	-	-	-	-	16,175
Planning & Site Preparations																					
1a.1.18	Prepare dismantling sequence	-	-	-	-	-	-	117	17	134	134	-	-	-	-	-	-	-	-	-	1,026
1a.1.19	Plant prep. & temp. svces	-	-	-	-	-	-	3,000	450	3,450	3,450	-	-	-	-	-	-	-	-	-	-
1a.1.20	Design water clean-up system	-	-	-	-	-	-	68	10	78	78	-	-	-	-	-	-	-	-	-	599
1a.1.21	Rigging/Cont. Cntrl Envlps/tooling/etc.	-	-	-	-	-	-	2,300	345	2,645	2,645	-	-	-	-	-	-	-	-	-	-
1a.1.22	Procure casks/liners & containers	-	-	-	-	-	-	60	9	69	69	-	-	-	-	-	-	-	-	-	526
1a.1	Subtotal Period 1a Activity Costs	-	-	-	-	-	-	8,880	1,332	10,212	9,960	-	252	-	-	-	-	-	-	-	31,537
Period 1a Additional Costs																					
1a.2.1	Spent Fuel Pool Isolation	-	-	-	-	-	-	7,208	1,081	8,290	8,290	-	-	-	-	-	-	-	-	-	-
1a.2	Subtotal Period 1a Additional Costs	-	-	-	-	-	-	7,208	1,081	8,290	8,290	-	-	-	-	-	-	-	-	-	-
Period 1a Collateral Costs																					
1a.3.1	Spent Fuel Capital and Transfer	-	-	-	-	-	-	15,674	2,351	18,025	-	18,025	-	-	-	-	-	-	-	-	-
1a.3	Subtotal Period 1a Collateral Costs	-	-	-	-	-	-	15,674	2,351	18,025	-	18,025	-	-	-	-	-	-	-	-	-
Period 1a Period-Dependent Costs																					
1a.4.1	Insurance	-	-	-	-	-	-	1,096	110	1,205	1,205	-	-	-	-	-	-	-	-	-	-
1a.4.2	Property taxes	-	-	-	-	-	-	1,580	158	1,738	1,738	-	-	-	-	-	-	-	-	-	-
1a.4.3	Health physics supplies	-	461	-	-	-	-	-	115	576	576	-	-	-	-	-	-	-	-	-	-
1a.4.4	Heavy equipment rental	-	528	-	-	-	-	-	79	608	608	-	-	-	-	-	-	-	-	-	-
1a.4.5	Disposal of DAW generated	-	-	12	4	-	44	-	13	73	73	-	-	-	565	-	-	-	11,299	18	-
1a.4.6	Plant energy budget	-	-	-	-	-	-	3,091	464	3,554	3,554	-	-	-	-	-	-	-	-	-	-
1a.4.7	NRC Fees	-	-	-	-	-	-	834	83	917	917	-	-	-	-	-	-	-	-	-	-
1a.4.8	Emergency Planning Fees	-	-	-	-	-	-	1,484	148	1,632	-	1,632	-	-	-	-	-	-	-	-	-
1a.4.9	Fixed Overhead	-	-	-	-	-	-	1,503	225	1,728	1,728	-	-	-	-	-	-	-	-	-	-
1a.4.10	Spent Fuel Pool O&M	-	-	-	-	-	-	396	59	455	-	455	-	-	-	-	-	-	-	-	-
1a.4.11	ISFSI Operating Costs	-	-	-	-	-	-	48	7	55	-	55	-	-	-	-	-	-	-	-	-
1a.4.12	Railroad Track Maintenance	-	-	-	-	-	-	53	8	61	-	-	61	-	-	-	-	-	-	-	-

Table C-2
Prairie Island DECON Unit 2
DOE Pickup of Industry Spent Fuel Starting in 2025 Decommissioning Cost Estimate
(Thousands of 2014 Dollars)

Activity Index	Activity Description	Decon Cost	Removal Cost	Packaging Costs	Transport Costs	Off-Site Processing Costs	LLRW Disposal Costs	Other Costs	Total Contingency	Total Costs	NRC Lic. Term. Costs	Spent Fuel Management Costs	Site Restoration Costs	Processed Volume Cu. Feet	Burial Volumes				Burial / Processed Wt., Lbs.	Craft Manhours	Utility and Contractor Manhours
															Class A Cu. Feet	Class B Cu. Feet	Class C Cu. Feet	GTCC Cu. Feet			
Period 1b Period-Dependent Costs (continued)																					
1b.4.16	Utility Staff Cost	-	-	-	-	-	-	8,653	1,298	9,950	9,950	-	-	-	-	-	-	-	-	-	174,537
1b.4	Subtotal Period 1b Period-Dependent Costs	27	628	7	2	-	26	21,139	3,200	25,028	23,918	1,080	31	-	327	-	-	-	6,541	11	301,234
1b.0	TOTAL PERIOD 1b COST	2,940	4,082	371	407	156	4,936	29,272	7,342	49,505	44,047	5,078	380	6,324	13,322	588	-	-	608,224	33,522	319,012
PERIOD 1 TOTALS		2,940	5,072	382	411	156	4,980	93,665	16,958	124,564	98,626	25,245	694	6,324	13,887	588	-	-	619,523	33,540	854,249
PERIOD 2a - Large Component Removal																					
Period 2a Direct Decommissioning Activities																					
Nuclear Steam Supply System Removal																					
2a.1.1.1	Reactor Coolant Piping	45	38	6	8	-	144	-	70	313	313	-	-	-	305	-	-	-	34,809	1,414	-
2a.1.1.2	Pressurizer Relief Tank	20	17	4	5	-	88	-	37	172	172	-	-	-	192	-	-	-	21,288	625	-
2a.1.1.3	Reactor Coolant Pumps & Motors	48	56	98	86	-	711	-	238	1,238	1,238	-	-	-	2,332	-	-	-	295,800	2,049	100
2a.1.1.4	Pressurizer	43	64	459	88	-	669	-	264	1,587	1,587	-	-	-	2,196	-	-	-	185,015	2,355	938
2a.1.1.5	Steam Generators	199	2,924	2,014	1,728	1,205	3,449	-	2,334	13,853	13,853	-	-	18,672	11,316	-	-	-	1,668,341	11,617	2,875
2a.1.1.6	CRDMs/ICIs/Service Structure Removal	253	238	210	48	-	736	-	398	1,884	1,884	-	-	-	4,797	-	-	-	177,400	8,104	-
2a.1.1.7	Reactor Vessel Internals	65	2,533	19,029	960	-	7,116	241	10,524	40,469	40,469	-	-	-	501	125	617	-	146,554	20,867	967
2a.1.1.8	Reactor Vessel	79	4,443	1,563	710	-	1,890	241	4,921	13,847	13,847	-	-	-	5,690	-	-	-	570,074	20,867	967
2a.1.1	Totals	752	10,312	23,385	3,632	1,205	14,804	483	18,787	73,360	73,360	-	-	18,672	27,330	125	617	-	3,099,281	67,896	5,846
Removal of Major Equipment																					
2a.1.2	Main Turbine/Generator	-	272	180	58	263	296	-	208	1,277	1,277	-	-	2,131	1,187	-	-	-	206,316	4,667	-
2a.1.3	Main Condensers	-	2,284	115	51	352	435	-	752	3,989	3,989	-	-	3,800	1,587	-	-	-	275,903	39,151	-
Cascading Costs from Clean Building Demolition																					
2a.1.4.1	Reactor	-	991	-	-	-	-	-	149	1,139	1,139	-	-	-	-	-	-	-	-	11,180	-
2a.1.4.2	Auxiliary	-	425	-	-	-	-	-	64	489	489	-	-	-	-	-	-	-	-	4,945	-
2a.1.4.3	Radwaste	-	15	-	-	-	-	-	2	18	18	-	-	-	-	-	-	-	-	179	-
2a.1.4	Totals	-	1,431	-	-	-	-	-	215	1,646	1,646	-	-	-	-	-	-	-	-	16,304	-
Disposal of Plant Systems																					
2a.1.5.1	Admin Bldg Ventilation	-	5	-	-	-	-	-	1	6	-	-	6	-	-	-	-	-	-	90	-
2a.1.5.2	Air Removal	-	23	-	-	-	-	-	3	27	-	-	27	-	-	-	-	-	-	422	-
2a.1.5.3	Auxiliary Feedwater	-	37	-	-	-	-	-	6	43	-	-	43	-	-	-	-	-	-	676	-
2a.1.5.4	Auxiliary Feedwater - RCA	-	30	0	1	15	-	-	10	56	56	-	-	178	-	-	-	-	7,214	486	-
2a.1.5.5	Bleed Steam	-	72	-	-	-	-	-	11	83	-	-	83	-	-	-	-	-	-	1,331	-
2a.1.5.6	Caustic Addition - RCA	-	32	0	1	20	-	-	11	65	65	-	-	240	-	-	-	-	9,761	468	-
2a.1.5.7	Chemical Feed	-	14	-	-	-	-	-	2	16	-	-	16	-	-	-	-	-	-	261	-
2a.1.5.8	Chemical Feed - RCA	-	2	0	0	1	-	-	1	4	4	-	-	16	-	-	-	-	634	31	-
2a.1.5.9	Circulating Water	-	22	-	-	-	-	-	3	25	-	-	25	-	-	-	-	-	-	401	-
2a.1.5.10	Condensate	-	424	-	-	-	-	-	64	487	-	-	487	-	-	-	-	-	-	7,537	-
2a.1.5.11	Condensate Polishing	-	167	-	-	-	-	-	25	192	-	-	192	-	-	-	-	-	-	2,987	-
2a.1.5.12	Condensate Polishing - RCA	-	31	1	3	40	-	-	14	89	89	-	-	483	-	-	-	-	19,616	493	-
2a.1.5.13	Electro-Hydraulic	-	8	-	-	-	-	-	1	9	-	-	9	-	-	-	-	-	-	143	-
2a.1.5.14	External Circulating Water	-	21	-	-	-	-	-	3	24	-	-	24	-	-	-	-	-	-	385	-
2a.1.5.15	External Circulating Water - RCA	-	58	1	4	60	-	-	24	149	149	-	-	721	-	-	-	-	29,284	938	-
2a.1.5.16	Feedwater	-	102	-	-	-	-	-	15	118	-	-	118	-	-	-	-	-	-	1,840	-
2a.1.5.17	Feedwater - RCA	-	200	6	26	347	-	-	106	685	685	-	-	4,147	-	-	-	-	168,414	3,377	-
2a.1.5.18	Gland Seal	-	27	-	-	-	-	-	4	31	-	-	31	-	-	-	-	-	-	504	-
2a.1.5.19	Heater Drain	-	308	-	-	-	-	-	46	355	-	-	355	-	-	-	-	-	-	5,638	-
2a.1.5.20	Hypobromous Acid Feed	-	5	-	-	-	-	-	1	5	-	-	5	-	-	-	-	-	-	86	-
2a.1.5.21	Hypobromous Acid Feed - RCA	-	1	0	0	0	-	-	0	1	1	-	-	2	-	-	-	-	100	12	-
2a.1.5.22	Internal Circ Water & CDSR	-	20	-	-	-	-	-	3	23	-	-	23	-	-	-	-	-	-	366	-
2a.1.5.23	Main Gen/Exciter/Transformer	-	0	-	-	-	-	-	0	0	-	-	0	-	-	-	-	-	-	5	-
2a.1.5.24	Main Steam	-	81	-	-	-	-	-	12	93	-	-	93	-	-	-	-	-	-	1,482	-
2a.1.5.25	Main Steam - RCA	-	306	8	32	432	-	-	147	926	926	-	-	5,166	-	-	-	-	209,799	5,146	-
2a.1.5.26	Repairable Spare Snubbers	-	5	0	0	1	-	-	1	7	7	-	-	12	-	-	-	-	490	82	-
2a.1.5.27	Steam Exclusion	-	2	-	-	-	-	-	0	2	-	-	2	-	-	-	-	-	-	32	-
2a.1.5.28	Steam Exclusion - RCA	-	3	0	0	2	-	-	1	7	7	-	-	24	-	-	-	-	966	47	-
2a.1.5.29	Steam Generator Blowdown	-	337	19	22	159	173	-	157	867	867	-	-	1,906	631	-	-	-	119,126	5,778	-
2a.1.5.30	Steam Generators	-	4	-	-	-	-	-	1	5	-	-	5	-	-	-	-	-	-	75	-
2a.1.5.31	Turbine & Moisture Separators	-	304	-	-	-	-	-	46	350	-	-	350	-	-	-	-	-	-	5,472	-
2a.1.5.32	Turbine Oil Purification	-	43	-	-	-	-	-	6	49	-	-	49	-	-	-	-	-	-	757	-
2a.1.5.33	Water Treatment	-	363	-	-	-	-	-	54	418	-	-	418	-	-	-	-	-	-	6,677	-
2a.1.5.34	Water Treatment - RCA	-	16	0	1	10	-	-	6	32	32	-	-	115	-	-	-	-	4,652	252	-
2a.1.5	Totals	-	3,075	36	91	1,088	173	-	787	5,250	2,889	-	2,361	13,010	631	-	-	-	570,056	54,280	-

Table C-2
Prairie Island DECON Unit 2
DOE Pickup of Industry Spent Fuel Starting in 2025 Decommissioning Cost Estimate
(Thousands of 2014 Dollars)

Activity Index	Activity Description	Decon Cost	Removal Cost	Packaging Costs	Transport Costs	Off-Site	LLRW	Other Costs	Total Contingency	Total Costs	NRC	Spent Fuel	Site	Processed Volume Cu. Feet	Burial Volumes				Burial /	Craft Manhours	Utility and
						Processing Costs	Disposal Costs				Lic. Term. Costs	Management Costs	Restoration Costs		Class A Cu. Feet	Class B Cu. Feet	Class C Cu. Feet	GTCC Cu. Feet	Processed Wt., Lbs.		Contractor Manhours
2a.1.6	Scaffolding in support of decommissioning	-	2,504	23	8	94	24	-	650	3,303	3,303	-	-	1,012	89	-	-	-	51,445	26,270	-
2a.1	Subtotal Period 2a Activity Costs	752	19,878	23,738	3,840	3,003	15,733	483	21,398	88,825	86,464	-	2,361	38,625	30,824	125	617	-	4,203,002	208,568	5,846
Period 2a Additional Costs																					
2a.2.1	Remedial Action Surveys	-	-	-	-	-	-	1,249	375	1,624	1,624	-	-	-	-	-	-	-	-	25,570	-
2a.2	Subtotal Period 2a Additional Costs	-	-	-	-	-	-	1,249	375	1,624	1,624	-	-	-	-	-	-	-	-	25,570	-
Period 2a Collateral Costs																					
2a.3.1	Process decommissioning water waste	49	-	32	82	-	140	-	75	378	378	-	-	-	314	-	-	-	18,829	61	-
2a.3.2	Process decommissioning chemical flush waste	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2a.3.3	Small tool allowance	-	219	-	-	-	-	-	33	252	227	-	25	-	-	-	-	-	-	-	-
2a.3.4	Spent Fuel Capital and Transfer	-	-	-	-	-	-	7,055	1,058	8,113	-	8,113	-	-	-	-	-	-	-	-	-
2a.3.5	On-site survey and release of 0.0 tons clean metallic waste	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2a.3	Subtotal Period 2a Collateral Costs	49	219	32	82	-	140	7,055	1,166	8,743	604	8,113	25	-	314	-	-	-	18,829	61	-
Period 2a Period-Dependent Costs																					
2a.4.1	Decon supplies	66	-	-	-	-	-	-	17	83	83	-	-	-	-	-	-	-	-	-	-
2a.4.2	Insurance	-	-	-	-	-	-	615	62	677	677	-	-	-	-	-	-	-	-	-	-
2a.4.3	Property taxes	-	-	-	-	-	-	1,839	184	2,023	1,821	-	202	-	-	-	-	-	-	-	-
2a.4.4	Health physics supplies	-	1,680	-	-	-	-	-	420	2,100	2,100	-	-	-	-	-	-	-	-	-	-
2a.4.5	Heavy equipment rental	-	2,498	-	-	-	-	-	375	2,873	2,873	-	-	-	-	-	-	-	-	-	-
2a.4.6	Disposal of DAW generated	-	-	85	28	-	323	-	94	530	530	-	-	-	4,113	-	-	-	82,265	134	-
2a.4.7	Plant energy budget	-	-	-	-	-	-	3,612	542	4,154	4,154	-	-	-	-	-	-	-	-	-	-
2a.4.8	NRC Fees	-	-	-	-	-	-	536	54	590	590	-	-	-	-	-	-	-	-	-	-
2a.4.9	Emergency Planning Fees	-	-	-	-	-	-	1,461	146	1,607	-	1,607	-	-	-	-	-	-	-	-	-
2a.4.10	Fixed Overhead	-	-	-	-	-	-	1,508	226	1,734	1,734	-	-	-	-	-	-	-	-	-	-
2a.4.11	Spent Fuel Pool O&M	-	-	-	-	-	-	487	73	560	-	560	-	-	-	-	-	-	-	-	-
2a.4.12	ISFSI Operating Costs	-	-	-	-	-	-	59	9	68	-	68	-	-	-	-	-	-	-	-	-
2a.4.13	Railroad Track Maintenance	-	-	-	-	-	-	264	40	304	-	-	304	-	-	-	-	-	-	-	-
2a.4.14	Security Staff Cost	-	-	-	-	-	-	5,611	842	6,452	6,452	-	-	-	-	-	-	-	-	-	162,281
2a.4.15	DOC Staff Cost	-	-	-	-	-	-	14,153	2,123	16,276	16,276	-	-	-	-	-	-	-	-	-	194,994
2a.4.16	Utility Staff Cost	-	-	-	-	-	-	19,180	2,877	22,057	22,057	-	-	-	-	-	-	-	-	-	363,049
2a.4	Subtotal Period 2a Period-Dependent Costs	66	4,178	85	28	-	323	49,325	8,081	62,086	59,346	2,234	506	-	4,113	-	-	-	82,265	134	720,324
2a.0	TOTAL PERIOD 2a COST	867	24,276	23,856	3,950	3,003	16,196	58,111	31,020	161,278	148,038	10,347	2,892	38,625	35,251	125	617	-	4,304,096	234,334	726,171
PERIOD 2b - Site Decontamination																					
Period 2b Direct Decommissioning Activities																					
Disposal of Plant Systems																					
2b.1.1.1	ADT & Misc Ventilation	-	20	0	1	13	2	-	8	45	45	-	-	153	9	-	-	-	6,814	363	-
2b.1.1.2	Aux Bldg Normal Ventilation	-	57	2	5	58	11	-	27	159	159	-	-	692	39	-	-	-	30,671	1,013	-
2b.1.1.3	Aux Bldg Special Ventilation	-	11	0	1	6	2	-	4	24	24	-	-	70	6	-	-	-	3,243	197	-
2b.1.1.4	Battery Rm Special Ventilation	-	1	-	-	-	-	-	0	2	-	-	2	-	-	-	-	-	-	24	-
2b.1.1.5	Boron Recycle	0	3	0	0	0	2	-	2	8	8	-	-	3	9	-	-	-	709	50	-
2b.1.1.6	Chemical & Volume Control	624	762	57	45	197	540	-	679	2,903	2,903	-	-	2,356	1,977	-	-	-	225,854	23,197	-
2b.1.1.7	Cold Chemical Lab Ventilation	-	1	-	-	-	-	-	0	1	-	-	1	-	-	-	-	-	-	9	-
2b.1.1.8	Component Cooling - RCA	-	521	19	75	1,004	-	-	294	1,912	1,912	-	-	11,996	-	-	-	-	487,169	8,583	-
2b.1.1.9	Containment Cooling	-	28	-	-	-	-	-	4	32	-	-	32	-	-	-	-	-	-	502	-
2b.1.1.10	Containment Cooling - RCA	-	242	4	17	229	-	-	98	591	591	-	-	2,743	-	-	-	-	111,390	3,949	-
2b.1.1.11	Containment Hydrogen Control - RCA	-	29	0	1	12	-	-	9	52	52	-	-	141	-	-	-	-	5,742	494	-
2b.1.1.12	Containment Spray - RCA	-	155	2	9	122	-	-	58	346	346	-	-	1,453	-	-	-	-	59,019	2,617	-
2b.1.1.13	Containment Ventilation	-	191	22	40	395	198	-	165	1,011	1,011	-	-	4,721	722	-	-	-	239,450	3,375	-
2b.1.1.14	Control/Relay/Cmptr Rm Vent	-	26	1	2	22	6	-	11	67	67	-	-	260	20	-	-	-	11,915	454	-
2b.1.1.15	Cooling Water	-	128	-	-	-	-	-	19	147	-	-	147	-	-	-	-	-	-	2,344	-
2b.1.1.16	Cooling Water - RCA	-	385	13	52	706	-	-	211	1,368	1,368	-	-	8,442	-	-	-	-	342,822	6,311	-
2b.1.1.17	Cranes/Hoists/Elevators - RCA	-	3	0	1	9	-	-	2	14	14	-	-	103	-	-	-	-	4,184	48	-
2b.1.1.18	D3 Emergency Diesel	-	8	-	-	-	-	-	1	9	-	-	9	-	-	-	-	-	-	141	-
2b.1.1.19	D4 Emergency Diesel	-	8	-	-	-	-	-	1	9	-	-	9	-	-	-	-	-	-	141	-
2b.1.1.20	D5 Emergency Diesel	-	0	-	-	-	-	-	0	0	-	-	0	-	-	-	-	-	-	5	-
2b.1.1.21	Electrical - Clean	-	1,389	-	-	-	-	-	208	1,597	-	-	1,597	-	-	-	-	-	-	24,276	-
2b.1.1.22	Electrical - Contaminated	-	380	4	14	167	21	-	128	714	714	-	-	1,997	75	-	-	-	86,080	6,503	-
2b.1.1.23	Electrical - Decontaminated	-	2,332	29	117	1,569	-	-	839	4,885	4,885	-	-	18,753	-	-	-	-	761,569	38,423	-
2b.1.1.24	Filter Rm Ventilation	-	4	0	0	2	0	-	1	8	8	-	-	24	1	-	-	-	1,020	69	-
2b.1.1.25	Fire Protection & Detection	-	164	-	-	-	-	-	25	188	-	-	188	-	-	-	-	-	-	3,009	-
2b.1.1.26	Fire Protection & Detection - RCA	-	197	3	11	153	-	-	74	438	438	-	-	1,828	-	-	-	-	74,245	3,134	-
2b.1.1.27	Fuel Handling	-	61	1	2	17	14	-	21	116	116	-	-	200	49	-	-	-	11,396	1,101	-

Table C-2
Prairie Island DECON Unit 2
DOE Pickup of Industry Spent Fuel Starting in 2025 Decommissioning Cost Estimate
(Thousands of 2014 Dollars)

Activity Index	Activity Description	Decon Cost	Removal Cost	Packaging Costs	Transport Costs	Off-Site Processing Costs	LLRW Disposal Costs	Other Costs	Total Contingency	Total Costs	NRC Lic. Term. Costs	Spent Fuel Management Costs	Site Restoration Costs	Processed Volume Cu. Feet	Burial Volumes				Burial / Processed Wt., Lbs.	Craft Manhours	Utility and Contractor Manhours
															Class A Cu. Feet	Class B Cu. Feet	Class C Cu. Feet	GTCC Cu. Feet			
2d.1	Subtotal Period 2d Activity Costs	1,174	3,311	134	163	1,428	838	-	1,876	8,923	8,923	-	-	17,046	3,391	-	-	-	934,809	66,074	-
Period 2d Additional Costs																					
2d.2.1	License Termination Survey Planning	-	-	-	-	-	-	547	164	711	711	-	-	-	-	-	-	-	-	-	6,240
2d.2.2	Remedial Action Surveys	-	-	-	-	-	-	793	238	1,031	1,031	-	-	-	-	-	-	-	-	16,230	-
2d.2	Subtotal Period 2d Additional Costs	-	-	-	-	-	-	1,339	402	1,741	1,741	-	-	-	-	-	-	-	-	16,230	6,240
Period 2d Collateral Costs																					
2d.3.1	Process decommissioning water waste	15	-	12	30	-	52	-	26	135	135	-	-	-	117	-	-	-	6,990	23	-
2d.3.2	Process decommissioning chemical flush waste	0	-	1	5	-	11	-	4	20	20	-	-	-	13	-	-	-	1,422	2	-
2d.3.3	Small tool allowance	-	67	-	-	-	-	-	10	77	77	-	-	-	-	-	-	-	-	-	-
2d.3.4	Decommissioning Equipment Disposition	-	-	137	59	556	145	-	142	1,039	1,039	-	-	6,000	529	-	-	-	304,968	88	-
2d.3	Subtotal Period 2d Collateral Costs	15	67	150	94	556	207	-	182	1,271	1,271	-	-	6,000	659	-	-	-	313,381	113	-
Period 2d Period-Dependent Costs																					
2d.4.1	Decon supplies	168	-	-	-	-	-	-	42	211	211	-	-	-	-	-	-	-	-	-	-
2d.4.2	Insurance	-	-	-	-	-	-	390	39	429	429	-	-	-	-	-	-	-	-	-	-
2d.4.3	Property taxes	-	-	-	-	-	-	579	58	637	637	-	-	-	-	-	-	-	-	-	-
2d.4.4	Health physics supplies	-	707	-	-	-	-	-	177	884	884	-	-	-	-	-	-	-	-	-	-
2d.4.5	Heavy equipment rental	-	1,570	-	-	-	-	-	235	1,805	1,805	-	-	-	-	-	-	-	-	-	-
2d.4.6	Disposal of DAW generated	-	-	42	14	-	157	-	46	258	258	-	-	-	2,002	-	-	-	40,031	65	-
2d.4.7	Plant energy budget	-	-	-	-	-	-	965	145	1,110	1,110	-	-	-	-	-	-	-	-	-	-
2d.4.8	NRC Fees	-	-	-	-	-	-	285	29	314	314	-	-	-	-	-	-	-	-	-	-
2d.4.9	Emergency Planning Fees	-	-	-	-	-	-	927	93	1,020	-	1,020	-	-	-	-	-	-	-	-	-
2d.4.10	Fixed Overhead	-	-	-	-	-	-	957	144	1,101	1,101	-	-	-	-	-	-	-	-	-	-
2d.4.11	Liquid Radwaste Processing Equipment/Services	-	-	-	-	-	-	313	47	360	360	-	-	-	-	-	-	-	-	-	-
2d.4.12	ISFSI Operating Costs	-	-	-	-	-	-	37	6	43	-	43	-	-	-	-	-	-	-	-	-
2d.4.13	Railroad Track Maintenance	-	-	-	-	-	-	42	6	48	-	-	48	-	-	-	-	-	-	-	-
2d.4.14	Security Staff Cost	-	-	-	-	-	-	1,074	161	1,235	1,235	-	-	-	-	-	-	-	-	-	29,526
2d.4.15	DOC Staff Cost	-	-	-	-	-	-	5,091	764	5,855	5,855	-	-	-	-	-	-	-	-	-	70,436
2d.4.16	Utility Staff Cost	-	-	-	-	-	-	6,818	1,023	7,841	7,841	-	-	-	-	-	-	-	-	-	127,029
2d.4	Subtotal Period 2d Period-Dependent Costs	168	2,277	42	14	-	157	17,480	3,013	23,150	22,039	1,063	48	-	2,002	-	-	-	40,031	65	226,990
2d.0	TOTAL PERIOD 2d COST	1,357	5,654	325	270	1,985	1,203	18,819	5,472	35,085	33,974	1,063	48	23,046	6,052	-	-	-	1,288,221	82,483	233,230
PERIOD 2f - License Termination																					
Period 2f Direct Decommissioning Activities																					
2f.1.1	ORISE confirmatory survey	-	-	-	-	-	-	163	49	212	212	-	-	-	-	-	-	-	-	-	-
2f.1.2	Terminate license	-	-	-	-	-	-	-	a	-	-	-	-	-	-	-	-	-	-	-	-
2f.1	Subtotal Period 2f Activity Costs	-	-	-	-	-	-	163	49	212	212	-	-	-	-	-	-	-	-	-	-
Period 2f Additional Costs																					
2f.2.1	License Termination Survey	-	-	-	-	-	-	5,826	1,748	7,573	7,573	-	-	-	-	-	-	-	-	102,642	3,120
2f.2	Subtotal Period 2f Additional Costs	-	-	-	-	-	-	5,826	1,748	7,573	7,573	-	-	-	-	-	-	-	-	102,642	3,120
Period 2f Collateral Costs																					
2f.3.1	DOC staff relocation expenses	-	-	-	-	-	-	1,708	256	1,964	1,964	-	-	-	-	-	-	-	-	-	-
2f.3.2	Spent Fuel Capital and Transfer	-	-	-	-	-	-	207	31	238	-	238	-	-	-	-	-	-	-	-	-
2f.3	Subtotal Period 2f Collateral Costs	-	-	-	-	-	-	1,914	287	2,201	1,964	238	-	-	-	-	-	-	-	-	-
Period 2f Period-Dependent Costs																					
2f.4.1	Insurance	-	-	-	-	-	-	344	34	379	379	-	-	-	-	-	-	-	-	-	-
2f.4.2	Property taxes	-	-	-	-	-	-	526	53	578	578	-	-	-	-	-	-	-	-	-	-
2f.4.3	Health physics supplies	-	572	-	-	-	-	-	143	715	715	-	-	-	-	-	-	-	-	-	-
2f.4.4	Disposal of DAW generated	-	-	7	2	-	26	-	8	43	43	-	-	-	334	-	-	-	6,685	11	-
2f.4.5	Plant energy budget	-	-	-	-	-	-	462	69	532	532	-	-	-	-	-	-	-	-	-	-
2f.4.6	NRC Fees	-	-	-	-	-	-	300	30	330	330	-	-	-	-	-	-	-	-	-	-
2f.4.7	Emergency Planning Fees	-	-	-	-	-	-	47	5	52	-	52	-	-	-	-	-	-	-	-	-
2f.4.8	Fixed Overhead	-	-	-	-	-	-	917	138	1,054	1,054	-	-	-	-	-	-	-	-	-	-
2f.4.9	ISFSI Operating Costs	-	-	-	-	-	-	36	5	41	-	41	-	-	-	-	-	-	-	-	-
2f.4.10	Railroad Track Maintenance	-	-	-	-	-	-	40	6	46	-	-	46	-	-	-	-	-	-	-	-
2f.4.11	Security Staff Cost	-	-	-	-	-	-	1,010	151	1,161	1,161	-	-	-	-	-	-	-	-	-	27,690
2f.4.12	DOC Staff Cost	-	-	-	-	-	-	3,451	518	3,969	3,969	-	-	-	-	-	-	-	-	-	46,410
2f.4.13	Utility Staff Cost	-	-	-	-	-	-	3,345	502	3,847	3,847	-	-	-	-	-	-	-	-	-	59,670
2f.4	Subtotal Period 2f Period-Dependent Costs	-	572	7	2	-	26	10,478	1,661	12,747	12,608	93	46	-	334	-	-	-	6,685	11	133,770
2f.0	TOTAL PERIOD 2f COST	-	572	7	2	-	26	18,381	3,745	22,733	22,357	331	46	-	334	-	-	-	6,685	102,653	136,890

Prairie Island Nuclear Nuclear Generating Plant
Decommissioning Cost Analysis

Table C-2
Prairie Island DECON Unit 2
DOE Pickup of Industry Spent Fuel Starting in 2025 Decommissioning Cost Estimate
(Thousands of 2014 Dollars)

Activity Index	Activity Description	Decon Cost	Removal Cost	Packaging Costs	Transport Costs	Off-Site Processing Costs	LLRW Disposal Costs	Other Costs	Total Contingency	Total Costs	NRC Lic. Term. Costs	Spent Fuel Management Costs	Site Restoration Costs	Processed Volume Cu. Feet	Burial Volumes				Burial / Processed Wt., Lbs.	Craft Manhours	Utility and Contractor Manhours
															Class A Cu. Feet	Class B Cu. Feet	Class C Cu. Feet	GTCC Cu. Feet			
PERIOD 3c - Fuel Storage Operations/Shipping																					
Period 3c Direct Decommissioning Activities																					
Period 3c Collateral Costs																					
3c.3.1	Spent Fuel Capital and Transfer	-	-	-	-	-	-	3,510	526	4,036	-	4,036	-	-	-	-	-	-	-	-	-
3c.3	Subtotal Period 3c Collateral Costs	-	-	-	-	-	-	3,510	526	4,036	-	4,036	-	-	-	-	-	-	-	-	-
Period 3c Period-Dependent Costs																					
3c.4.1	Insurance	-	-	-	-	-	-	2,877	288	3,165	-	3,165	-	-	-	-	-	-	-	-	-
3c.4.2	Property taxes	-	-	-	-	-	-	6,986	699	7,685	-	7,685	-	-	-	-	-	-	-	-	-
3c.4.3	Plant energy budget	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
3c.4.4	NRC ISFSI Fees	-	-	-	-	-	-	2,270	227	2,497	-	2,497	-	-	-	-	-	-	-	-	-
3c.4.5	Emergency Planning Fees	-	-	-	-	-	-	790	79	869	-	869	-	-	-	-	-	-	-	-	-
3c.4.6	Fixed Overhead	-	-	-	-	-	-	6,727	1,009	7,736	-	7,736	-	-	-	-	-	-	-	-	-
3c.4.7	ISFSI Operating Costs	-	-	-	-	-	-	597	90	686	-	686	-	-	-	-	-	-	-	-	-
3c.4.8	Railroad Track Maintenance	-	-	-	-	-	-	667	100	767	-	767	-	-	-	-	-	-	-	-	-
3c.4.9	Security Staff Cost	-	-	-	-	-	-	13,306	1,996	15,302	-	15,302	-	-	-	-	-	-	-	-	351,926
3c.4.10	Utility Staff Cost	-	-	-	-	-	-	4,644	697	5,341	-	5,341	-	-	-	-	-	-	-	-	88,112
3c.4	Subtotal Period 3c Period-Dependent Costs	-	-	-	-	-	-	38,864	5,183	44,048	-	44,048	-	-	-	-	-	-	-	-	440,037
3c.0	TOTAL PERIOD 3c COST	-	-	-	-	-	-	42,374	5,710	48,084	-	48,084	-	-	-	-	-	-	-	-	440,037
PERIOD 3d - GTCC shipping																					
Period 3d Direct Decommissioning Activities																					
Nuclear Steam Supply System Removal																					
3d.1.1.1	Vessel & Internals GTCC Disposal	-	-	877	-	-	7,480	-	1,341	9,698	9,698	-	-	-	-	-	-	2,810	641,697	-	-
3d.1.1	Totals	-	-	877	-	-	7,480	-	1,341	9,698	9,698	-	-	-	-	-	-	2,810	641,697	-	-
3d.1	Subtotal Period 3d Activity Costs	-	-	877	-	-	7,480	-	1,341	9,698	9,698	-	-	-	-	-	-	2,810	641,697	-	-
Period 3d Collateral Costs																					
3d.3	Subtotal Period 3d Collateral Costs	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Period 3d Period-Dependent Costs																					
3d.4.1	Insurance	-	-	-	-	-	-	9	1	10	-	10	-	-	-	-	-	-	-	-	-
3d.4.2	Property taxes	-	-	-	-	-	-	21	2	24	-	24	-	-	-	-	-	-	-	-	-
3d.4.3	Plant energy budget	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
3d.4.4	NRC ISFSI Fees	-	-	-	-	-	-	7	1	8	-	8	-	-	-	-	-	-	-	-	-
3d.4.5	Emergency Planning Fees	-	-	-	-	-	-	2	0	3	-	3	-	-	-	-	-	-	-	-	-
3d.4.6	Fixed Overhead	-	-	-	-	-	-	21	3	24	-	24	-	-	-	-	-	-	-	-	-
3d.4.7	ISFSI Operating Costs	-	-	-	-	-	-	2	0	2	-	2	-	-	-	-	-	-	-	-	-
3d.4.8	Railroad Track Maintenance	-	-	-	-	-	-	2	0	2	-	2	-	-	-	-	-	-	-	-	-
3d.4.9	Security Staff Cost	-	-	-	-	-	-	41	6	47	-	47	-	-	-	-	-	-	-	-	1,080
3d.4.10	Utility Staff Cost	-	-	-	-	-	-	14	2	16	-	16	-	-	-	-	-	-	-	-	270
3d.4	Subtotal Period 3d Period-Dependent Costs	-	-	-	-	-	-	119	16	135	-	135	-	-	-	-	-	-	-	-	1,350
3d.0	TOTAL PERIOD 3d COST	-	-	877	-	-	7,480	119	1,357	9,834	9,698	135	-	-	-	-	-	2,810	641,697	-	1,350
PERIOD 3e - ISFSI Decontamination																					
Period 3e Direct Decommissioning Activities																					
Period 3e Additional Costs																					
3e.2.1	Decommissioning of ISFSI	-	-	1	0	-	2	559	140	702	702	-	-	-	30	-	-	-	600	2,550	828
3e.2	Subtotal Period 3e Additional Costs	-	-	1	0	-	2	559	140	702	702	-	-	-	30	-	-	-	600	2,550	828
Period 3e Collateral Costs																					
3e.3	Subtotal Period 3e Collateral Costs	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-

Prairie Island Nuclear Nuclear Generating Plant
Decommissioning Cost Analysis

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Table C-2
Prairie Island DECON Unit 2
DOE Pickup of Industry Spent Fuel Starting in 2025 Decommissioning Cost Estimate
(Thousands of 2014 Dollars)

Activity Index		Decon Cost	Removal Cost	Packaging Costs	Transport Costs	Off-Site Processing Costs	LLRW Disposal Costs	Other Costs	Total Contingency	Total Costs	NRC Lic. Term. Costs	Spent Fuel Management Costs	Site Restoration Costs	Processed Volume Cu. Feet	Burial Volumes				Burial / Processed Wt., Lbs.	Craft Manhours	Utility and Contractor Manhours
Activity Description															Class A Cu. Feet	Class B Cu. Feet	Class C Cu. Feet	GTCC Cu. Feet			
Period 3e Period-Dependent Costs																					
3e.4.1	Insurance	-	-	-	-	-	-	84	21	104	104	-	-	-	-	-	-	-	-	-	-
3e.4.2	Property taxes	-	-	-	-	-	-	185	46	232	232	-	-	-	-	-	-	-	-	-	-
3e.4.3	Plant energy budget	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
3e.4.4	Fixed Overhead	-	-	-	-	-	-	178	45	223	223	-	-	-	-	-	-	-	-	-	-
3e.4.5	Railroad Track Maintenance	-	-	-	-	-	-	18	4	22	-	-	22	-	-	-	-	-	-	-	-
3e.4.6	Security Staff Cost	-	-	-	-	-	-	65	16	81	81	-	-	-	-	-	-	-	-	-	2,510
3e.4.7	Utility Staff Cost	-	-	-	-	-	-	103	26	129	129	-	-	-	-	-	-	-	-	-	1,901
3e.4	Subtotal Period 3e Period-Dependent Costs	-	-	-	-	-	-	633	158	791	769	-	22	-	-	-	-	-	-	-	4,411
3e.0	TOTAL PERIOD 3e COST	-	-	1	0	-	2	1,192	299	1,494	1,471	-	22	-	30	-	-	-	600	2,550	5,239
PERIOD 3f - ISFSI Site Restoration																					
Period 3f Direct Decommissioning Activities																					
Period 3f Additional Costs																					
3f.2.1	Demolition and Site Restoration of ISFSI	-	248	-	-	-	-	28	41	317	-	-	317	-	-	-	-	-	-	1,327	80
3f.2	Subtotal Period 3f Additional Costs	-	248	-	-	-	-	28	41	317	-	-	317	-	-	-	-	-	-	1,327	80
Period 3f Collateral Costs																					
3f.3.1	Small tool allowance	-	2	-	-	-	-	-	0	2	-	-	2	-	-	-	-	-	-	-	-
3f.3	Subtotal Period 3f Collateral Costs	-	2	-	-	-	-	-	0	2	-	-	2	-	-	-	-	-	-	-	-
Period 3f Period-Dependent Costs																					
3f.4.1	Insurance	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
3f.4.2	Property taxes	-	-	-	-	-	-	93	9	103	-	-	103	-	-	-	-	-	-	-	-
3f.4.3	Plant energy budget	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
3f.4.4	Fixed Overhead	-	-	-	-	-	-	90	13	103	-	-	103	-	-	-	-	-	-	-	-
3f.4.5	Railroad Track Maintenance	-	-	-	-	-	-	9	1	10	-	-	10	-	-	-	-	-	-	-	-
3f.4.6	Security Staff Cost	-	-	-	-	-	-	33	5	38	-	-	38	-	-	-	-	-	-	-	1,265
3f.4.7	Utility Staff Cost	-	-	-	-	-	-	41	6	47	-	-	47	-	-	-	-	-	-	-	784
3f.4	Subtotal Period 3f Period-Dependent Costs	-	-	-	-	-	-	266	35	301	-	-	301	-	-	-	-	-	-	-	2,050
3f.0	TOTAL PERIOD 3f COST	-	250	-	-	-	-	293	77	620	-	-	620	-	-	-	-	-	-	1,327	2,130
PERIOD 3 TOTALS		-	26,998	878	0	-	7,482	65,369	14,548	115,276	11,257	54,677	49,342	-	30	-	-	2,810	642,297	219,008	715,945
TOTAL COST TO DECOMMISSION		11,409	90,042	26,578	7,213	13,462	47,770	539,589	128,268	864,331	552,040	255,739	56,552	169,551	145,338	713	617	2,810	16,185,020	1,086,709	5,607,055

TOTAL COST TO DECOMMISSION WITH 42.21% CONTINGENCY:	\$864,331	thousands of 2014 dollars
TOTAL NRC LICENSE TERMINATION COST IS 63.87% OR:	\$552,040	thousands of 2014 dollars
SPENT FUEL MANAGEMENT COST IS 29.59% OR:	\$255,739	thousands of 2014 dollars
NON-NUCLEAR DEMOLITION COST IS 6.54% OR:	\$56,552	thousands of 2014 dollars
TOTAL RADWASTE VOLUME BURIED (EXCLUDING GTCC):	146,668	Cubic Feet
TOTAL GREATER THAN CLASS C RADWASTE VOLUME GENERATED:	2,810	Cubic Feet
TOTAL SCRAP METAL REMOVED:	34,906	Tons
TOTAL CRAFT LABOR REQUIREMENTS:	1,086,709	Man-hours

End Notes:
n/a - indicates that this activity not charged as decommissioning expense.
a - indicates that this activity performed by decommissioning staff.
0 - indicates that this value is less than 0.5 but is non-zero.
a cell containing " - " indicates a zero value

APPENDIX D
DETAILED COST ANALYSIS
SCENARIO 2
DECON DECOMMISSIONING COST ESTIMATE
WITH 60 YEARS OF SPENT FUEL STORAGE

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Decommissioning Cost Analysis*

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Table D-1
Prairie Island DECON Unit 1
60 Years of Spent Fuel Storage Decommissioning Cost Estimate
(Thousands of 2014 Dollars)

Activity Index	Activity Description	Decon Cost	Removal Cost	Packaging Costs	Transport Costs	Off-Site Processing Costs	LLRW Disposal Costs	Other Costs	Total Contingency	Total Costs	NRC Lic. Term. Costs	Spent Fuel Management Costs	Site Restoration Costs	Processed Volume Cu. Feet	Burial Volumes				Burial / Processed Wt., Lbs.	Craft Manhours	Utility and Contractor Manhours
															Class A Cu. Feet	Class B Cu. Feet	Class C Cu. Feet	GTCC Cu. Feet			
PERIOD 1a - Shutdown through Transition																					
Period 1a Direct Decommissioning Activities																					
1a.1.1	Prepare preliminary decommissioning cost	-	-	-	-	-	-	148	22	170	170	-	-	-	-	-	-	-	-	-	1,300
1a.1.2	Notification of Cessation of Operations									a											
1a.1.3	Remove fuel & source material									n/a											
1a.1.4	Notification of Permanent Defueling									a											
1a.1.5	Deactivate plant systems & process waste									a											
1a.1.6	Prepare and submit PSDAR	-	-	-	-	-	-	227	34	261	261	-	-	-	-	-	-	-	-	-	2,000
1a.1.7	Review plant dwgs & specs.	-	-	-	-	-	-	522	78	601	601	-	-	-	-	-	-	-	-	-	4,600
1a.1.8	Perform detailed rad survey									a											
1a.1.9	Estimate by-product inventory	-	-	-	-	-	-	114	17	131	131	-	-	-	-	-	-	-	-	-	1,000
1a.1.10	End product description	-	-	-	-	-	-	114	17	131	131	-	-	-	-	-	-	-	-	-	1,000
1a.1.11	Detailed by-product inventory	-	-	-	-	-	-	148	22	170	170	-	-	-	-	-	-	-	-	-	1,300
1a.1.12	Define major work sequence	-	-	-	-	-	-	851	128	979	979	-	-	-	-	-	-	-	-	-	7,500
1a.1.13	Perform SER and EA	-	-	-	-	-	-	352	53	405	405	-	-	-	-	-	-	-	-	-	3,100
1a.1.14	Perform Site-Specific Cost Study	-	-	-	-	-	-	568	85	653	653	-	-	-	-	-	-	-	-	-	5,000
1a.1.15	Prepare/submit License Termination Plan	-	-	-	-	-	-	465	70	535	535	-	-	-	-	-	-	-	-	-	4,096
1a.1.16	Receive NRC approval of termination plan									a											
Activity Specifications																					
1a.1.17.1	Plant & temporary facilities	-	-	-	-	-	-	559	84	642	578	-	64	-	-	-	-	-	-	-	4,920
1a.1.17.2	Plant systems	-	-	-	-	-	-	473	71	544	490	-	54	-	-	-	-	-	-	-	4,167
1a.1.17.3	NSSS Decontamination Flush	-	-	-	-	-	-	57	9	65	65	-	-	-	-	-	-	-	-	-	500
1a.1.17.4	Reactor internals	-	-	-	-	-	-	806	121	927	927	-	-	-	-	-	-	-	-	-	7,100
1a.1.17.5	Reactor vessel	-	-	-	-	-	-	738	111	849	849	-	-	-	-	-	-	-	-	-	6,500
1a.1.17.6	Biological shield	-	-	-	-	-	-	57	9	65	65	-	-	-	-	-	-	-	-	-	500
1a.1.17.7	Steam generators	-	-	-	-	-	-	354	53	407	407	-	-	-	-	-	-	-	-	-	3,120
1a.1.17.8	Reinforced concrete	-	-	-	-	-	-	182	27	209	104	-	104	-	-	-	-	-	-	-	1,600
1a.1.17.9	Main Turbine	-	-	-	-	-	-	45	7	52	-	-	52	-	-	-	-	-	-	-	400
1a.1.17.10	Main Condensers	-	-	-	-	-	-	45	7	52	-	-	52	-	-	-	-	-	-	-	400
1a.1.17.11	Plant structures & buildings	-	-	-	-	-	-	354	53	407	204	-	204	-	-	-	-	-	-	-	3,120
1a.1.17.12	Waste management	-	-	-	-	-	-	522	78	601	601	-	-	-	-	-	-	-	-	-	4,600
1a.1.17.13	Facility & site closeout	-	-	-	-	-	-	102	15	118	59	-	59	-	-	-	-	-	-	-	900
1a.1.17	Total	-	-	-	-	-	-	4,294	644	4,939	4,349	-	590	-	-	-	-	-	-	-	37,827
Planning & Site Preparations																					
1a.1.18	Prepare dismantling sequence	-	-	-	-	-	-	272	41	313	313	-	-	-	-	-	-	-	-	-	2,400
1a.1.19	Plant prep. & temp. svces	-	-	-	-	-	-	3,000	450	3,450	3,450	-	-	-	-	-	-	-	-	-	-
1a.1.20	Design water clean-up system	-	-	-	-	-	-	159	24	183	183	-	-	-	-	-	-	-	-	-	1,400
1a.1.21	Rigging/Cont. Cntrl Envlp/s/tooling/etc.	-	-	-	-	-	-	2,300	345	2,645	2,645	-	-	-	-	-	-	-	-	-	-
1a.1.22	Procure casks/liners & containers	-	-	-	-	-	-	140	21	161	161	-	-	-	-	-	-	-	-	-	1,230
1a.1	Subtotal Period 1a Activity Costs	-	-	-	-	-	-	13,673	2,051	15,724	15,134	-	590	-	-	-	-	-	-	-	73,753
Period 1a Additional Costs																					
1a.2.1	Spent Fuel Pool Isolation	-	-	-	-	-	-	10,813	1,622	12,434	12,434	-	-	-	-	-	-	-	-	-	-
1a.2	Subtotal Period 1a Additional Costs	-	-	-	-	-	-	10,813	1,622	12,434	12,434	-	-	-	-	-	-	-	-	-	-
Period 1a Collateral Costs																					
1a.3	Subtotal Period 1a Collateral Costs	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Period 1a Period-Dependent Costs																					
1a.4.1	Insurance	-	-	-	-	-	-	1,096	110	1,205	1,205	-	-	-	-	-	-	-	-	-	-
1a.4.2	Property taxes	-	-	-	-	-	-	1,580	158	1,738	1,738	-	-	-	-	-	-	-	-	-	-
1a.4.3	Health physics supplies	-	490	-	-	-	-	-	123	613	613	-	-	-	-	-	-	-	-	-	-
1a.4.4	Heavy equipment rental	-	528	-	-	-	-	-	79	608	608	-	-	-	-	-	-	-	-	-	-
1a.4.5	Disposal of DAW generated	-	-	13	4	-	48	-	14	79	79	-	-	-	610	-	-	-	12,190	20	-
1a.4.6	Plant energy budget	-	-	-	-	-	-	3,091	464	3,554	3,554	-	-	-	-	-	-	-	-	-	-
1a.4.7	NRC Fees	-	-	-	-	-	-	1,181	118	1,299	1,299	-	-	-	-	-	-	-	-	-	-
1a.4.8	Emergency Planning Fees	-	-	-	-	-	-	1,484	148	1,632	-	1,632	-	-	-	-	-	-	-	-	-
1a.4.9	Fixed Overhead	-	-	-	-	-	-	1,503	225	1,728	1,728	-	-	-	-	-	-	-	-	-	-
1a.4.10	Spent Fuel Pool O&M	-	-	-	-	-	-	396	59	455	-	455	-	-	-	-	-	-	-	-	-
1a.4.11	ISFSI Operating Costs	-	-	-	-	-	-	48	7	55	-	55	-	-	-	-	-	-	-	-	-
1a.4.12	Railroad Track Maintenance	-	-	-	-	-	-	53	8	61	-	-	61	-	-	-	-	-	-	-	-
1a.4.13	Security Staff Cost	-	-	-	-	-	-	394	59	453	453	-	-	-	-	-	-	-	-	-	12,264
1a.4.14	Utility Staff Cost	-	-	-	-	-	-	21,482	3,222	24,705	24,705	-	-	-	-	-	-	-	-	-	423,400
1a.4	Subtotal Period 1a Period-Dependent Costs	-	1,018	13	4	-	48	32,307	4,795	38,185	35,981	2,142	61	-	610	-	-	-	12,190	20	435,664
1a.0	TOTAL PERIOD 1a COST	-	1,018	13	4	-	48	56,793	8,468	66,343	63,550	2,142	651	-	610	-	-	-	12,190	20	509,417

*Prairie Island Nuclear Nuclear Generating Plant
Decommissioning Cost Analysis*

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Table D-1
Prairie Island DECON Unit 1
60 Years of Spent Fuel Storage Decommissioning Cost Estimate
(Thousands of 2014 Dollars)

Activity Index	Activity Description	Decon Cost	Removal Cost	Packaging Costs	Transport Costs	Off-Site Processing Costs	LLRW Disposal Costs	Other Costs	Total Contingency	Total Costs	NRC Lic. Term. Costs	Spent Fuel Management Costs	Site Restoration Costs	Processed Volume Cu. Feet	Burial Volumes				Burial / Processed Wt., Lbs.	Craft Manhours	Utility and Contractor Manhours
															Class A Cu. Feet	Class B Cu. Feet	Class C Cu. Feet	GTCC Cu. Feet			
PERIOD 1b - Decommissioning Preparations																					
Period 1b Direct Decommissioning Activities																					
Detailed Work Procedures																					
1b.1.1.1	Plant systems	-	-	-	-	-	-	537	81	618	556	-	62	-	-	-	-	-	-	-	4,733
1b.1.1.2	NSSS Decontamination Flush	-	-	-	-	-	-	114	17	131	131	-	-	-	-	-	-	-	-	-	1,000
1b.1.1.3	Reactor internals	-	-	-	-	-	-	284	43	326	326	-	-	-	-	-	-	-	-	-	2,500
1b.1.1.4	Remaining buildings	-	-	-	-	-	-	153	23	176	44	-	132	-	-	-	-	-	-	-	1,350
1b.1.1.5	CRD cooling assembly	-	-	-	-	-	-	114	17	131	131	-	-	-	-	-	-	-	-	-	1,000
1b.1.1.6	CRD housings & ICI tubes	-	-	-	-	-	-	114	17	131	131	-	-	-	-	-	-	-	-	-	1,000
1b.1.1.7	Incore instrumentation	-	-	-	-	-	-	114	17	131	131	-	-	-	-	-	-	-	-	-	1,000
1b.1.1.8	Reactor vessel	-	-	-	-	-	-	412	62	474	474	-	-	-	-	-	-	-	-	-	3,630
1b.1.1.9	Facility closeout	-	-	-	-	-	-	136	20	157	78	-	78	-	-	-	-	-	-	-	1,200
1b.1.1.10	Missile shields	-	-	-	-	-	-	51	8	59	59	-	-	-	-	-	-	-	-	-	450
1b.1.1.11	Biological shield	-	-	-	-	-	-	136	20	157	157	-	-	-	-	-	-	-	-	-	1,200
1b.1.1.12	Steam generators	-	-	-	-	-	-	522	78	601	601	-	-	-	-	-	-	-	-	-	4,600
1b.1.1.13	Reinforced concrete	-	-	-	-	-	-	114	17	131	65	-	65	-	-	-	-	-	-	-	1,000
1b.1.1.14	Main Turbine	-	-	-	-	-	-	177	27	204	-	-	204	-	-	-	-	-	-	-	1,560
1b.1.1.15	Main Condensers	-	-	-	-	-	-	177	27	204	-	-	204	-	-	-	-	-	-	-	1,560
1b.1.1.16	Auxiliary building	-	-	-	-	-	-	310	46	356	321	-	36	-	-	-	-	-	-	-	2,730
1b.1.1.17	Reactor building	-	-	-	-	-	-	310	46	356	321	-	36	-	-	-	-	-	-	-	2,730
1b.1.1	Total	-	-	-	-	-	-	3,774	566	4,340	3,524	-	816	-	-	-	-	-	-	-	33,243
1b.1.2	Decon primary loop	506	-	-	-	-	-	-	253	760	760	-	-	-	-	-	-	-	-	1,067	-
1b.1	Subtotal Period 1b Activity Costs	506	-	-	-	-	-	3,774	819	5,100	4,284	-	816	-	-	-	-	-	-	1,067	33,243
Period 1b Additional Costs																					
1b.2.1	Site Characterization	-	-	-	-	-	-	3,122	937	4,059	4,059	-	-	-	-	-	-	-	-	21,020	8,332
1b.2.2	Mixed/Hazardous Waste	-	-	281	80	152	-	-	63	576	576	-	-	6,133	-	-	-	-	351,986	2,361	-
1b.2.3	Asbestos Abatement	-	2,324	2	73	-	1,312	-	920	4,632	4,632	-	-	-	12,843	-	-	-	166,959	20,907	-
1b.2	Subtotal Period 1b Additional Costs	-	2,324	283	153	152	1,312	3,122	1,920	9,267	9,267	-	-	6,133	12,843	-	-	-	518,945	44,288	8,332
Period 1b Collateral Costs																					
1b.3.1	Decon equipment	881	-	-	-	-	-	-	132	1,013	1,013	-	-	-	-	-	-	-	-	-	-
1b.3.2	DOC staff relocation expenses	-	-	-	-	-	-	1,708	256	1,964	1,964	-	-	-	-	-	-	-	-	-	-
1b.3.3	Process decommissioning water waste	24	-	16	40	-	68	-	36	183	183	-	-	-	152	-	-	-	9,121	30	-
1b.3.4	Process decommissioning chemical flush waste	1	-	58	212	-	3,530	-	921	4,722	4,722	-	-	-	-	588	-	-	62,689	110	-
1b.3.5	Small tool allowance	-	30	-	-	-	-	-	5	35	35	-	-	-	-	-	-	-	-	-	-
1b.3.6	Pipe cutting equipment	-	1,100	-	-	-	-	-	165	1,265	1,265	-	-	-	-	-	-	-	-	-	-
1b.3.7	Decon rig	1,500	-	-	-	-	-	-	225	1,725	1,725	-	-	-	-	-	-	-	-	-	-
1b.3.8	Spent Fuel Capital and Transfer	-	-	-	-	-	-	1,968	295	2,264	-	2,264	-	-	-	-	-	-	-	-	-
1b.3	Subtotal Period 1b Collateral Costs	2,406	1,130	73	252	-	3,598	3,676	2,035	13,170	10,907	2,264	-	-	152	588	-	-	71,810	140	-
Period 1b Period-Dependent Costs																					
1b.4.1	Decon supplies	27	-	-	-	-	-	-	7	34	34	-	-	-	-	-	-	-	-	-	-
1b.4.2	Insurance	-	-	-	-	-	-	552	55	608	608	-	-	-	-	-	-	-	-	-	-
1b.4.3	Property taxes	-	-	-	-	-	-	796	80	876	876	-	-	-	-	-	-	-	-	-	-
1b.4.4	Health physics supplies	-	383	-	-	-	-	-	96	478	478	-	-	-	-	-	-	-	-	-	-
1b.4.5	Heavy equipment rental	-	266	-	-	-	-	-	40	306	306	-	-	-	-	-	-	-	-	-	-
1b.4.6	Disposal of DAW generated	-	-	7	2	-	28	-	8	46	46	-	-	-	360	-	-	-	7,197	12	-
1b.4.7	Plant energy budget	-	-	-	-	-	-	3,116	467	3,584	3,584	-	-	-	-	-	-	-	-	-	-
1b.4.8	NRC Fees	-	-	-	-	-	-	348	35	383	383	-	-	-	-	-	-	-	-	-	-
1b.4.9	Emergency Planning Fees	-	-	-	-	-	-	748	75	823	-	823	-	-	-	-	-	-	-	-	-
1b.4.10	Fixed Overhead	-	-	-	-	-	-	757	114	871	871	-	-	-	-	-	-	-	-	-	-
1b.4.11	Spent Fuel Pool O&M	-	-	-	-	-	-	199	30	229	-	229	-	-	-	-	-	-	-	-	-
1b.4.12	ISFSI Operating Costs	-	-	-	-	-	-	24	4	28	-	28	-	-	-	-	-	-	-	-	-
1b.4.13	Railroad Track Maintenance	-	-	-	-	-	-	27	4	31	-	-	31	-	-	-	-	-	-	-	-
1b.4.14	Security Staff Cost	-	-	-	-	-	-	199	30	228	228	-	-	-	-	-	-	-	-	-	6,182
1b.4.15	DOC Staff Cost	-	-	-	-	-	-	4,781	717	5,498	5,498	-	-	-	-	-	-	-	-	-	64,137
1b.4.16	Utility Staff Cost	-	-	-	-	-	-	10,885	1,633	12,518	12,518	-	-	-	-	-	-	-	-	-	214,491
1b.4	Subtotal Period 1b Period-Dependent Costs	27	649	7	2	-	28	22,433	3,393	26,541	25,430	1,080	31	-	360	-	-	-	7,197	12	284,811
1b.0	TOTAL PERIOD 1b COST	2,940	4,103	364	407	152	4,938	33,006	8,168	54,078	49,887	3,343	847	6,133	13,355	588	-	-	597,952	45,506	326,386
PERIOD 1 TOTALS		2,940	5,122	377	411	152	4,986	89,798	16,635	120,421	113,437	5,485	1,498	6,133	13,964	588	-	-	610,142	45,526	835,803

Prairie Island Nuclear Nuclear Generating Plant
Decommissioning Cost Analysis

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Table D-1
Prairie Island DECON Unit 1
60 Years of Spent Fuel Storage Decommissioning Cost Estimate
(Thousands of 2014 Dollars)

Activity Index	Activity Description	Decon Cost	Removal Cost	Packaging Costs	Transport Costs	Off-Site Processing Costs	LLRW Disposal Costs	Other Costs	Total Contingency	Total Costs	NRC Lic. Term. Costs	Spent Fuel Management Costs	Site Restoration Costs	Processed Volume Cu. Feet	Burial Volumes				Burial / Processed Wt., Lbs.	Craft Manhours	Utility and Contractor Manhours
															Class A Cu. Feet	Class B Cu. Feet	Class C Cu. Feet	GTCC Cu. Feet			
PERIOD 2a - Large Component Removal																					
Period 2a Direct Decommissioning Activities																					
Nuclear Steam Supply System Removal																					
2a.1.1.1	Reactor Coolant Piping	45	38	6	8	-	144	-	70	313	313	-	-	-	305	-	-	-	34,809	1,414	-
2a.1.1.2	Pressurizer Relief Tank	20	17	4	5	-	88	-	37	172	172	-	-	-	192	-	-	-	21,288	625	-
2a.1.1.3	Reactor Coolant Pumps & Motors	48	56	98	86	-	711	-	238	1,238	1,238	-	-	-	2,332	-	-	-	295,800	2,049	100
2a.1.1.4	Pressurizer	43	64	459	88	-	669	-	264	1,587	1,587	-	-	-	2,196	-	-	-	185,015	2,355	938
2a.1.1.5	Steam Generators	199	2,924	2,014	1,728	1,205	3,449	-	2,334	13,853	13,853	-	-	18,672	11,316	-	-	-	1,668,341	11,617	2,875
2a.1.1.6	CRDMs/ICIs/Service Structure Removal	253	238	210	48	-	736	-	398	1,884	1,884	-	-	-	4,797	-	-	-	177,400	8,104	-
2a.1.1.7	Reactor Vessel Internals	69	2,629	24,947	1,032	-	7,677	255	12,378	48,987	48,987	-	-	-	501	125	673	-	164,922	22,200	1,020
2a.1.1.8	Reactor Vessel	79	4,539	1,669	710	-	1,890	255	5,022	14,163	14,163	-	-	-	5,690	-	-	-	570,074	22,200	1,020
2a.1.1	Totals	756	10,505	29,408	3,705	1,205	15,365	510	20,742	82,195	82,195	-	-	18,672	27,330	125	673	-	3,117,649	70,563	5,953
Removal of Major Equipment																					
2a.1.2	Main Turbine/Generator	-	272	180	58	263	296	-	208	1,277	1,277	-	-	2,131	1,187	-	-	-	206,316	4,667	-
2a.1.3	Main Condensers	-	2,284	115	51	352	435	-	752	3,989	3,989	-	-	3,800	1,587	-	-	-	275,903	39,151	-
Cascading Costs from Clean Building Demolition																					
2a.1.4.1	Reactor	-	991	-	-	-	-	-	149	1,140	1,140	-	-	-	-	-	-	-	-	11,181	-
2a.1.4	Totals	-	991	-	-	-	-	-	149	1,140	1,140	-	-	-	-	-	-	-	-	11,181	-
Disposal of Plant Systems																					
2a.1.5.1	Air Removal	-	25	-	-	-	-	-	4	29	-	-	29	-	-	-	-	-	-	452	-
2a.1.5.2	Auxiliary Feedwater	-	37	-	-	-	-	-	6	42	-	-	42	-	-	-	-	-	-	670	-
2a.1.5.3	Auxiliary Feedwater - RCA	-	37	0	1	18	-	-	12	69	69	-	-	215	-	-	-	-	8,722	601	-
2a.1.5.4	Bleed Steam	-	72	-	-	-	-	-	11	83	-	-	83	-	-	-	-	-	-	1,335	-
2a.1.5.5	Caustic Addition - RCA	-	30	0	1	19	-	-	11	63	63	-	-	233	-	-	-	-	9,453	444	-
2a.1.5.6	Chemical Feed	-	16	-	-	-	-	-	2	18	-	-	18	-	-	-	-	-	-	304	-
2a.1.5.7	Chemical Feed - RCA	-	1	0	0	1	-	-	0	2	2	-	-	6	-	-	-	-	243	12	-
2a.1.5.8	Circulating Water	-	34	-	-	-	-	-	5	39	-	-	39	-	-	-	-	-	-	619	-
2a.1.5.9	Condensate	-	382	-	-	-	-	-	57	440	-	-	440	-	-	-	-	-	-	6,837	-
2a.1.5.10	Condensate Polishing	-	189	-	-	-	-	-	28	218	-	-	218	-	-	-	-	-	-	3,420	-
2a.1.5.11	Condensate Polishing - RCA	-	148	3	13	174	-	-	65	403	403	-	-	2,078	-	-	-	-	84,395	2,329	-
2a.1.5.12	Electro-hydraulic	-	7	-	-	-	-	-	1	8	-	-	8	-	-	-	-	-	-	127	-
2a.1.5.13	Feedwater	-	123	-	-	-	-	-	18	141	-	-	141	-	-	-	-	-	-	2,215	-
2a.1.5.14	Feedwater - RCA	-	157	5	20	268	-	-	83	533	533	-	-	3,208	-	-	-	-	130,294	2,651	-
2a.1.5.15	Gland Seal	-	27	-	-	-	-	-	4	31	-	-	31	-	-	-	-	-	-	505	-
2a.1.5.16	Heater Drain	-	321	-	-	-	-	-	48	370	-	-	370	-	-	-	-	-	-	5,881	-
2a.1.5.17	Internal Circ Water & CDSR	-	21	-	-	-	-	-	3	25	-	-	25	-	-	-	-	-	-	389	-
2a.1.5.18	Main Gen/Exciter/Transformer	-	0	-	-	-	-	-	0	0	-	-	0	-	-	-	-	-	-	5	-
2a.1.5.19	Main Steam	-	93	-	-	-	-	-	14	107	-	-	107	-	-	-	-	-	-	1,690	-
2a.1.5.20	Main Steam - RCA	-	295	8	31	422	-	-	143	899	899	-	-	5,044	-	-	-	-	204,825	4,956	-
2a.1.5.21	Steam Generator Blowdown	-	387	20	23	170	188	-	175	963	963	-	-	2,031	686	-	-	-	127,773	6,667	-
2a.1.5.22	Steam Generators	-	4	-	-	-	-	-	1	5	-	-	5	-	-	-	-	-	-	75	-
2a.1.5.23	Turbine & Moisture Separators	-	312	-	-	-	-	-	47	358	-	-	358	-	-	-	-	-	-	5,609	-
2a.1.5.24	Turbine Oil Purification	-	57	-	-	-	-	-	8	65	-	-	65	-	-	-	-	-	-	1,003	-
2a.1.5	Totals	-	2,776	37	90	1,072	188	-	747	4,910	2,931	-	1,979	12,815	686	-	-	-	565,705	48,794	-
2a.1.6	Scaffolding in support of decommissioning	-	772	3	1	13	3	-	196	988	988	-	-	138	12	-	-	-	7,016	6,368	-
2a.1	Subtotal Period 2a Activity Costs	756	17,600	29,743	3,905	2,905	16,287	510	22,793	94,499	92,520	-	1,979	37,556	30,801	125	673	-	4,172,589	180,724	5,953
Period 2a Additional Costs																					
2a.2.1	Remedial Action Surveys	-	-	-	-	-	-	1,299	390	1,689	1,689	-	-	-	-	-	-	-	-	26,595	-
2a.2	Subtotal Period 2a Additional Costs	-	-	-	-	-	-	1,299	390	1,689	1,689	-	-	-	-	-	-	-	-	26,595	-
Period 2a Collateral Costs																					
2a.3.1	Process decommissioning water waste	47	-	31	79	-	135	-	72	365	365	-	-	-	303	-	-	-	18,203	59	-
2a.3.2	Process decommissioning chemical flush waste	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2a.3.3	Small tool allowance	-	195	-	-	-	-	-	29	224	202	-	22	-	-	-	-	-	-	-	-
2a.3.4	Spent Fuel Capital and Transfer	-	-	-	-	-	-	17,811	2,672	20,482	-	20,482	-	-	-	-	-	-	-	-	-
2a.3.5	On-site survey and release of 0.0 tons clean metallic waste	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2a.3	Subtotal Period 2a Collateral Costs	47	195	31	79	-	135	17,811	2,773	21,071	567	20,482	22	-	303	-	-	-	18,203	59	-

*Prairie Island Nuclear Nuclear Generating Plant
Decommissioning Cost Analysis*

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Table D-1
Prairie Island DECON Unit 1
60 Years of Spent Fuel Storage Decommissioning Cost Estimate
(Thousands of 2014 Dollars)

Activity Index	Activity Description	Decon Cost	Removal Cost	Packaging Costs	Transport Costs	Off-Site	LLRW	Other Costs	Total Contingency	Total Costs	NRC	Spent Fuel Management Costs	Site Restoration Costs	Processed Volume Cu. Feet	Burial Volumes				Burial / Processed Wt., Lbs.	Craft Manhours	Utility and
						Processing Costs	Disposal Costs				Lic. Term. Costs				Class A Cu. Feet	Class B Cu. Feet	Class C Cu. Feet	GTCC Cu. Feet			Contractor Manhours
Decontamination of Site Buildings																					
2b.1.3.1	Reactor	1,009	2,385	127	871	187	10,692	-	3,945	19,215	19,215	-	-	2,230	57,414	-	-	-	3,559,624	50,842	-
2b.1.3.2	Backwash Waste Receiving Tank	-	25	1	12	-	84	-	29	151	151	-	-	-	507	-	-	-	43,896	299	-
2b.1.3	Totals	1,009	2,409	128	883	187	10,776	-	3,974	19,365	19,365	-	-	2,230	57,921	-	-	-	3,603,520	51,140	-
2b.1	Subtotal Period 2b Activity Costs	2,511	14,258	511	1,532	6,692	13,718	-	9,317	48,539	46,040	-	2,498	79,974	68,664	-	-	-	7,470,455	264,930	-
Period 2b Additional Costs																					
2b.2.1	Remedial Action Surveys	-	-	-	-	-	-	1,243	373	1,616	1,616	-	-	-	-	-	-	-	-	25,456	-
2b.2.2	Operational Equipment	-	-	9	31	302	-	-	51	391	391	-	-	5,855	-	-	-	-	146,375	16	-
2b.2	Subtotal Period 2b Additional Costs	-	-	9	31	302	-	1,243	424	2,008	2,008	-	-	5,855	-	-	-	-	146,375	25,472	-
Period 2b Collateral Costs																					
2b.3.1	Process decommissioning water waste	105	-	70	179	-	304	-	162	821	821	-	-	-	684	-	-	-	41,028	133	-
2b.3.2	Process decommissioning chemical flush waste	2	-	86	315	-	691	-	230	1,324	1,324	-	-	-	875	-	-	-	93,252	164	-
2b.3.3	Small tool allowance	-	246	-	-	-	-	-	37	283	283	-	-	-	-	-	-	-	-	-	-
2b.3.4	Spent Fuel Capital and Transfer	-	-	-	-	-	-	9,202	1,380	10,583	-	10,583	-	-	-	-	-	-	-	-	-
2b.3.5	On-site survey and release of 0.0 tons clean metallic waste	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2b.3	Subtotal Period 2b Collateral Costs	107	246	155	494	-	995	9,202	1,809	13,010	2,427	10,583	-	-	1,559	-	-	-	134,280	297	-
Period 2b Period-Dependent Costs																					
2b.4.1	Decon supplies	373	-	-	-	-	-	-	93	466	466	-	-	-	-	-	-	-	-	-	-
2b.4.2	Insurance	-	-	-	-	-	-	612	61	674	674	-	-	-	-	-	-	-	-	-	-
2b.4.3	Property taxes	-	-	-	-	-	-	1,828	183	2,011	2,011	-	-	-	-	-	-	-	-	-	-
2b.4.4	Health physics supplies	-	1,874	-	-	-	-	-	468	2,342	2,342	-	-	-	-	-	-	-	-	-	-
2b.4.5	Heavy equipment rental	-	2,462	-	-	-	-	-	369	2,831	2,831	-	-	-	-	-	-	-	-	-	-
2b.4.6	Disposal of DAW generated	-	-	75	24	-	283	-	82	464	464	-	-	-	3,601	-	-	-	72,026	117	-
2b.4.7	Plant energy budget	-	-	-	-	-	-	2,839	426	3,265	3,265	-	-	-	-	-	-	-	-	-	-
2b.4.8	NRC Fees	-	-	-	-	-	-	767	77	844	844	-	-	-	-	-	-	-	-	-	-
2b.4.9	Emergency Planning Fees	-	-	-	-	-	-	1,454	145	1,600	-	1,600	-	-	-	-	-	-	-	-	-
2b.4.10	Fixed Overhead	-	-	-	-	-	-	1,501	225	1,726	1,726	-	-	-	-	-	-	-	-	-	-
2b.4.11	Spent Fuel Pool O&M	-	-	-	-	-	-	484	73	557	-	557	-	-	-	-	-	-	-	-	-
2b.4.12	Liquid Radwaste Processing Equipment/Services	-	-	-	-	-	-	245	37	282	282	-	-	-	-	-	-	-	-	-	-
2b.4.13	ISFSI Operating Costs	-	-	-	-	-	-	58	9	67	-	67	-	-	-	-	-	-	-	-	-
2b.4.14	Railroad Track Maintenance	-	-	-	-	-	-	65	10	75	-	-	75	-	-	-	-	-	-	-	-
2b.4.15	Security Staff Cost	-	-	-	-	-	-	452	68	520	520	-	-	-	-	-	-	-	-	-	14,049
2b.4.16	DOC Staff Cost	-	-	-	-	-	-	9,515	1,427	10,943	10,943	-	-	-	-	-	-	-	-	-	137,931
2b.4.17	Utility Staff Cost	-	-	-	-	-	-	12,873	1,931	14,804	14,804	-	-	-	-	-	-	-	-	-	256,706
2b.4	Subtotal Period 2b Period-Dependent Costs	373	4,336	75	24	-	283	32,695	5,684	43,470	41,171	2,224	75	-	3,601	-	-	-	72,026	117	408,686
2b.0	TOTAL PERIOD 2b COST	2,991	18,840	749	2,081	6,994	14,996	43,141	17,234	107,027	91,646	12,807	2,574	85,829	73,824	-	-	-	7,823,135	290,816	408,686
PERIOD 2c - Spent fuel delay prior to SFP decon																					
Period 2c Direct Decommissioning Activities																					
Period 2c Collateral Costs																					
2c.3.1	Spent Fuel Capital and Transfer	-	-	-	-	-	-	73,952	11,093	85,044	-	85,044	-	-	-	-	-	-	-	-	-
2c.3	Subtotal Period 2c Collateral Costs	-	-	-	-	-	-	73,952	11,093	85,044	-	85,044	-	-	-	-	-	-	-	-	-
Period 2c Period-Dependent Costs																					
2c.4.1	Insurance	-	-	-	-	-	-	6,112	611	6,723	6,723	-	-	-	-	-	-	-	-	-	-
2c.4.2	Property taxes	-	-	-	-	-	-	13,611	1,361	14,972	14,972	-	-	-	-	-	-	-	-	-	-
2c.4.3	Health physics supplies	-	2,097	-	-	-	-	-	524	2,622	2,622	-	-	-	-	-	-	-	-	-	-
2c.4.4	Disposal of DAW generated	-	-	95	31	-	359	-	104	589	589	-	-	-	4,572	-	-	-	91,449	149	-
2c.4.5	Plant energy budget	-	-	-	-	-	-	7,557	1,134	8,690	8,690	-	-	-	-	-	-	-	-	-	-
2c.4.6	NRC Fees	-	-	-	-	-	-	3,537	354	3,891	3,891	-	-	-	-	-	-	-	-	-	-
2c.4.7	Emergency Planning Fees	-	-	-	-	-	-	14,516	1,452	15,968	-	15,968	-	-	-	-	-	-	-	-	-
2c.4.8	Fixed Overhead	-	-	-	-	-	-	14,984	2,248	17,231	17,231	-	-	-	-	-	-	-	-	-	-
2c.4.9	Spent Fuel Pool O&M	-	-	-	-	-	-	4,835	725	5,561	-	5,561	-	-	-	-	-	-	-	-	-
2c.4.10	Liquid Radwaste Processing Equipment/Services	-	-	-	-	-	-	245	37	282	282	-	-	-	-	-	-	-	-	-	-
2c.4.11	ISFSI Operating Costs	-	-	-	-	-	-	584	88	671	-	671	-	-	-	-	-	-	-	-	-
2c.4.12	Railroad Track Maintenance	-	-	-	-	-	-	652	98	750	-	-	750	-	-	-	-	-	-	-	-
2c.4.13	Utility Staff Cost	-	-	-	-	-	-	8,982	1,347	10,329	5,165	5,165	-	-	-	-	-	-	-	-	191,229
2c.4	Subtotal Period 2c Period-Dependent Costs	-	2,097	95	31	-	359	75,615	10,082	88,280	60,166	27,364	750	-	4,572	-	-	-	91,449	149	191,229
2c.0	TOTAL PERIOD 2c COST	-	2,097	95	31	-	359	149,567	21,175	173,324	60,166	112,409	750	-	4,572	-	-	-	91,449	149	191,229

Prairie Island Nuclear Nuclear Generating Plant
Decommissioning Cost Analysis

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Table D-1
Prairie Island DECON Unit 1
60 Years of Spent Fuel Storage Decommissioning Cost Estimate
(Thousands of 2014 Dollars)

Activity Index	Activity Description	Decon Cost	Removal Cost	Packaging Costs	Transport Costs	Off-Site	LLRW	Other Costs	Total Contingency	Total Costs	NRC	Spent Fuel Management Costs	Site Restoration Costs	Processed Volume Cu. Feet	Burial Volumes				Burial / Processed Wt., Lbs.	Craft Manhours	Utility and
						Processing Costs	Disposal Costs				Lic. Term. Costs				Class A Cu. Feet	Class B Cu. Feet	Class C Cu. Feet	GTCC Cu. Feet			Contractor Manhours
PERIOD 2d - Decontamination Following Wet Fuel Storage																					
Period 2d Direct Decommissioning Activities																					
2d.1.1	Remove spent fuel racks	287	29	90	32	-	574	-	308	1,320	1,320	-	-	-	2,092	-	-	-	138,298	576	-
Disposal of Plant Systems																					
2d.1.2.1	Electrical - Contaminated - Fuel Pool	-	121	1	4	51	6	-	40	225	225	-	-	615	23	-	-	-	26,508	2,077	-
2d.1.2.2	Electrical - Decontaminated - Fuel Pool	-	747	9	37	493	-	-	267	1,553	1,553	-	-	5,893	-	-	-	-	239,327	12,340	-
2d.1.2.3	HVAC - Contaminated - Fuel Pool	-	135	3	9	117	14	-	57	336	336	-	-	1,398	53	-	-	-	60,246	2,157	-
2d.1.2.4	Safeguards Chilled Water - RCA	-	69	1	3	41	-	-	24	138	138	-	-	495	-	-	-	-	20,100	1,019	-
2d.1.2.5	Spent Fuel Pool Cooling	257	289	32	26	67	364	-	309	1,346	1,346	-	-	806	1,325	-	-	-	120,439	7,613	-
2d.1.2.6	Station & Instrument Air - RCA Fuel Pool	-	16	0	1	7	-	-	5	29	29	-	-	83	-	-	-	-	3,374	263	-
2d.1.2	Totals	257	1,378	47	79	777	385	-	703	3,627	3,627	-	-	9,290	1,401	-	-	-	469,994	25,468	-
Decontamination of Site Buildings																					
2d.1.3	Totals	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2d.1.4	Scaffolding in support of decommissioning	-	193	1	0	3	1	-	49	247	247	-	-	35	3	-	-	-	1,754	1,592	-
2d.1	Subtotal Period 2d Activity Costs	544	1,600	138	112	780	960	-	1,060	5,193	5,193	-	-	9,325	3,496	-	-	-	610,046	27,637	-
Period 2d Additional Costs																					
2d.2.1	License Termination Survey Planning	-	-	-	-	-	-	547	164	711	711	-	-	-	-	-	-	-	-	-	6,240
2d.2.2	Remedial Action Surveys	-	-	-	-	-	-	793	238	1,031	1,031	-	-	-	-	-	-	-	-	16,230	-
2d.2	Subtotal Period 2d Additional Costs	-	-	-	-	-	-	1,339	402	1,741	1,741	-	-	-	-	-	-	-	-	16,230	6,240
Period 2d Collateral Costs																					
2d.3.1	Process decommissioning water waste	10	-	8	22	-	37	-	18	96	96	-	-	-	83	-	-	-	4,994	16	-
2d.3.2	Process decommissioning chemical flush waste	1	-	32	117	-	256	-	85	491	491	-	-	-	324	-	-	-	34,576	61	-
2d.3.3	Small tool allowance	-	30	-	-	-	-	-	4	34	34	-	-	-	-	-	-	-	-	-	-
2d.3.4	Decommissioning Equipment Disposition	-	-	137	59	556	145	-	142	1,039	1,039	-	-	6,000	529	-	-	-	304,968	88	-
2d.3	Subtotal Period 2d Collateral Costs	11	30	177	197	556	438	-	250	1,660	1,660	-	-	6,000	937	-	-	-	344,538	165	-
Period 2d Period-Dependent Costs																					
2d.4.1	Decon supplies	42	-	-	-	-	-	-	10	52	52	-	-	-	-	-	-	-	-	-	-
2d.4.2	Insurance	-	-	-	-	-	-	390	39	429	429	-	-	-	-	-	-	-	-	-	-
2d.4.3	Property taxes	-	-	-	-	-	-	579	58	637	637	-	-	-	-	-	-	-	-	-	-
2d.4.4	Health physics supplies	-	533	-	-	-	-	-	133	666	666	-	-	-	-	-	-	-	-	-	-
2d.4.5	Heavy equipment rental	-	1,570	-	-	-	-	-	235	1,805	1,805	-	-	-	-	-	-	-	-	-	-
2d.4.6	Disposal of DAW generated	-	-	17	6	-	65	-	19	107	107	-	-	-	830	-	-	-	16,609	27	-
2d.4.7	Plant energy budget	-	-	-	-	-	965	-	145	1,110	1,110	-	-	-	-	-	-	-	-	-	-
2d.4.8	NRC Fees	-	-	-	-	-	416	-	42	457	457	-	-	-	-	-	-	-	-	-	-
2d.4.9	Emergency Planning Fees	-	-	-	-	-	927	-	93	1,020	-	1,020	-	-	-	-	-	-	-	-	-
2d.4.10	Fixed Overhead	-	-	-	-	-	957	-	144	1,101	1,101	-	-	-	-	-	-	-	-	-	-
2d.4.11	Liquid Radwaste Processing Equipment/Services	-	-	-	-	-	313	-	47	360	360	-	-	-	-	-	-	-	-	-	-
2d.4.12	ISFSI Operating Costs	-	-	-	-	-	37	-	6	43	-	43	-	-	-	-	-	-	-	-	-
2d.4.13	Railroad Track Maintenance	-	-	-	-	-	42	-	6	48	-	-	48	-	-	-	-	-	-	-	-
2d.4.14	Security Staff Cost	-	-	-	-	-	1,074	-	161	1,235	1,235	-	-	-	-	-	-	-	-	-	29,526
2d.4.15	DOC Staff Cost	-	-	-	-	-	5,091	-	764	5,855	5,855	-	-	-	-	-	-	-	-	-	70,436
2d.4.16	Utility Staff Cost	-	-	-	-	-	6,818	-	1,023	7,841	7,841	-	-	-	-	-	-	-	-	-	127,029
2d.4	Subtotal Period 2d Period-Dependent Costs	42	2,102	17	6	-	65	17,610	2,924	22,766	21,656	1,063	48	-	830	-	-	-	16,609	27	226,990
2d.0	TOTAL PERIOD 2d COST	597	3,732	332	315	1,337	1,463	18,949	4,636	31,360	30,250	1,063	48	15,325	5,263	-	-	-	971,193	44,059	233,230
PERIOD 2f - License Termination																					
Period 2f Direct Decommissioning Activities																					
2f.1.1	ORISE confirmatory survey	-	-	-	-	-	-	163	49	212	212	-	-	-	-	-	-	-	-	-	-
2f.1.2	Terminate license	-	-	-	-	-	-	-	-	a	-	-	-	-	-	-	-	-	-	-	-
2f.1	Subtotal Period 2f Activity Costs	-	-	-	-	-	-	163	49	212	212	-	-	-	-	-	-	-	-	-	-
Period 2f Additional Costs																					
2f.2.1	License Termination Survey	-	-	-	-	-	-	2,489	747	3,236	3,236	-	-	-	-	-	-	-	-	40,172	3,120
2f.2	Subtotal Period 2f Additional Costs	-	-	-	-	-	-	2,489	747	3,236	3,236	-	-	-	-	-	-	-	-	40,172	3,120
Period 2f Collateral Costs																					
2f.3.1	DOC staff relocation expenses	-	-	-	-	-	-	1,708	256	1,964	1,964	-	-	-	-	-	-	-	-	-	-
2f.3.2	Spent Fuel Capital and Transfer	-	-	-	-	-	-	103	16	119	-	119	-	-	-	-	-	-	-	-	-
2f.3	Subtotal Period 2f Collateral Costs	-	-	-	-	-	-	1,811	272	2,083	1,964	119	-	-	-	-	-	-	-	-	-

*Prairie Island Nuclear Nuclear Generating Plant
Decommissioning Cost Analysis*

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Appendix D, Page 8 of 20*

Table D-1
Prairie Island DECON Unit 1
60 Years of Spent Fuel Storage Decommissioning Cost Estimate
(Thousands of 2014 Dollars)

Activity Index	Activity Description	Decon Cost	Removal Cost	Packaging Costs	Transport Costs	Off-Site Processing Costs	LLRW Disposal Costs	Other Costs	Total Contingency	Total Costs	NRC Lic. Term. Costs	Spent Fuel Management Costs	Site Restoration Costs	Processed Volume Cu. Feet	Burial Volumes				Burial / Processed Wt., Lbs.	Craft Manhours	Utility and Contractor Manhours
															Class A Cu. Feet	Class B Cu. Feet	Class C Cu. Feet	GTCC Cu. Feet			
Period 2f Period-Dependent Costs																					
2f.4.1	Insurance	-	-	-	-	-	-	344	34	379	379	-	-	-	-	-	-	-	-	-	-
2f.4.2	Property taxes	-	-	-	-	-	-	526	53	578	578	-	-	-	-	-	-	-	-	-	-
2f.4.3	Health physics supplies	-	399	-	-	-	-	-	100	499	499	-	-	-	-	-	-	-	-	-	-
2f.4.4	Disposal of DAW generated	-	-	7	2	-	26	-	8	43	43	-	-	-	334	-	-	-	6,685	11	-
2f.4.5	Plant energy budget	-	-	-	-	-	-	462	69	532	532	-	-	-	-	-	-	-	-	-	-
2f.4.6	NRC Fees	-	-	-	-	-	-	452	45	497	497	-	-	-	-	-	-	-	-	-	-
2f.4.7	Emergency Planning Fees	-	-	-	-	-	-	47	5	52	-	52	-	-	-	-	-	-	-	-	-
2f.4.8	Fixed Overhead	-	-	-	-	-	-	917	138	1,054	1,054	-	-	-	-	-	-	-	-	-	-
2f.4.9	ISFSI Operating Costs	-	-	-	-	-	-	36	5	41	-	41	-	-	-	-	-	-	-	-	-
2f.4.10	Railroad Track Maintenance	-	-	-	-	-	-	40	6	46	-	-	46	-	-	-	-	-	-	-	-
2f.4.11	Security Staff Cost	-	-	-	-	-	-	1,010	151	1,161	1,161	-	-	-	-	-	-	-	-	-	27,690
2f.4.12	DOC Staff Cost	-	-	-	-	-	-	3,451	518	3,969	3,969	-	-	-	-	-	-	-	-	-	46,410
2f.4.13	Utility Staff Cost	-	-	-	-	-	-	3,345	502	3,847	3,847	-	-	-	-	-	-	-	-	-	59,670
2f.4	Subtotal Period 2f Period-Dependent Costs	-	399	7	2	-	26	10,630	1,633	12,698	12,559	93	46	-	334	-	-	-	6,685	11	133,770
2f.0	TOTAL PERIOD 2f COST	-	399	7	2	-	26	15,093	2,701	18,227	17,970	212	46	-	334	-	-	-	6,685	40,183	136,890
PERIOD 2 TOTALS		4,460	47,044	31,030	6,438	11,235	33,544	292,582	79,268	505,600	350,359	149,296	5,945	138,709	118,618	125	673	-	13,153,630	582,700	1,570,492
PERIOD 3b - Site Restoration																					
Period 3b Direct Decommissioning Activities																					
Demolition of Remaining Site Buildings																					
3b.1.1.1	Reactor	-	5,733	-	-	-	-	-	860	6,593	-	-	6,593	-	-	-	-	-	-	65,023	-
3b.1.1.2	Condensate Storage Tank Foundation	-	7	-	-	-	-	-	1	8	-	-	8	-	-	-	-	-	-	95	-
3b.1.1.3	Turbine	-	2,598	-	-	-	-	-	390	2,988	-	-	2,988	-	-	-	-	-	-	34,340	-
3b.1.1.4	Turbine Pedestal	-	818	-	-	-	-	-	123	941	-	-	941	-	-	-	-	-	-	7,580	-
3b.1.1	Totals	-	9,157	-	-	-	-	-	1,374	10,530	-	-	10,530	-	-	-	-	-	-	107,039	-
Site Closeout Activities																					
3b.1.2	Grade & landscape site	-	432	-	-	-	-	-	65	497	-	-	497	-	-	-	-	-	-	921	-
3b.1.3	Final report to NRC	-	-	-	-	-	-	177	27	204	204	-	-	-	-	-	-	-	-	-	1,560
3b.1	Subtotal Period 3b Activity Costs	-	9,589	-	-	-	-	177	1,465	11,231	204	-	11,027	-	-	-	-	-	-	107,959	1,560
Period 3b Additional Costs																					
3b.2.1	Concrete Crushing	-	231	-	-	-	-	3	35	268	-	-	268	-	-	-	-	-	-	1,096	-
3b.2.2	Underground Services Excavations	-	830	-	-	-	-	392	183	1,406	-	-	1,406	-	-	-	-	-	-	7,407	-
3b.2.3	Intake Structure cofferdam	-	572	-	-	-	-	-	86	657	-	-	657	-	-	-	-	-	-	5,079	-
3b.2	Subtotal Period 3b Additional Costs	-	1,633	-	-	-	-	395	304	2,332	-	-	2,332	-	-	-	-	-	-	13,582	-
Period 3b Collateral Costs																					
3b.3.1	Small tool allowance	-	117	-	-	-	-	-	17	134	-	-	134	-	-	-	-	-	-	-	-
3b.3.2	Spent Fuel Capital and Transfer	-	-	-	-	-	-	1,050	157	1,207	-	1,207	-	-	-	-	-	-	-	-	-
3b.3.3	Fixed Overhead - SR	-	-	-	-	-	-	1,141	171	1,313	-	-	1,313	-	-	-	-	-	-	-	-
3b.3	Subtotal Period 3b Collateral Costs	-	117	-	-	-	-	2,191	346	2,654	-	1,207	1,447	-	-	-	-	-	-	-	-
Period 3b Period-Dependent Costs																					
3b.4.1	Insurance	-	-	-	-	-	-	488	49	537	-	537	-	-	-	-	-	-	-	-	-
3b.4.2	Property taxes	-	-	-	-	-	-	1,315	131	1,446	0	1,301	145	-	-	-	-	-	-	-	-
3b.4.3	Heavy equipment rental	-	6,056	-	-	-	-	-	908	6,965	-	-	6,965	-	-	-	-	-	-	-	-
3b.4.4	Plant energy budget	-	-	-	-	-	-	655	98	754	-	-	754	-	-	-	-	-	-	-	-
3b.4.5	NRC ISFSI Fees	-	-	-	-	-	-	385	39	424	-	424	-	-	-	-	-	-	-	-	-
3b.4.6	Emergency Planning Fees	-	-	-	-	-	-	134	13	148	-	148	-	-	-	-	-	-	-	-	-
3b.4.7	ISFSI Operating Costs	-	-	-	-	-	-	101	15	116	-	116	-	-	-	-	-	-	-	-	-
3b.4.8	Railroad Track Maintenance	-	-	-	-	-	-	312	47	358	-	-	358	-	-	-	-	-	-	-	-
3b.4.9	Security Staff Cost	-	-	-	-	-	-	2,738	411	3,148	(0)	2,582	567	-	-	-	-	-	-	-	74,658
3b.4.10	DOC Staff Cost	-	-	-	-	-	-	8,847	1,327	10,174	-	-	10,174	-	-	-	-	-	-	-	117,206
3b.4.11	Utility Staff Cost	-	-	-	-	-	-	4,423	663	5,086	0	915	4,171	-	-	-	-	-	-	-	74,658
3b.4	Subtotal Period 3b Period-Dependent Costs	-	6,056	-	-	-	-	19,397	3,702	29,156	0	6,023	23,132	-	-	-	-	-	-	-	266,521
3b.0	TOTAL PERIOD 3b COST	-	17,394	-	-	-	-	22,160	5,817	45,372	204	7,230	37,938	-	-	-	-	-	-	121,542	268,081

Prairie Island Nuclear Nuclear Generating Plant
Decommissioning Cost Analysis

Table D-1
Prairie Island DECON Unit 1
60 Years of Spent Fuel Storage Decommissioning Cost Estimate
(Thousands of 2014 Dollars)

Activity Index	Activity Description	Decon Cost	Removal Cost	Packaging Costs	Transport Costs	Off-Site Processing Costs	LLRW Disposal Costs	Other Costs	Total Contingency	Total Costs	NRC Lic. Term. Costs	Spent Fuel Management Costs	Site Restoration Costs	Processed Volume Cu. Feet	Burial Volumes				Burial / Processed Wt., Lbs.	Craft Manhours	Utility and Contractor Manhours
															Class A Cu. Feet	Class B Cu. Feet	Class C Cu. Feet	GTCC Cu. Feet			
PERIOD 3c - Fuel Storage Operations/Shipping																					
Period 3c Direct Decommissioning Activities																					
Period 3c Collateral Costs																					
3c.3.1	Spent Fuel Capital and Transfer	-	-	-	-	-	-	14,245	2,137	16,382	-	16,382	-	-	-	-	-	-	-	-	-
3c.3	Subtotal Period 3c Collateral Costs	-	-	-	-	-	-	14,245	2,137	16,382	-	16,382	-	-	-	-	-	-	-	-	-
Period 3c Period-Dependent Costs																					
3c.4.1	Insurance	-	-	-	-	-	-	5,642	564	6,206	-	6,206	-	-	-	-	-	-	-	-	-
3c.4.2	Property taxes	-	-	-	-	-	-	13,698	1,370	15,068	-	15,068	-	-	-	-	-	-	-	-	-
3c.4.3	Plant energy budget	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
3c.4.4	NRC ISFSI Fees	-	-	-	-	-	-	4,451	445	4,896	-	4,896	-	-	-	-	-	-	-	-	-
3c.4.5	Emergency Planning Fees	-	-	-	-	-	-	1,550	155	1,705	-	1,705	-	-	-	-	-	-	-	-	-
3c.4.6	Fixed Overhead	-	-	-	-	-	-	13,190	1,978	15,168	-	15,168	-	-	-	-	-	-	-	-	-
3c.4.7	ISFSI Operating Costs	-	-	-	-	-	-	1,170	176	1,346	-	1,346	-	-	-	-	-	-	-	-	-
3c.4.8	Railroad Track Maintenance	-	-	-	-	-	-	1,307	196	1,503	-	1,503	-	-	-	-	-	-	-	-	-
3c.4.9	Security Staff Cost	-	-	-	-	-	-	26,090	3,913	30,003	-	30,003	-	-	-	-	-	-	-	-	690,043
3c.4.10	Utility Staff Cost	-	-	-	-	-	-	9,106	1,366	10,472	-	10,472	-	-	-	-	-	-	-	-	172,766
3c.4	Subtotal Period 3c Period-Dependent Costs	-	-	-	-	-	-	76,203	10,163	86,367	-	86,367	-	-	-	-	-	-	-	-	862,809
3c.0	TOTAL PERIOD 3c COST	-	-	-	-	-	-	90,449	12,300	102,749	-	102,749	-	-	-	-	-	-	-	-	862,809
PERIOD 3d - GTCC shipping																					
Period 3d Direct Decommissioning Activities																					
Nuclear Steam Supply System Removal																					
3d.1.1.1	Vessel & Internals GTCC Disposal	-	-	1,170	-	-	8,337	-	1,543	11,050	11,050	-	-	-	-	-	-	3,746	839,261	-	-
3d.1.1	Totals	-	-	1,170	-	-	8,337	-	1,543	11,050	11,050	-	-	-	-	-	-	3,746	839,261	-	-
3d.1	Subtotal Period 3d Activity Costs	-	-	1,170	-	-	8,337	-	1,543	11,050	11,050	-	-	-	-	-	-	3,746	839,261	-	-
Period 3d Collateral Costs																					
3d.3	Subtotal Period 3d Collateral Costs	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Period 3d Period-Dependent Costs																					
3d.4.1	Insurance	-	-	-	-	-	-	9	1	10	-	10	-	-	-	-	-	-	-	-	-
3d.4.2	Property taxes	-	-	-	-	-	-	21	2	24	-	24	-	-	-	-	-	-	-	-	-
3d.4.3	Plant energy budget	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
3d.4.4	NRC ISFSI Fees	-	-	-	-	-	-	7	1	8	-	8	-	-	-	-	-	-	-	-	-
3d.4.5	Emergency Planning Fees	-	-	-	-	-	-	2	0	3	-	3	-	-	-	-	-	-	-	-	-
3d.4.6	Fixed Overhead	-	-	-	-	-	-	21	3	24	-	24	-	-	-	-	-	-	-	-	-
3d.4.7	ISFSI Operating Costs	-	-	-	-	-	-	2	0	2	-	2	-	-	-	-	-	-	-	-	-
3d.4.8	Railroad Track Maintenance	-	-	-	-	-	-	2	0	2	-	2	-	-	-	-	-	-	-	-	-
3d.4.9	Security Staff Cost	-	-	-	-	-	-	41	6	47	-	47	-	-	-	-	-	-	-	-	1,080
3d.4.10	Utility Staff Cost	-	-	-	-	-	-	14	2	16	-	16	-	-	-	-	-	-	-	-	270
3d.4	Subtotal Period 3d Period-Dependent Costs	-	-	-	-	-	-	119	16	135	-	135	-	-	-	-	-	-	-	-	1,350
3d.0	TOTAL PERIOD 3d COST	-	-	1,170	-	-	8,337	119	1,559	11,185	11,050	135	-	-	-	-	-	3,746	839,261	-	1,350
PERIOD 3e - ISFSI Decontamination																					
Period 3e Direct Decommissioning Activities																					
Period 3e Additional Costs																					
3e.2.1	Decommissioning of ISFSI	-	-	1	0	-	2	559	140	702	702	-	-	-	30	-	-	-	600	2,550	828
3e.2	Subtotal Period 3e Additional Costs	-	-	1	0	-	2	559	140	702	702	-	-	-	30	-	-	-	600	2,550	828
Period 3e Collateral Costs																					
3e.3	Subtotal Period 3e Collateral Costs	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-

Prairie Island Nuclear Nuclear Generating Plant
Decommissioning Cost Analysis

Table D-1
Prairie Island DECON Unit 1
60 Years of Spent Fuel Storage Decommissioning Cost Estimate
(Thousands of 2014 Dollars)

Activity Index	Activity Description	Decon Cost	Removal Cost	Packaging Costs	Transport Costs	Off-Site Processing Costs	LLRW Disposal Costs	Other Costs	Total Contingency	Total Costs	NRC Lic. Term. Costs	Spent Fuel Management Costs	Site Restoration Costs	Processed Volume Cu. Feet	Burial Volumes				Burial / Processed Wt., Lbs.	Craft Manhours	Utility and Contractor Manhours
															Class A Cu. Feet	Class B Cu. Feet	Class C Cu. Feet	GTCC Cu. Feet			
Period 3e Period-Dependent Costs																					
3e.4.1	Insurance	-	-	-	-	-	-	84	21	104	104	-	-	-	-	-	-	-	-	-	-
3e.4.2	Property taxes	-	-	-	-	-	-	185	46	232	232	-	-	-	-	-	-	-	-	-	-
3e.4.3	Plant energy budget	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
3e.4.4	Fixed Overhead	-	-	-	-	-	-	178	45	223	223	-	-	-	-	-	-	-	-	-	-
3e.4.5	Railroad Track Maintenance	-	-	-	-	-	-	18	4	22	-	-	22	-	-	-	-	-	-	-	-
3e.4.6	Security Staff Cost	-	-	-	-	-	-	65	16	81	81	-	-	-	-	-	-	-	-	-	2,510
3e.4.7	Utility Staff Cost	-	-	-	-	-	-	103	26	129	129	-	-	-	-	-	-	-	-	-	1,901
3e.4	Subtotal Period 3e Period-Dependent Costs	-	-	-	-	-	-	633	158	791	769	-	22	-	-	-	-	-	-	-	4,411
3e.0	TOTAL PERIOD 3e COST	-	-	1	0	-	2	1,192	299	1,494	1,471	-	22	-	30	-	-	-	600	2,550	5,239
PERIOD 3f - ISFSI Site Restoration																					
Period 3f Direct Decommissioning Activities																					
Period 3f Additional Costs																					
3f.2.1	Demolition and Site Restoration of ISFSI	-	248	-	-	-	-	28	41	317	-	-	317	-	-	-	-	-	-	1,327	80
3f.2	Subtotal Period 3f Additional Costs	-	248	-	-	-	-	28	41	317	-	-	317	-	-	-	-	-	-	1,327	80
Period 3f Collateral Costs																					
3f.3.1	Small tool allowance	-	2	-	-	-	-	-	0	2	-	-	2	-	-	-	-	-	-	-	-
3f.3	Subtotal Period 3f Collateral Costs	-	2	-	-	-	-	-	0	2	-	-	2	-	-	-	-	-	-	-	-
Period 3f Period-Dependent Costs																					
3f.4.1	Insurance	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
3f.4.2	Property taxes	-	-	-	-	-	-	93	9	103	-	-	103	-	-	-	-	-	-	-	-
3f.4.3	Heavy equipment rental	-	106	-	-	-	-	-	16	121	-	-	121	-	-	-	-	-	-	-	-
3f.4.4	Plant energy budget	-	-	-	-	-	-	52	8	59	-	-	59	-	-	-	-	-	-	-	-
3f.4.5	Fixed Overhead	-	-	-	-	-	-	90	13	103	-	-	103	-	-	-	-	-	-	-	-
3f.4.6	Railroad Track Maintenance	-	-	-	-	-	-	9	1	10	-	-	10	-	-	-	-	-	-	-	-
3f.4.7	Security Staff Cost	-	-	-	-	-	-	33	5	38	-	-	38	-	-	-	-	-	-	-	1,265
3f.4.8	Utility Staff Cost	-	-	-	-	-	-	41	6	47	-	-	47	-	-	-	-	-	-	-	784
3f.4	Subtotal Period 3f Period-Dependent Costs	-	106	-	-	-	-	317	59	481	-	-	481	-	-	-	-	-	-	-	2,050
3f.0	TOTAL PERIOD 3f COST	-	355	-	-	-	-	345	100	801	-	-	801	-	-	-	-	-	-	1,327	2,130
PERIOD 3 TOTALS		-	17,750	1,171	0	-	8,340	114,265	20,075	161,600	12,725	110,114	38,761	-	30	-	-	3,746	839,861	125,418	1,139,610
TOTAL COST TO DECOMMISSION		7,400	69,915	32,577	6,849	11,387	46,870	496,645	115,978	787,621	476,522	264,896	46,204	144,842	132,612	713	673	3,746	14,603,630	753,644	3,545,904

TOTAL COST TO DECOMMISSION WITH 17.27% CONTINGENCY:	\$787,621	thousands of 2014 dollars
TOTAL NRC LICENSE TERMINATION COST IS 60.5% OR:	\$476,522	thousands of 2014 dollars
SPENT FUEL MANAGEMENT COST IS 33.63% OR:	\$264,896	thousands of 2014 dollars
NON-NUCLEAR DEMOLITION COST IS 5.87% OR:	\$46,204	thousands of 2014 dollars
TOTAL RADWASTE VOLUME BURIED (EXCLUDING GTCC):	133,998	Cubic Feet
TOTAL GREATER THAN CLASS C RADWASTE VOLUME GENERATED:	3,746	Cubic Feet
TOTAL SCRAP METAL REMOVED:	27,780	Tons
TOTAL CRAFT LABOR REQUIREMENTS:	753,644	Man-hours

End Notes:
n/a - indicates that this activity not charged as decommissioning expense.
a - indicates that this activity performed by decommissioning staff.
0 - indicates that this value is less than 0.5 but is non-zero.
a cell containing " - " indicates a zero value

Prairie Island Nuclear Nuclear Generating Plant
Decommissioning Cost Analysis

Table D-2
Prairie Island DECON Unit 2
60 Years of Spent Fuel Storage Decommissioning Cost Estimate
(Thousands of 2014 Dollars)

Activity Index	Activity Description	Decon Cost	Removal Cost	Packaging Costs	Transport Costs	Off-Site Processing Costs	LLRW Disposal Costs	Other Costs	Total Contingency	Total Costs	NRC Lic. Term. Costs	Spent Fuel Management Costs	Site Restoration Costs	Processed Volume Cu. Feet	Burial Volumes				Burial / Processed Wt., Lbs.	Craft Manhours	Utility and Contractor Manhours
															Class A Cu. Feet	Class B Cu. Feet	Class C Cu. Feet	GTCC Cu. Feet			
PERIOD 1a - Shutdown through Transition																					
Period 1a Direct Decommissioning Activities																					
1a.1.1	Prepare preliminary decommissioning cost	-	-	-	-	-	-	63	9	73	73	-	-	-	-	-	-	-	-	-	556
1a.1.2	Notification of Cessation of Operations									a											
1a.1.3	Remove fuel & source material									n/a											
1a.1.4	Notification of Permanent Defueling									a											
1a.1.5	Deactivate plant systems & process waste									a											
1a.1.6	Prepare and submit PSDAR	-	-	-	-	-	-	97	15	112	112	-	-	-	-	-	-	-	-	-	855
1a.1.7	Review plant dwgs & specs.	-	-	-	-	-	-	223	33	257	257	-	-	-	-	-	-	-	-	-	1,967
1a.1.8	Perform detailed rad survey									a											
1a.1.9	Estimate by-product inventory	-	-	-	-	-	-	49	7	56	56	-	-	-	-	-	-	-	-	-	428
1a.1.10	End product description	-	-	-	-	-	-	49	7	56	56	-	-	-	-	-	-	-	-	-	428
1a.1.11	Detailed by-product inventory	-	-	-	-	-	-	63	9	73	73	-	-	-	-	-	-	-	-	-	556
1a.1.12	Define major work sequence	-	-	-	-	-	-	364	55	419	419	-	-	-	-	-	-	-	-	-	3,207
1a.1.13	Perform SER and EA	-	-	-	-	-	-	150	23	173	173	-	-	-	-	-	-	-	-	-	1,326
1a.1.14	Perform Site-Specific Cost Study	-	-	-	-	-	-	243	36	279	279	-	-	-	-	-	-	-	-	-	2,138
1a.1.15	Prepare/submit License Termination Plan	-	-	-	-	-	-	199	30	229	229	-	-	-	-	-	-	-	-	-	1,751
1a.1.16	Receive NRC approval of termination plan									a											
Activity Specifications																					
1a.1.17.1	Plant & temporary facilities	-	-	-	-	-	-	239	36	275	247	-	27	-	-	-	-	-	-	-	2,104
1a.1.17.2	Plant systems	-	-	-	-	-	-	202	30	233	209	-	23	-	-	-	-	-	-	-	1,782
1a.1.17.3	NSSS Decontamination Flush	-	-	-	-	-	-	24	4	28	28	-	-	-	-	-	-	-	-	-	214
1a.1.17.4	Reactor internals	-	-	-	-	-	-	345	52	396	396	-	-	-	-	-	-	-	-	-	3,036
1a.1.17.5	Reactor vessel	-	-	-	-	-	-	316	47	363	363	-	-	-	-	-	-	-	-	-	2,779
1a.1.17.6	Biological shield	-	-	-	-	-	-	24	4	28	28	-	-	-	-	-	-	-	-	-	214
1a.1.17.7	Steam generators	-	-	-	-	-	-	151	23	174	174	-	-	-	-	-	-	-	-	-	1,334
1a.1.17.8	Reinforced concrete	-	-	-	-	-	-	78	12	89	45	-	45	-	-	-	-	-	-	-	684
1a.1.17.9	Main Turbine	-	-	-	-	-	-	19	3	22	-	-	22	-	-	-	-	-	-	-	171
1a.1.17.10	Main Condensers	-	-	-	-	-	-	19	3	22	-	-	22	-	-	-	-	-	-	-	171
1a.1.17.11	Plant structures & buildings	-	-	-	-	-	-	151	23	174	87	-	87	-	-	-	-	-	-	-	1,334
1a.1.17.12	Waste management	-	-	-	-	-	-	223	33	257	257	-	-	-	-	-	-	-	-	-	1,967
1a.1.17.13	Facility & site closeout	-	-	-	-	-	-	44	7	50	25	-	25	-	-	-	-	-	-	-	385
1a.1.17	Total	-	-	-	-	-	-	1,836	275	2,112	1,859	-	252	-	-	-	-	-	-	-	16,175
Planning & Site Preparations																					
1a.1.18	Prepare dismantling sequence	-	-	-	-	-	-	117	17	134	134	-	-	-	-	-	-	-	-	-	1,026
1a.1.19	Plant prep. & temp. svces	-	-	-	-	-	-	3,000	450	3,450	3,450	-	-	-	-	-	-	-	-	-	-
1a.1.20	Design water clean-up system	-	-	-	-	-	-	68	10	78	78	-	-	-	-	-	-	-	-	-	599
1a.1.21	Rigging/Cont. Cntrl Envlps/tooling/etc.	-	-	-	-	-	-	2,300	345	2,645	2,645	-	-	-	-	-	-	-	-	-	-
1a.1.22	Procure casks/liners & containers	-	-	-	-	-	-	60	9	69	69	-	-	-	-	-	-	-	-	-	526
1a.1	Subtotal Period 1a Activity Costs	-	-	-	-	-	-	8,880	1,332	10,212	9,960	-	252	-	-	-	-	-	-	-	31,537
Period 1a Additional Costs																					
1a.2.1	Spent Fuel Pool Isolation	-	-	-	-	-	-	7,208	1,081	8,290	8,290	-	-	-	-	-	-	-	-	-	-
1a.2	Subtotal Period 1a Additional Costs	-	-	-	-	-	-	7,208	1,081	8,290	8,290	-	-	-	-	-	-	-	-	-	-
Period 1a Collateral Costs																					
1a.3.1	Spent Fuel Capital and Transfer	-	-	-	-	-	-	15,192	2,279	17,471	-	17,471	-	-	-	-	-	-	-	-	-
1a.3	Subtotal Period 1a Collateral Costs	-	-	-	-	-	-	15,192	2,279	17,471	-	17,471	-	-	-	-	-	-	-	-	-
Period 1a Period-Dependent Costs																					
1a.4.1	Insurance	-	-	-	-	-	-	1,096	110	1,205	1,205	-	-	-	-	-	-	-	-	-	-
1a.4.2	Property taxes	-	-	-	-	-	-	1,580	158	1,738	1,738	-	-	-	-	-	-	-	-	-	-
1a.4.3	Health physics supplies	-	461	-	-	-	-	-	115	576	576	-	-	-	-	-	-	-	-	-	-
1a.4.4	Heavy equipment rental	-	528	-	-	-	-	-	79	608	608	-	-	-	-	-	-	-	-	-	-
1a.4.5	Disposal of DAW generated	-	-	12	4	-	44	-	13	73	73	-	-	-	565	-	-	-	11,299	18	-
1a.4.6	Plant energy budget	-	-	-	-	-	-	3,091	464	3,554	3,554	-	-	-	-	-	-	-	-	-	-
1a.4.7	NRC Fees	-	-	-	-	-	-	834	83	917	917	-	-	-	-	-	-	-	-	-	-
1a.4.8	Emergency Planning Fees	-	-	-	-	-	-	1,484	148	1,632	-	1,632	-	-	-	-	-	-	-	-	-
1a.4.9	Fixed Overhead	-	-	-	-	-	-	1,503	225	1,728	1,728	-	-	-	-	-	-	-	-	-	-
1a.4.10	Spent Fuel Pool O&M	-	-	-	-	-	-	396	59	455	-	455	-	-	-	-	-	-	-	-	-
1a.4.11	ISFSI Operating Costs	-	-	-	-	-	-	48	7	55	-	55	-	-	-	-	-	-	-	-	-
1a.4.12	Railroad Track Maintenance	-	-	-	-	-	-	53	8	61	-	-	61	-	-	-	-	-	-	-	-
1a.4.13	Security Staff Cost	-	-	-	-	-	-	5,383	807	6,190	6,190	-	-	-	-	-	-	-	-	-	157,471
1a.4.14	Utility Staff Cost	-	-	-	-	-	-	17,164	2,575	19,739	19,739	-	-	-	-	-	-	-	-	-	346,229
1a.4	Subtotal Period 1a Period-Dependent Costs	-	990	12	4	-	44	32,630	4,852	38,532	36,329	2,142	61	-	565	-	-	-	11,299	18	503,700

Prairie Island Nuclear Nuclear Generating Plant
Decommissioning Cost Analysis

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Table D-2
Prairie Island DECON Unit 2
60 Years of Spent Fuel Storage Decommissioning Cost Estimate
(Thousands of 2014 Dollars)

Activity Index	Activity Description	Decon Cost	Removal Cost	Packaging Costs	Transport Costs	Off-Site Processing Costs	LLRW Disposal Costs	Other Costs	Total Contingency	Total Costs	NRC Lic. Term. Costs	Spent Fuel Management Costs	Site Restoration Costs	Processed Volume Cu. Feet	Burial Volumes				Burial / Processed Wt., Lbs.	Craft Manhours	Utility and Contractor Manhours
															Class A Cu. Feet	Class B Cu. Feet	Class C Cu. Feet	GTCC Cu. Feet			
PERIOD 2a - Large Component Removal																					
Period 2a Direct Decommissioning Activities																					
Nuclear Steam Supply System Removal																					
2a.1.1.1	Reactor Coolant Piping	45	38	6	8	-	144	-	70	313	313	-	-	-	305	-	-	-	34,809	1,414	-
2a.1.1.2	Pressurizer Relief Tank	20	17	4	5	-	88	-	37	172	172	-	-	-	192	-	-	-	21,288	625	-
2a.1.1.3	Reactor Coolant Pumps & Motors	48	56	98	86	-	711	-	238	1,238	1,238	-	-	-	2,332	-	-	-	295,800	2,049	100
2a.1.1.4	Pressurizer	43	64	459	88	-	669	-	264	1,587	1,587	-	-	-	2,196	-	-	-	185,015	2,355	938
2a.1.1.5	Steam Generators	199	2,924	2,014	1,728	1,205	3,449	-	2,334	13,853	13,853	-	-	18,672	11,316	-	-	-	1,668,341	11,617	2,875
2a.1.1.6	CRDMs/ICIs/Service Structure Removal	253	238	210	48	-	736	-	398	1,884	1,884	-	-	-	4,797	-	-	-	177,400	8,104	-
2a.1.1.7	Reactor Vessel Internals	65	2,533	19,029	960	-	7,116	241	10,524	40,469	40,469	-	-	-	501	125	617	-	146,554	20,867	967
2a.1.1.8	Reactor Vessel	79	4,443	1,563	710	-	1,890	241	4,921	13,847	13,847	-	-	-	5,690	-	-	-	570,074	20,867	967
2a.1.1	Totals	752	10,312	23,385	3,632	1,205	14,804	483	18,787	73,360	73,360	-	-	18,672	27,330	125	617	-	3,099,281	67,896	5,846
Removal of Major Equipment																					
2a.1.2	Main Turbine/Generator	-	272	180	58	263	296	-	208	1,277	1,277	-	-	2,131	1,187	-	-	-	206,316	4,667	-
2a.1.3	Main Condensers	-	2,284	115	51	352	435	-	752	3,989	3,989	-	-	3,800	1,587	-	-	-	275,903	39,151	-
Cascading Costs from Clean Building Demolition																					
2a.1.4.1	Reactor	-	991	-	-	-	-	-	149	1,139	1,139	-	-	-	-	-	-	-	-	11,180	-
2a.1.4.2	Auxiliary	-	425	-	-	-	-	-	64	489	489	-	-	-	-	-	-	-	-	4,945	-
2a.1.4.3	Radwaste	-	15	-	-	-	-	-	2	18	18	-	-	-	-	-	-	-	-	179	-
2a.1.4	Totals	-	1,431	-	-	-	-	-	215	1,646	1,646	-	-	-	-	-	-	-	-	16,304	-
Disposal of Plant Systems																					
2a.1.5.1	Admin Bldg Ventilation	-	5	-	-	-	-	-	1	6	-	-	6	-	-	-	-	-	-	90	-
2a.1.5.2	Air Removal	-	23	-	-	-	-	-	3	27	-	-	27	-	-	-	-	-	-	422	-
2a.1.5.3	Auxiliary Feedwater	-	37	-	-	-	-	-	6	43	-	-	43	-	-	-	-	-	-	676	-
2a.1.5.4	Auxiliary Feedwater - RCA	-	30	0	1	15	-	-	10	56	56	-	-	178	-	-	-	-	7,214	486	-
2a.1.5.5	Bleed Steam	-	72	-	-	-	-	-	11	83	-	-	83	-	-	-	-	-	-	1,331	-
2a.1.5.6	Caustic Addition - RCA	-	32	0	1	20	-	-	11	65	65	-	-	240	-	-	-	-	9,761	468	-
2a.1.5.7	Chemical Feed	-	14	-	-	-	-	-	2	16	-	-	16	-	-	-	-	-	-	261	-
2a.1.5.8	Chemical Feed - RCA	-	2	0	0	1	-	-	1	4	4	-	-	16	-	-	-	-	634	31	-
2a.1.5.9	Circulating Water	-	22	-	-	-	-	-	3	25	-	-	25	-	-	-	-	-	-	401	-
2a.1.5.10	Condensate	-	424	-	-	-	-	-	64	487	-	-	487	-	-	-	-	-	-	7,537	-
2a.1.5.11	Condensate Polishing	-	167	-	-	-	-	-	25	192	-	-	192	-	-	-	-	-	-	2,987	-
2a.1.5.12	Condensate Polishing - RCA	-	31	1	3	40	-	-	14	89	89	-	-	483	-	-	-	-	19,616	493	-
2a.1.5.13	Electro-Hydraulic	-	8	-	-	-	-	-	1	9	-	-	9	-	-	-	-	-	-	143	-
2a.1.5.14	External Circulating Water	-	21	-	-	-	-	-	3	24	-	-	24	-	-	-	-	-	-	385	-
2a.1.5.15	External Circulating Water - RCA	-	58	1	4	60	-	-	24	149	149	-	-	721	-	-	-	-	29,284	938	-
2a.1.5.16	Feedwater	-	102	-	-	-	-	-	15	118	-	-	118	-	-	-	-	-	-	1,840	-
2a.1.5.17	Feedwater - RCA	-	200	6	26	347	-	-	106	685	685	-	-	4,147	-	-	-	-	168,414	3,377	-
2a.1.5.18	Gland Seal	-	27	-	-	-	-	-	4	31	-	-	31	-	-	-	-	-	-	504	-
2a.1.5.19	Heater Drain	-	308	-	-	-	-	-	46	355	-	-	355	-	-	-	-	-	-	5,638	-
2a.1.5.20	Hypobromous Acid Feed	-	5	-	-	-	-	-	1	5	-	-	5	-	-	-	-	-	-	86	-
2a.1.5.21	Hypobromous Acid Feed - RCA	-	1	0	0	0	-	-	0	1	1	-	-	2	-	-	-	-	100	12	-
2a.1.5.22	Internal Circ Water & CDSR	-	20	-	-	-	-	-	3	23	-	-	23	-	-	-	-	-	-	366	-
2a.1.5.23	Main Gen/Exciter/Transformer	-	0	-	-	-	-	-	0	0	-	-	0	-	-	-	-	-	-	5	-
2a.1.5.24	Main Steam	-	81	-	-	-	-	-	12	93	-	-	93	-	-	-	-	-	-	1,482	-
2a.1.5.25	Main Steam - RCA	-	306	8	32	432	-	-	147	926	926	-	-	5,166	-	-	-	-	209,799	5,146	-
2a.1.5.26	Repairable Spare Snubbers	-	5	0	0	1	-	-	1	7	7	-	-	12	-	-	-	-	490	82	-
2a.1.5.27	Steam Exclusion	-	2	-	-	-	-	-	0	2	-	-	2	-	-	-	-	-	-	32	-
2a.1.5.28	Steam Exclusion - RCA	-	3	0	0	2	-	-	1	7	7	-	-	24	-	-	-	-	966	47	-
2a.1.5.29	Steam Generator Blowdown	-	337	19	22	159	173	-	157	867	867	-	-	1,906	631	-	-	-	119,126	5,778	-
2a.1.5.30	Steam Generators	-	4	-	-	-	-	-	1	5	-	-	5	-	-	-	-	-	-	75	-
2a.1.5.31	Turbine & Moisture Separators	-	304	-	-	-	-	-	46	350	-	-	350	-	-	-	-	-	-	5,472	-
2a.1.5.32	Turbine Oil Purification	-	43	-	-	-	-	-	6	49	-	-	49	-	-	-	-	-	-	757	-
2a.1.5.33	Water Treatment	-	363	-	-	-	-	-	54	418	-	-	418	-	-	-	-	-	-	6,677	-
2a.1.5.34	Water Treatment - RCA	-	16	0	1	10	-	-	6	32	32	-	-	115	-	-	-	-	4,652	252	-
2a.1.5	Totals	-	3,075	36	91	1,088	173	-	787	5,250	2,889	-	2,361	13,010	631	-	-	-	570,056	54,280	-
2a.1.6	Scaffolding in support of decommissioning	-	2,504	23	8	94	24	-	650	3,303	3,303	-	-	1,012	89	-	-	-	51,445	26,270	-
2a.1	Subtotal Period 2a Activity Costs	752	19,878	23,738	3,840	3,003	15,733	483	21,398	88,825	86,464	-	2,361	38,625	30,824	125	617	-	4,203,002	208,568	5,846

*Prairie Island Nuclear Nuclear Generating Plant
Decommissioning Cost Analysis*

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															Class A Cu. Feet	Class B Cu. Feet	Class C Cu. Feet	GTCC Cu. Feet			
Period 2a Additional Costs																					
2a.2.1	Remedial Action Surveys	-	-	-	-	-	-	1,249	375	1,624	1,624	-	-	-	-	-	-	-	-	25,570	-
2a.2	Subtotal Period 2a Additional Costs	-	-	-	-	-	-	1,249	375	1,624	1,624	-	-	-	-	-	-	-	-	25,570	-
Period 2a Collateral Costs																					
2a.3.1	Process decommissioning water waste	49	-	32	82	-	140	-	75	378	378	-	-	-	314	-	-	-	18,829	61	-
2a.3.2	Process decommissioning chemical flush waste	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2a.3.3	Small tool allowance	-	219	-	-	-	-	-	33	252	227	-	25	-	-	-	-	-	-	-	-
2a.3.4	Spent Fuel Capital and Transfer	-	-	-	-	-	-	8,802	1,320	10,123	-	10,123	-	-	-	-	-	-	-	-	-
2a.3.5	On-site survey and release of 0.0 tons clean metallic waste	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2a.3	Subtotal Period 2a Collateral Costs	49	219	32	82	-	140	8,802	1,428	10,752	604	10,123	25	-	314	-	-	-	18,829	61	-
Period 2a Period-Dependent Costs																					
2a.4.1	Decon supplies	66	-	-	-	-	-	-	17	83	83	-	-	-	-	-	-	-	-	-	-
2a.4.2	Insurance	-	-	-	-	-	-	615	62	677	677	-	-	-	-	-	-	-	-	-	-
2a.4.3	Property taxes	-	-	-	-	-	-	1,839	184	2,023	1,821	-	202	-	-	-	-	-	-	-	-
2a.4.4	Health physics supplies	-	1,680	-	-	-	-	-	420	2,100	2,100	-	-	-	-	-	-	-	-	-	-
2a.4.5	Heavy equipment rental	-	2,498	-	-	-	-	-	375	2,873	2,873	-	-	-	-	-	-	-	-	-	-
2a.4.6	Disposal of DAW generated	-	-	85	28	-	323	-	94	530	530	-	-	-	4,113	-	-	-	82,265	134	-
2a.4.7	Plant energy budget	-	-	-	-	-	-	3,612	542	4,154	4,154	-	-	-	-	-	-	-	-	-	-
2a.4.8	NRC Fees	-	-	-	-	-	-	536	54	590	590	-	-	-	-	-	-	-	-	-	-
2a.4.9	Emergency Planning Fees	-	-	-	-	-	-	1,461	146	1,607	-	1,607	-	-	-	-	-	-	-	-	-
2a.4.10	Fixed Overhead	-	-	-	-	-	-	1,508	226	1,734	1,734	-	-	-	-	-	-	-	-	-	-
2a.4.11	Spent Fuel Pool O&M	-	-	-	-	-	-	487	73	560	-	560	-	-	-	-	-	-	-	-	-
2a.4.12	ISFSI Operating Costs	-	-	-	-	-	-	59	9	68	-	68	-	-	-	-	-	-	-	-	-
2a.4.13	Railroad Track Maintenance	-	-	-	-	-	-	264	40	304	-	-	304	-	-	-	-	-	-	-	-
2a.4.14	Security Staff Cost	-	-	-	-	-	-	5,611	842	6,452	6,452	-	-	-	-	-	-	-	-	-	162,281
2a.4.15	DOC Staff Cost	-	-	-	-	-	-	14,153	2,123	16,276	16,276	-	-	-	-	-	-	-	-	-	194,994
2a.4.16	Utility Staff Cost	-	-	-	-	-	-	19,180	2,877	22,057	22,057	-	-	-	-	-	-	-	-	-	363,049
2a.4	Subtotal Period 2a Period-Dependent Costs	66	4,178	85	28	-	323	49,325	8,081	62,086	59,346	2,234	506	-	4,113	-	-	-	82,265	134	720,324
2a.0	TOTAL PERIOD 2a COST	867	24,276	23,856	3,950	3,003	16,196	59,859	31,282	163,287	148,038	12,356	2,892	38,625	35,251	125	617	-	4,304,096	234,334	726,171
PERIOD 2b - Site Decontamination																					
Period 2b Direct Decommissioning Activities																					
Disposal of Plant Systems																					
2b.1.1.1	ADT & Misc Ventilation	-	20	0	1	13	2	-	8	45	45	-	-	153	9	-	-	-	6,814	363	-
2b.1.1.2	Aux Bldg Normal Ventilation	-	57	2	5	58	11	-	27	159	159	-	-	692	39	-	-	-	30,671	1,013	-
2b.1.1.3	Aux Bldg Special Ventilation	-	11	0	1	6	2	-	4	24	24	-	-	70	6	-	-	-	3,243	197	-
2b.1.1.4	Battery Rm Special Ventilation	-	1	-	-	-	-	-	0	2	-	-	2	-	-	-	-	-	-	24	-
2b.1.1.5	Boron Recycle	0	3	0	0	0	2	-	2	8	8	-	-	3	9	-	-	-	709	50	-
2b.1.1.6	Chemical & Volume Control	624	762	57	45	197	540	-	679	2,903	2,903	-	-	2,356	1,977	-	-	-	225,854	23,197	-
2b.1.1.7	Cold Chemical Lab Ventilation	-	1	-	-	-	-	-	0	1	-	-	1	-	-	-	-	-	-	9	-
2b.1.1.8	Component Cooling - RCA	-	521	19	75	1,004	-	-	294	1,912	1,912	-	-	11,996	-	-	-	-	487,169	8,583	-
2b.1.1.9	Containment Cooling	-	28	-	-	-	-	-	4	32	-	-	32	-	-	-	-	-	-	502	-
2b.1.1.10	Containment Cooling - RCA	-	242	4	17	229	-	-	98	591	591	-	-	2,743	-	-	-	-	111,390	3,949	-
2b.1.1.11	Containment Hydrogen Control - RCA	-	29	0	1	12	-	-	9	52	52	-	-	141	-	-	-	-	5,742	494	-
2b.1.1.12	Containment Spray - RCA	-	155	2	9	122	-	-	58	346	346	-	-	1,453	-	-	-	-	59,019	2,617	-
2b.1.1.13	Containment Ventilation	-	191	22	40	395	198	-	165	1,011	1,011	-	-	4,721	722	-	-	-	239,450	3,375	-
2b.1.1.14	Control/Relay/Cmptr Rm Vent	-	26	1	2	22	6	-	11	67	67	-	-	260	20	-	-	-	11,915	454	-
2b.1.1.15	Cooling Water	-	128	-	-	-	-	-	19	147	-	-	147	-	-	-	-	-	-	2,344	-
2b.1.1.16	Cooling Water - RCA	-	385	13	52	706	-	-	211	1,368	1,368	-	-	8,442	-	-	-	-	342,822	6,311	-
2b.1.1.17	Cranes/Hoists/Elevators - RCA	-	3	0	1	9	-	-	2	14	14	-	-	103	-	-	-	-	4,184	48	-
2b.1.1.18	D3 Emergency Diesel	-	8	-	-	-	-	-	1	9	-	-	9	-	-	-	-	-	-	141	-
2b.1.1.19	D4 Emergency Diesel	-	8	-	-	-	-	-	1	9	-	-	9	-	-	-	-	-	-	141	-
2b.1.1.20	D5 Emergency Diesel	-	0	-	-	-	-	-	0	0	-	-	0	-	-	-	-	-	-	5	-
2b.1.1.21	Electrical - Clean	-	1,389	-	-	-	-	-	208	1,597	-	-	1,597	-	-	-	-	-	-	24,276	-
2b.1.1.22	Electrical - Contaminated	-	380	4	14	167	21	-	128	714	714	-	-	1,997	75	-	-	-	86,080	6,503	-
2b.1.1.23	Electrical - Decontaminated	-	2,332	29	117	1,569	-	-	839	4,885	4,885	-	-	18,753	-	-	-	-	761,569	38,423	-
2b.1.1.24	Filter Rm Ventilation	-	4	0	0	2	0	-	1	8	8	-	-	24	1	-	-	-	1,020	69	-
2b.1.1.25	Fire Protection & Detection	-	164	-	-	-	-	-	25	188	-	-	188	-	-	-	-	-	-	3,009	-
2b.1.1.26	Fire Protection & Detection - RCA	-	197	3	11	153	-	-	74	438	438	-	-	1,828	-	-	-	-	74,245	3,134	-
2b.1.1.27	Fuel Handling	-	61	1	2	17	14	-	21	116	116	-	-	200	49	-	-	-	11,396	1,101	-
2b.1.1.28	Fuel Oil	-	1	-	-	-	-	-	0	1	-	-	1	-	-	-	-	-	-	9	-
2b.1.1.29	HVAC - Clean	-	121	-	-	-	-	-	18	139	-	-	139	-	-	-	-	-	-	2,373	-
2b.1.1.30	HVAC - Contaminated	-	1,038	24	73	899	111	-	436	2,581	2,581	-	-	10,745	405	-	-	-	463,144	16,579	-
2b.1.1.31	Heating	-	257	-	-	-	-	-	39	296	-	-	296	-	-	-	-	-	-	4,804	-

Table D-2
Prairie Island DECON Unit 2
60 Years of Spent Fuel Storage Decommissioning Cost Estimate
(Thousands of 2014 Dollars)

Activity Index	Activity Description	Decon Cost	Removal Cost	Packaging Costs	Transport Costs	Off-Site Processing Costs	LLRW Disposal Costs	Other Costs	Total Contingency	Total Costs	NRC Lic. Term. Costs	Spent Fuel Management Costs	Site Restoration Costs	Processed Volume Cu. Feet	Burial Volumes				Burial / Processed Wt., Lbs.	Craft Manhours	Utility and Contractor Manhours
															Class A Cu. Feet	Class B Cu. Feet	Class C Cu. Feet	GTCC Cu. Feet			
Disposal of Plant Systems (continued)																					
2b.1.1.32	Heating - RCA	-	270	3	12	160	-	-	93	538	538	-	-	1,907	-	-	-	-	77,458	4,086	-
2b.1.1.33	Hot Lab & Sample Rm Ventilation	-	16	0	1	9	1	-	6	33	33	-	-	107	4	-	-	-	4,632	285	-
2b.1.1.34	Incore Instrumentation	0	24	1	1	5	16	-	11	60	60	-	-	60	58	-	-	-	6,264	458	-
2b.1.1.35	Misc Drains & Vents	-	189	11	9	38	117	-	85	450	450	-	-	458	426	-	-	-	46,850	3,180	-
2b.1.1.36	Misc Lab & Service Areas Vent	-	104	8	6	31	67	-	49	265	265	-	-	370	244	-	-	-	31,186	1,713	-
2b.1.1.37	Miscellaneous Gas	-	58	-	-	-	-	-	9	66	-	-	66	-	-	-	-	-	-	1,073	-
2b.1.1.38	Miscellaneous Gas - RCA	-	107	1	4	50	-	-	35	197	197	-	-	600	-	-	-	-	24,378	1,636	-
2b.1.1.39	Radiation Monitoring	-	6	-	-	-	-	-	1	7	-	-	7	-	-	-	-	-	-	111	-
2b.1.1.40	Radiation Monitoring - RCA	-	52	0	2	26	-	-	17	98	98	-	-	316	-	-	-	-	12,826	782	-
2b.1.1.41	Reactor Coolant	135	190	19	13	19	201	-	172	749	749	-	-	229	730	-	-	-	57,672	5,517	-
2b.1.1.42	Reactor Hot Sampling	116	102	10	5	5	86	-	107	430	430	-	-	54	312	-	-	-	22,919	3,686	-
2b.1.1.43	Reactor Makeup	-	33	-	-	-	-	-	5	38	-	-	38	-	-	-	-	-	-	583	-
2b.1.1.44	Reactor Makeup - RCA	-	3	0	0	2	-	-	1	7	7	-	-	28	-	-	-	-	1,148	47	-
2b.1.1.45	Reactor Vessel	8	14	0	0	2	4	-	9	37	37	-	-	22	14	-	-	-	1,826	385	-
2b.1.1.46	Residual Heat Removal	302	318	81	68	239	891	-	508	2,406	2,406	-	-	2,853	3,244	-	-	-	330,651	7,112	-
2b.1.1.47	Safeguards Chilled Water	-	4	-	-	-	-	-	1	5	-	-	5	-	-	-	-	-	-	75	-
2b.1.1.48	Safety Injection	-	712	38	59	559	317	-	354	2,039	2,039	-	-	6,676	1,161	-	-	-	347,600	12,284	-
2b.1.1.49	Sampling	-	42	3	2	3	26	-	18	94	94	-	-	37	93	-	-	-	7,697	714	-
2b.1.1.50	Service Bldg & New Cmptr Vent	-	0	-	-	-	-	-	0	0	-	-	0	-	-	-	-	-	-	6	-
2b.1.1.51	Shield Bldg Ventilation	-	98	13	20	170	133	-	87	520	520	-	-	2,028	484	-	-	-	114,378	1,743	-
2b.1.1.52	Station & Instrument Air	-	129	-	-	-	-	-	19	148	-	-	148	-	-	-	-	-	-	2,424	-
2b.1.1.53	Station & Instrument Air - RCA	-	240	3	10	136	-	-	82	471	471	-	-	1,625	-	-	-	-	65,986	3,638	-
2b.1.1.54	Turbine Bldg Traps & Drains	-	24	-	-	-	-	-	4	28	-	-	28	-	-	-	-	-	-	462	-
2b.1.1.55	Turbine Bldg Traps & Drains - RCA	-	24	0	1	15	-	-	8	48	48	-	-	180	-	-	-	-	7,321	344	-
2b.1.1.56	Turbine Bldg Ventilation	-	37	-	-	-	-	-	6	43	-	-	43	-	-	-	-	-	-	655	-
2b.1.1.57	Unit Coolers	-	18	-	-	-	-	-	3	21	-	-	21	-	-	-	-	-	-	332	-
2b.1.1.58	Unit Coolers - RCA	-	45	0	1	19	-	-	14	80	80	-	-	232	-	-	-	-	9,413	690	-
2b.1.1.59	Waste Gas Disposal	461	390	39	36	205	368	-	460	1,959	1,959	-	-	2,453	1,358	-	-	-	188,334	14,308	-
2b.1.1.60	Waste Liquid Disposal	1,194	1,455	105	78	306	983	-	1,275	5,397	5,397	-	-	3,655	3,594	-	-	-	385,370	44,485	-
2b.1.1.61	Waste Solid Disposal	96	118	11	8	33	108	-	112	485	485	-	-	389	393	-	-	-	41,732	3,481	-
2b.1.1	Totals	2,936	13,345	528	803	7,610	4,225	-	6,934	36,382	33,604	-	2,777	90,963	15,429	-	-	-	4,712,076	270,390	-
2b.1.2	Scaffolding in support of decommissioning	-	3,130	29	10	117	31	-	812	4,129	4,129	-	-	1,265	112	-	-	-	64,307	32,837	-
Decontamination of Site Buildings																					
2b.1.3.1	Reactor	1,009	2,385	127	871	187	10,692	-	3,945	19,217	19,217	-	-	2,230	57,418	-	-	-	3,559,977	50,853	-
2b.1.3.2	Auxiliary	1,070	358	11	82	89	561	-	791	2,962	2,962	-	-	1,060	3,355	-	-	-	332,498	23,808	-
2b.1.3.3	Backwash Waste Receiving Tank	-	25	1	12	-	84	-	29	151	151	-	-	-	507	-	-	-	43,896	299	-
2b.1.3.4	Drum Transfer & Truck Loading Enclosure	15	7	0	2	2	12	-	13	51	51	-	-	19	74	-	-	-	7,118	368	-
2b.1.3.5	LLRW Storage Enclosure	102	46	1	12	3	84	-	86	334	334	-	-	38	502	-	-	-	44,971	2,424	-
2b.1.3.6	Radwaste	46	20	1	5	3	38	-	39	152	152	-	-	42	225	-	-	-	21,136	1,082	-
2b.1.3.7	Resin Disposal	13	10	0	2	7	12	-	14	58	58	-	-	83	69	-	-	-	9,271	383	-
2b.1.3	Totals	2,255	2,852	141	985	290	11,483	-	4,917	22,924	22,924	-	-	3,471	62,151	-	-	-	4,018,868	79,216	-
2b.1	Subtotal Period 2b Activity Costs	5,191	19,327	698	1,799	8,017	15,739	-	12,663	63,435	60,657	-	2,777	95,700	77,691	-	-	-	8,795,250	382,443	-
Period 2b Additional Costs																					
2b.2.1	Remedial Action Surveys	-	-	-	-	-	-	1,538	461	2,000	2,000	-	-	-	-	-	-	-	-	31,493	-
2b.2.2	Operational Equipment	-	-	9	31	302	-	-	51	391	391	-	-	5,855	-	-	-	-	146,375	16	-
2b.2	Subtotal Period 2b Additional Costs	-	-	9	31	302	-	1,538	512	2,391	2,391	-	-	5,855	-	-	-	-	146,375	31,509	-
Period 2b Collateral Costs																					
2b.3.1	Process decommissioning water waste	157	-	104	267	-	454	-	242	1,225	1,225	-	-	-	1,021	-	-	-	61,281	199	-
2b.3.2	Process decommissioning chemical flush waste	3	-	113	416	-	911	-	303	1,745	1,745	-	-	-	1,154	-	-	-	122,948	216	-
2b.3.3	Small tool allowance	-	351	-	-	-	-	-	53	404	404	-	-	-	-	-	-	-	-	-	-
2b.3.4	Spent Fuel Capital and Transfer	-	-	-	-	-	-	5,547	832	6,379	-	6,379	-	-	-	-	-	-	-	-	-
2b.3.5	On-site survey and release of 0.437 tons clean metallic waste	-	-	-	-	-	-	1	0	1	1	-	-	-	-	-	-	-	-	-	-
2b.3	Subtotal Period 2b Collateral Costs	160	351	217	683	-	1,365	5,548	1,430	9,754	3,374	6,379	-	-	2,175	-	-	-	184,229	415	-
Period 2b Period-Dependent Costs																					
2b.4.1	Decon supplies	894	-	-	-	-	-	-	224	1,118	1,118	-	-	-	-	-	-	-	-	-	-
2b.4.2	Insurance	-	-	-	-	-	-	758	76	833	833	-	-	-	-	-	-	-	-	-	-
2b.4.3	Property taxes	-	-	-	-	-	-	2,157	216	2,373	2,373	-	-	-	-	-	-	-	-	-	-
2b.4.4	Health physics supplies	-	2,630	-	-	-	-	-	658	3,288	3,288	-	-	-	-	-	-	-	-	-	-
2b.4.5	Heavy equipment rental	-	3,046	-	-	-	-	-	457	3,503	3,503	-	-	-	-	-	-	-	-	-	-
2b.4.6	Disposal of DAW generated	-	-	114	37	-	430	-	125	706	706	-	-	-	5,477	-	-	-	109,540	179	-
2b.4.7	Plant energy budget	-	-	-	-	-	-	3,512	527	4,039	4,039	-	-	-	-	-	-	-	-	-	-
2b.4.8	NRC Fees	-	-	-	-	-	-	660	66	726	726	-	-	-	-	-	-	-	-	-	-

Prairie Island Nuclear Nuclear Generating Plant
Decommissioning Cost Analysis

Table D-2
Prairie Island DECON Unit 2
60 Years of Spent Fuel Storage Decommissioning Cost Estimate
(Thousands of 2014 Dollars)

Activity Index	Activity Description	Decon Cost	Removal Cost	Packaging Costs	Transport Costs	Off-Site Processing Costs	LLRW Disposal Costs	Other Costs	Total Contingency	Total Costs	NRC Lic. Term. Costs	Spent Fuel Management Costs	Site Restoration Costs	Processed Volume Cu. Feet	Burial Volumes				Burial / Processed Wt., Lbs.	Craft Manhours	Utility and Contractor Manhours
															Class A Cu. Feet	Class B Cu. Feet	Class C Cu. Feet	GTCC Cu. Feet			
Period 2b Period-Dependent Costs (continued)																					
2b.4.9	Emergency Planning Fees	-	-	-	-	-	-	1,799	180	1,979	-	1,979	-	-	-	-	-	-	-	-	-
2b.4.10	Fixed Overhead	-	-	-	-	-	-	1,857	279	2,136	2,136	-	-	-	-	-	-	-	-	-	-
2b.4.11	Spent Fuel Pool O&M	-	-	-	-	-	-	599	90	689	-	689	-	-	-	-	-	-	-	-	-
2b.4.12	Liquid Radwaste Processing Equipment/Services	-	-	-	-	-	-	304	46	349	349	-	-	-	-	-	-	-	-	-	-
2b.4.13	ISFSI Operating Costs	-	-	-	-	-	-	72	11	83	-	83	-	-	-	-	-	-	-	-	-
2b.4.14	Railroad Track Maintenance	-	-	-	-	-	-	81	12	93	-	-	93	-	-	-	-	-	-	-	-
2b.4.15	Security Staff Cost	-	-	-	-	-	-	6,910	1,037	7,947	7,947	-	-	-	-	-	-	-	-	-	199,870
2b.4.16	DOC Staff Cost	-	-	-	-	-	-	16,857	2,529	19,386	19,386	-	-	-	-	-	-	-	-	-	230,680
2b.4.17	Utility Staff Cost	-	-	-	-	-	-	22,809	3,421	26,230	26,230	-	-	-	-	-	-	-	-	-	428,180
2b.4	Subtotal Period 2b Period-Dependent Costs	894	5,676	114	37	-	430	58,375	9,950	75,477	72,632	2,751	93	-	5,477	-	-	-	109,540	179	858,730
2b.0	TOTAL PERIOD 2b COST	6,245	25,354	1,038	2,550	8,319	17,534	65,461	24,555	151,056	139,055	9,131	2,870	101,555	85,343	-	-	-	9,235,394	414,545	858,730
PERIOD 2c - Spent fuel delay prior to SFP decon																					
Period 2c Direct Decommissioning Activities																					
Period 2c Collateral Costs																					
2c.3.1	Spent Fuel Capital and Transfer	-	-	-	-	-	-	69,007	10,351	79,358	-	79,358	-	-	-	-	-	-	-	-	-
2c.3	Subtotal Period 2c Collateral Costs	-	-	-	-	-	-	69,007	10,351	79,358	-	79,358	-	-	-	-	-	-	-	-	-
Period 2c Period-Dependent Costs																					
2c.4.1	Insurance	-	-	-	-	-	-	5,381	538	5,919	5,919	-	-	-	-	-	-	-	-	-	-
2c.4.2	Property taxes	-	-	-	-	-	-	11,530	1,153	12,684	12,684	-	-	-	-	-	-	-	-	-	-
2c.4.3	Health physics supplies	-	2,115	-	-	-	-	-	529	2,644	2,644	-	-	-	-	-	-	-	-	-	-
2c.4.4	Disposal of DAW generated	-	-	92	30	-	349	-	101	572	572	-	-	-	4,440	-	-	-	88,800	145	-
2c.4.5	Plant energy budget	-	-	-	-	-	-	6,652	998	7,650	7,650	-	-	-	-	-	-	-	-	-	-
2c.4.6	NRC Fees	-	-	-	-	-	-	2,860	286	3,146	3,146	-	-	-	-	-	-	-	-	-	-
2c.4.7	Emergency Planning Fees	-	-	-	-	-	-	12,779	1,278	14,057	-	14,057	-	-	-	-	-	-	-	-	-
2c.4.8	Fixed Overhead	-	-	-	-	-	-	13,191	1,979	15,169	15,169	-	-	-	-	-	-	-	-	-	-
2c.4.9	Spent Fuel Pool O&M	-	-	-	-	-	-	4,257	638	4,895	-	4,895	-	-	-	-	-	-	-	-	-
2c.4.10	Liquid Radwaste Processing Equipment/Services	-	-	-	-	-	-	216	32	248	248	-	-	-	-	-	-	-	-	-	-
2c.4.11	ISFSI Operating Costs	-	-	-	-	-	-	514	77	591	-	591	-	-	-	-	-	-	-	-	-
2c.4.12	Railroad Track Maintenance	-	-	-	-	-	-	574	86	660	-	-	660	-	-	-	-	-	-	-	-
2c.4.13	Security Staff Cost	-	-	-	-	-	-	41,864	6,280	48,144	24,072	24,072	-	-	-	-	-	-	-	-	1,195,234
2c.4.14	Utility Staff Cost	-	-	-	-	-	-	46,311	6,947	53,258	26,629	26,629	-	-	-	-	-	-	-	-	886,606
2c.4	Subtotal Period 2c Period-Dependent Costs	-	2,115	92	30	-	349	146,129	20,922	169,638	98,734	70,244	660	-	4,440	-	-	-	88,800	145	2,081,840
2c.0	TOTAL PERIOD 2c COST	-	2,115	92	30	-	349	215,136	31,273	248,995	98,734	149,602	660	-	4,440	-	-	-	88,800	145	2,081,840
PERIOD 2d - Decontamination Following Wet Fuel Storage																					
Period 2d Direct Decommissioning Activities																					
2d.1.1	Remove spent fuel racks	287	29	90	32	-	574	-	308	1,320	1,320	-	-	-	2,092	-	-	-	138,298	576	-
Disposal of Plant Systems																					
2d.1.2.1	Electrical - Contaminated - Fuel Pool	-	163	2	6	72	9	-	55	307	307	-	-	864	33	-	-	-	37,250	2,783	-
2d.1.2.2	Electrical - Decontaminated - Fuel Pool	-	1,001	13	50	675	-	-	360	2,099	2,099	-	-	8,069	-	-	-	-	327,668	16,495	-
2d.1.2.3	Fire Protection & Detection - RCA Fuel P	-	30	0	2	24	-	-	11	67	67	-	-	286	-	-	-	-	11,622	476	-
2d.1.2.4	HVAC - Contaminated - Fuel Pool	-	466	11	33	404	50	-	196	1,159	1,159	-	-	4,828	182	-	-	-	208,080	7,448	-
2d.1.2.5	Safeguards Chilled Water - RCA	-	4	0	0	2	-	-	1	7	7	-	-	26	-	-	-	-	1,045	51	-
2d.1.2.6	Spent Fuel Pool Cooling	27	29	3	2	3	29	-	29	122	122	-	-	39	107	-	-	-	8,635	882	-
2d.1.2.7	Spent Fuel Pool Normal Ventilation	-	22	1	2	22	3	-	10	60	60	-	-	265	12	-	-	-	11,532	394	-
2d.1.2	Totals	27	1,715	29	94	1,203	91	-	662	3,822	3,822	-	-	14,376	333	-	-	-	605,832	28,530	-
Decontamination of Site Buildings																					
2d.1.3.1	Fuel Handling of Aux Building	860	941	9	34	202	167	-	743	2,956	2,956	-	-	2,417	944	-	-	-	177,818	30,401	-
2d.1.3	Totals	860	941	9	34	202	167	-	743	2,956	2,956	-	-	2,417	944	-	-	-	177,818	30,401	-
2d.1.4	Scaffolding in support of decommissioning	-	626	6	2	23	6	-	162	826	826	-	-	253	22	-	-	-	12,861	6,567	-
2d.1	Subtotal Period 2d Activity Costs	1,174	3,311	134	163	1,428	838	-	1,876	8,923	8,923	-	-	17,046	3,391	-	-	-	934,809	66,074	-
Period 2d Additional Costs																					
2d.2.1	License Termination Survey Planning	-	-	-	-	-	-	547	164	711	711	-	-	-	-	-	-	-	-	-	6,240
2d.2.2	Remedial Action Surveys	-	-	-	-	-	-	793	238	1,031	1,031	-	-	-	-	-	-	-	-	16,230	-
2d.2	Subtotal Period 2d Additional Costs	-	-	-	-	-	-	1,339	402	1,741	1,741	-	-	-	-	-	-	-	-	16,230	6,240

Prairie Island Nuclear Nuclear Generating Plant
Decommissioning Cost Analysis

Table D-2
Prairie Island DECON Unit 2
60 Years of Spent Fuel Storage Decommissioning Cost Estimate
(Thousands of 2014 Dollars)

Activity Index	Activity Description	Decon Cost	Removal Cost	Packaging Costs	Transport Costs	Off-Site Processing Costs	LLRW Disposal Costs	Other Costs	Total Contingency	Total Costs	NRC Lic. Term. Costs	Spent Fuel Management Costs	Site Restoration Costs	Processed Volume Cu. Feet	Burial Volumes				Burial / Processed Wt., Lbs.	Craft Manhours	Utility and Contractor Manhours
															Class A Cu. Feet	Class B Cu. Feet	Class C Cu. Feet	GTCC Cu. Feet			
PERIOD 3b - Site Restoration																					
Period 3b Direct Decommissioning Activities																					
Demolition of Remaining Site Buildings																					
3b.1.1.1	Reactor	-	5,734	-	-	-	-	-	860	6,594	-	-	6,594	-	-	-	-	-	-	65,033	-
3b.1.1.2	Auxiliary	-	3,832	-	-	-	-	-	575	4,407	-	-	4,407	-	-	-	-	-	-	44,627	-
3b.1.1.3	Condensate Storage Tank Foundation	-	15	-	-	-	-	-	2	17	-	-	17	-	-	-	-	-	-	193	-
3b.1.1.4	Construction Warehouse & Fab Shop	-	169	-	-	-	-	-	25	194	-	-	194	-	-	-	-	-	-	2,477	-
3b.1.1.5	D3/D4 Emergency Generator	-	28	-	-	-	-	-	4	33	-	-	33	-	-	-	-	-	-	371	-
3b.1.1.6	Drum Transfer & Truck Loading Enclosure	-	25	-	-	-	-	-	4	29	-	-	29	-	-	-	-	-	-	361	-
3b.1.1.7	Hydrogen House	-	12	-	-	-	-	-	2	14	-	-	14	-	-	-	-	-	-	153	-
3b.1.1.8	LLRW Storage Enclosure	-	227	-	-	-	-	-	34	261	-	-	261	-	-	-	-	-	-	2,776	-
3b.1.1.9	Radwaste	-	298	-	-	-	-	-	45	342	-	-	342	-	-	-	-	-	-	3,555	-
3b.1.1.10	Resin Disposal	-	28	-	-	-	-	-	4	33	-	-	33	-	-	-	-	-	-	383	-
3b.1.1.11	Sulfuric Acid Tank Enclosure	-	4	-	-	-	-	-	1	4	-	-	4	-	-	-	-	-	-	54	-
3b.1.1.12	Turbine	-	2,599	-	-	-	-	-	390	2,989	-	-	2,989	-	-	-	-	-	-	34,352	-
3b.1.1.13	Turbine Pedestal	-	818	-	-	-	-	-	123	941	-	-	941	-	-	-	-	-	-	7,580	-
3b.1.1.14	Warehouse #2	-	34	-	-	-	-	-	5	39	-	-	39	-	-	-	-	-	-	457	-
3b.1.1.15	Waste Neutralizing Tank House	-	13	-	-	-	-	-	2	15	-	-	15	-	-	-	-	-	-	165	-
3b.1.1.16	Waste Oil Storage	-	17	-	-	-	-	-	3	19	-	-	19	-	-	-	-	-	-	225	-
3b.1.1.17	Water Treatment	-	509	-	-	-	-	-	76	585	-	-	585	-	-	-	-	-	-	6,498	-
3b.1.1.18	Fuel Handling of Aux Building	-	1,927	-	-	-	-	-	289	2,215	-	-	2,215	-	-	-	-	-	-	21,027	-
3b.1.1	Totals	-	16,288	-	-	-	-	-	2,443	18,732	-	-	18,732	-	-	-	-	-	-	190,289	-
Site Closeout Activities																					
3b.1.2	Remove Rubble	-	1,983	-	-	-	-	-	297	2,280	-	-	2,280	-	-	-	-	-	-	10,428	-
3b.1.3	Grade & landscape site	-	432	-	-	-	-	-	65	497	-	-	497	-	-	-	-	-	-	921	-
3b.1.4	Final report to NRC	-	-	-	-	-	-	76	11	87	87	-	-	-	-	-	-	-	-	-	667
3b.1	Subtotal Period 3b Activity Costs	-	18,703	-	-	-	-	76	2,817	21,596	87	-	21,509	-	-	-	-	-	-	201,638	667
Period 3b Additional Costs																					
3b.2.1	Concrete Crushing	-	568	-	-	-	-	7	86	661	-	-	661	-	-	-	-	-	-	2,701	-
3b.2.2	Underground Services Excavations	-	830	-	-	-	-	392	183	1,406	-	-	1,406	-	-	-	-	-	-	7,407	-
3b.2.3	Intake Structure cofferdam	-	381	-	-	-	-	-	57	438	-	-	438	-	-	-	-	-	-	3,386	-
3b.2	Subtotal Period 3b Additional Costs	-	1,780	-	-	-	-	399	327	2,505	-	-	2,505	-	-	-	-	-	-	13,494	-
Period 3b Collateral Costs																					
3b.3.1	Small tool allowance	-	209	-	-	-	-	-	31	241	-	-	241	-	-	-	-	-	-	-	-
3b.3.2	Spent Fuel Capital and Transfer	-	-	-	-	-	-	1,050	157	1,207	-	1,207	-	-	-	-	-	-	-	-	-
3b.3.3	Fixed Overhead - SR	-	-	-	-	-	-	1,141	171	1,313	-	-	1,313	-	-	-	-	-	-	-	-
3b.3	Subtotal Period 3b Collateral Costs	-	209	-	-	-	-	2,191	360	2,760	-	1,207	1,553	-	-	-	-	-	-	-	-
Period 3b Period-Dependent Costs																					
3b.4.1	Insurance	-	-	-	-	-	-	488	49	537	-	537	-	-	-	-	-	-	-	-	-
3b.4.2	Property taxes	-	-	-	-	-	-	1,315	131	1,446	0	1,301	145	-	-	-	-	-	-	-	-
3b.4.3	Heavy equipment rental	-	6,056	-	-	-	-	-	908	6,965	-	-	6,965	-	-	-	-	-	-	-	-
3b.4.4	Plant energy budget	-	-	-	-	-	-	655	98	754	-	-	754	-	-	-	-	-	-	-	-
3b.4.5	NRC ISFSI Fees	-	-	-	-	-	-	385	39	424	-	424	-	-	-	-	-	-	-	-	-
3b.4.6	Emergency Planning Fees	-	-	-	-	-	-	134	13	148	-	148	-	-	-	-	-	-	-	-	-
3b.4.7	ISFSI Operating Costs	-	-	-	-	-	-	101	15	116	-	116	-	-	-	-	-	-	-	-	-
3b.4.8	Railroad Track Maintenance	-	-	-	-	-	-	312	47	358	-	-	358	-	-	-	-	-	-	-	-
3b.4.9	Security Staff Cost	-	-	-	-	-	-	2,738	411	3,148	(0)	2,582	567	-	-	-	-	-	-	-	74,658
3b.4.10	DOC Staff Cost	-	-	-	-	-	-	8,847	1,327	10,174	-	-	10,174	-	-	-	-	-	-	-	117,206
3b.4.11	Utility Staff Cost	-	-	-	-	-	-	4,423	663	5,086	0	915	4,171	-	-	-	-	-	-	-	74,658
3b.4	Subtotal Period 3b Period-Dependent Costs	-	6,056	-	-	-	-	19,397	3,702	29,156	0	6,023	23,132	-	-	-	-	-	-	-	266,521
3b.0	TOTAL PERIOD 3b COST	-	26,749	-	-	-	-	22,063	7,206	56,017	87	7,230	48,700	-	-	-	-	-	-	215,132	267,188
PERIOD 3c - Fuel Storage Operations/Shipping																					
Period 3c Direct Decommissioning Activities																					
Period 3c Collateral Costs																					
3c.3.1	Spent Fuel Capital and Transfer	-	-	-	-	-	-	14,245	2,137	16,382	-	16,382	-	-	-	-	-	-	-	-	-
3c.3	Subtotal Period 3c Collateral Costs	-	-	-	-	-	-	14,245	2,137	16,382	-	16,382	-	-	-	-	-	-	-	-	-

Table D-2
Prairie Island DECON Unit 2
60 Years of Spent Fuel Storage Decommissioning Cost Estimate
(Thousands of 2014 Dollars)

Activity Index	Activity Description	Decon Cost	Removal Cost	Packaging Costs	Transport Costs	Off-Site Processing Costs	LLRW Disposal Costs	Other Costs	Total Contingency	Total Costs	NRC Lic. Term. Costs	Spent Fuel Management Costs	Site Restoration Costs	Processed Volume Cu. Feet	Burial Volumes				Burial / Processed Wt., Lbs.	Craft Manhours	Utility and Contractor Manhours
															Class A Cu. Feet	Class B Cu. Feet	Class C Cu. Feet	GTCC Cu. Feet			
PERIOD 3f - ISFSI Site Restoration																					
Period 3f Direct Decommissioning Activities																					
Period 3f Additional Costs																					
3f.2.1	Demolition and Site Restoration of ISFSI	-	248	-	-	-	-	28	41	317	-	-	317	-	-	-	-	-	-	1,327	80
3f.2	Subtotal Period 3f Additional Costs	-	248	-	-	-	-	28	41	317	-	-	317	-	-	-	-	-	-	1,327	80
Period 3f Collateral Costs																					
3f.3.1	Small tool allowance	-	2	-	-	-	-	-	0	2	-	-	2	-	-	-	-	-	-	-	-
3f.3	Subtotal Period 3f Collateral Costs	-	2	-	-	-	-	-	0	2	-	-	2	-	-	-	-	-	-	-	-
Period 3f Period-Dependent Costs																					
3f.4.1	Insurance	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
3f.4.2	Property taxes	-	-	-	-	-	-	93	9	103	-	-	103	-	-	-	-	-	-	-	
3f.4.3	Plant energy budget	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
3f.4.4	Fixed Overhead	-	-	-	-	-	-	90	13	103	-	-	103	-	-	-	-	-	-	-	
3f.4.5	Railroad Track Maintenance	-	-	-	-	-	-	9	1	10	-	-	10	-	-	-	-	-	-	-	
3f.4.6	Security Staff Cost	-	-	-	-	-	-	33	5	38	-	-	38	-	-	-	-	-	-	1,265	
3f.4.7	Utility Staff Cost	-	-	-	-	-	-	41	6	47	-	-	47	-	-	-	-	-	-	784	
3f.4	Subtotal Period 3f Period-Dependent Costs	-	-	-	-	-	-	266	35	301	-	-	301	-	-	-	-	-	-	-	2,050
3f.0	TOTAL PERIOD 3f COST	-	250	-	-	-	-	293	77	620	-	-	620	-	-	-	-	-	-	1,327	2,130
PERIOD 3 TOTALS		-	26,998	878	0	-	7,482	114,116	21,239	170,713	11,257	110,114	49,342	-	30	-	-	2,810	642,297	219,008	1,138,717
TOTAL COST TO DECOMMISSION		11,409	90,042	26,578	7,213	13,462	47,770	585,759	134,572	916,805	552,040	308,213	56,552	169,551	145,338	713	617	2,810	16,185,020	1,086,709	6,029,826

TOTAL COST TO DECOMMISSION WITH 17.2% CONTINGENCY:	\$916,805	thousands of 2014	dollars
TOTAL NRC LICENSE TERMINATION COST IS 60.21% OR:	\$552,040	thousands of 2014	dollars
SPENT FUEL MANAGEMENT COST IS 33.62% OR:	\$308,213	thousands of 2014	dollars
NON-NUCLEAR DEMOLITION COST IS 6.17% OR:	\$56,552	thousands of 2014	dollars
TOTAL RADWASTE VOLUME BURIED (EXCLUDING GTCC):	146,668	Cubic Feet	
TOTAL GREATER THAN CLASS C RADWASTE VOLUME GENERATED:	2,810	Cubic Feet	
TOTAL SCRAP METAL REMOVED:	34,906	Tons	
TOTAL CRAFT LABOR REQUIREMENTS:	1,086,709	Man-hours	

End Notes:
n/a - indicates that this activity not charged as decommissioning expense.
a - indicates that this activity performed by decommissioning staff.
0 - indicates that this value is less than 0.5 but is non-zero.
a cell containing " - " indicates a zero value

APPENDIX E
DETAILED COST ANALYSIS
SCENARIO 3
DECON DECOMMISSIONING COST ESTIMATE
WITH 100 YEARS OF SPENT FUEL STORAGE
AND PERIODIC TN-40 REPLACEMENT

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Prairie Island Nuclear Nuclear Generating Plant
Decommissioning Cost Analysis

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Table E-1
Prairie Island DECON Unit 1
100 Years of Spent Fuel Storage Decommissioning Cost Estimate
(Thousands of 2014 Dollars)

Activity Index	Activity Description	Decon Cost	Removal Cost	Packaging Costs	Transport Costs	Off-Site Processing Costs	LLRW Disposal Costs	Other Costs	Total Contingency	Total Costs	NRC Lic. Term. Costs	Spent Fuel Management Costs	Site Restoration Costs	Processed Volume Cu. Feet	Burial Volumes				Burial / Processed Wt., Lbs.	Craft Manhours	Utility and Contractor Manhours
															Class A Cu. Feet	Class B Cu. Feet	Class C Cu. Feet	GTCC Cu. Feet			
PERIOD 1a - Shutdown through Transition																					
Period 1a Direct Decommissioning Activities																					
1a.1.1	Prepare preliminary decommissioning cost	-	-	-	-	-	-	148	22	170	170	-	-	-	-	-	-	-	-	-	1,300
1a.1.2	Notification of Cessation of Operations									a											
1a.1.3	Remove fuel & source material									n/a											
1a.1.4	Notification of Permanent Defueling									a											
1a.1.5	Deactivate plant systems & process waste									a											
1a.1.6	Prepare and submit PSDAR	-	-	-	-	-	-	227	34	261	261	-	-	-	-	-	-	-	-	-	2,000
1a.1.7	Review plant dwgs & specs.	-	-	-	-	-	-	522	78	601	601	-	-	-	-	-	-	-	-	-	4,600
1a.1.8	Perform detailed rad survey									a											
1a.1.9	Estimate by-product inventory	-	-	-	-	-	-	114	17	131	131	-	-	-	-	-	-	-	-	-	1,000
1a.1.10	End product description	-	-	-	-	-	-	114	17	131	131	-	-	-	-	-	-	-	-	-	1,000
1a.1.11	Detailed by-product inventory	-	-	-	-	-	-	148	22	170	170	-	-	-	-	-	-	-	-	-	1,300
1a.1.12	Define major work sequence	-	-	-	-	-	-	851	128	979	979	-	-	-	-	-	-	-	-	-	7,500
1a.1.13	Perform SER and EA	-	-	-	-	-	-	352	53	405	405	-	-	-	-	-	-	-	-	-	3,100
1a.1.14	Perform Site-Specific Cost Study	-	-	-	-	-	-	568	85	653	653	-	-	-	-	-	-	-	-	-	5,000
1a.1.15	Prepare/submit License Termination Plan	-	-	-	-	-	-	465	70	535	535	-	-	-	-	-	-	-	-	-	4,096
1a.1.16	Receive NRC approval of termination plan									a											
Activity Specifications																					
1a.1.17.1	Plant & temporary facilities	-	-	-	-	-	-	559	84	642	578	-	64	-	-	-	-	-	-	-	4,920
1a.1.17.2	Plant systems	-	-	-	-	-	-	473	71	544	490	-	54	-	-	-	-	-	-	-	4,167
1a.1.17.3	NSSS Decontamination Flush	-	-	-	-	-	-	57	9	65	65	-	-	-	-	-	-	-	-	-	500
1a.1.17.4	Reactor internals	-	-	-	-	-	-	806	121	927	927	-	-	-	-	-	-	-	-	-	7,100
1a.1.17.5	Reactor vessel	-	-	-	-	-	-	738	111	849	849	-	-	-	-	-	-	-	-	-	6,500
1a.1.17.6	Biological shield	-	-	-	-	-	-	57	9	65	65	-	-	-	-	-	-	-	-	-	500
1a.1.17.7	Steam generators	-	-	-	-	-	-	354	53	407	407	-	-	-	-	-	-	-	-	-	3,120
1a.1.17.8	Reinforced concrete	-	-	-	-	-	-	182	27	209	104	-	104	-	-	-	-	-	-	-	1,600
1a.1.17.9	Main Turbine	-	-	-	-	-	-	45	7	52	-	-	52	-	-	-	-	-	-	-	400
1a.1.17.10	Main Condensers	-	-	-	-	-	-	45	7	52	-	-	52	-	-	-	-	-	-	-	400
1a.1.17.11	Plant structures & buildings	-	-	-	-	-	-	354	53	407	204	-	204	-	-	-	-	-	-	-	3,120
1a.1.17.12	Waste management	-	-	-	-	-	-	522	78	601	601	-	-	-	-	-	-	-	-	-	4,600
1a.1.17.13	Facility & site closeout	-	-	-	-	-	-	102	15	118	59	-	59	-	-	-	-	-	-	-	900
1a.1.17	Total	-	-	-	-	-	-	4,294	644	4,939	4,349	-	590	-	-	-	-	-	-	-	37,827
Planning & Site Preparations																					
1a.1.18	Prepare dismantling sequence	-	-	-	-	-	-	272	41	313	313	-	-	-	-	-	-	-	-	-	2,400
1a.1.19	Plant prep. & temp. svces	-	-	-	-	-	-	3,000	450	3,450	3,450	-	-	-	-	-	-	-	-	-	-
1a.1.20	Design water clean-up system	-	-	-	-	-	-	159	24	183	183	-	-	-	-	-	-	-	-	-	1,400
1a.1.21	Rigging/Cont. Cntrl Envlps/tooling/etc.	-	-	-	-	-	-	2,300	345	2,645	2,645	-	-	-	-	-	-	-	-	-	-
1a.1.22	Procure casks/liners & containers	-	-	-	-	-	-	140	21	161	161	-	-	-	-	-	-	-	-	-	1,230
1a.1	Subtotal Period 1a Activity Costs	-	-	-	-	-	-	13,673	2,051	15,724	15,134	-	590	-	-	-	-	-	-	-	73,753
Period 1a Additional Costs																					
1a.2.1	Spent Fuel Pool Isolation	-	-	-	-	-	-	10,813	1,622	12,434	12,434	-	-	-	-	-	-	-	-	-	-
1a.2	Subtotal Period 1a Additional Costs	-	-	-	-	-	-	10,813	1,622	12,434	12,434	-	-	-	-	-	-	-	-	-	-
Period 1a Collateral Costs																					
1a.3	Subtotal Period 1a Collateral Costs	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Period 1a Period-Dependent Costs																					
1a.4.1	Insurance	-	-	-	-	-	-	1,096	110	1,205	1,205	-	-	-	-	-	-	-	-	-	-
1a.4.2	Property taxes	-	-	-	-	-	-	1,580	158	1,738	1,738	-	-	-	-	-	-	-	-	-	-
1a.4.3	Health physics supplies	-	490	-	-	-	-	-	123	613	613	-	-	-	-	-	-	-	-	-	-
1a.4.4	Heavy equipment rental	-	528	-	-	-	-	-	79	608	608	-	-	-	-	-	-	-	-	-	-
1a.4.5	Disposal of DAW generated	-	-	13	4	-	48	-	14	79	79	-	-	-	610	-	-	-	12,190	20	-
1a.4.6	Plant energy budget	-	-	-	-	-	-	3,091	464	3,554	3,554	-	-	-	-	-	-	-	-	-	-
1a.4.7	NRC Fees	-	-	-	-	-	-	1,181	118	1,299	1,299	-	-	-	-	-	-	-	-	-	-
1a.4.8	Emergency Planning Fees	-	-	-	-	-	-	1,484	148	1,632	-	1,632	-	-	-	-	-	-	-	-	-
1a.4.9	Fixed Overhead	-	-	-	-	-	-	1,503	225	1,728	1,728	-	-	-	-	-	-	-	-	-	-
1a.4.10	Spent Fuel Pool O&M	-	-	-	-	-	-	396	59	455	-	455	-	-	-	-	-	-	-	-	-
1a.4.11	ISFSI Operating Costs	-	-	-	-	-	-	48	7	55	-	55	-	-	-	-	-	-	-	-	-
1a.4.12	Railroad Track Maintenance	-	-	-	-	-	-	53	8	61	-	-	61	-	-	-	-	-	-	-	-
1a.4.13	Security Staff Cost	-	-	-	-	-	-	394	59	453	453	-	-	-	-	-	-	-	-	-	12,264
1a.4.14	Utility Staff Cost	-	-	-	-	-	-	21,482	3,222	24,705	24,705	-	-	-	-	-	-	-	-	-	423,400
1a.4	Subtotal Period 1a Period-Dependent Costs	-	1,018	13	4	-	48	32,307	4,795	38,185	35,981	2,142	61	-	610	-	-	-	12,190	20	435,664
1a.0	TOTAL PERIOD 1a COST	-	1,018	13	4	-	48	56,793	8,468	66,343	63,550	2,142	651	-	610	-	-	-	12,190	20	509,417

*Prairie Island Nuclear Nuclear Generating Plant
Decommissioning Cost Analysis*

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Table E-1
Prairie Island DECON Unit 1
100 Years of Spent Fuel Storage Decommissioning Cost Estimate
(Thousands of 2014 Dollars)

Activity Index	Activity Description	Decon Cost	Removal Cost	Packaging Costs	Transport Costs	Off-Site Processing Costs	LLRW Disposal Costs	Other Costs	Total Contingency	Total Costs	NRC Lic. Term. Costs	Spent Fuel Management Costs	Site Restoration Costs	Processed Volume Cu. Feet	Burial Volumes				Burial / Processed Wt., Lbs.	Craft Manhours	Utility and Contractor Manhours
															Class A Cu. Feet	Class B Cu. Feet	Class C Cu. Feet	GTCC Cu. Feet			
PERIOD 2a - Large Component Removal																					
Period 2a Direct Decommissioning Activities																					
Nuclear Steam Supply System Removal																					
2a.1.1.1	Reactor Coolant Piping	45	38	6	8	-	144	-	70	313	313	-	-	-	305	-	-	-	34,809	1,414	-
2a.1.1.2	Pressurizer Relief Tank	20	17	4	5	-	88	-	37	172	172	-	-	-	192	-	-	-	21,288	625	-
2a.1.1.3	Reactor Coolant Pumps & Motors	48	56	98	86	-	711	-	238	1,238	1,238	-	-	-	2,332	-	-	-	295,800	2,049	100
2a.1.1.4	Pressurizer	43	64	459	88	-	669	-	264	1,587	1,587	-	-	-	2,196	-	-	-	185,015	2,355	938
2a.1.1.5	Steam Generators	199	2,924	2,014	1,728	1,205	3,449	-	2,334	13,853	13,853	-	-	18,672	11,316	-	-	-	1,668,341	11,617	2,875
2a.1.1.6	CRDMs/ICIs/Service Structure Removal	253	238	210	48	-	736	-	398	1,884	1,884	-	-	-	4,797	-	-	-	177,400	8,104	-
2a.1.1.7	Reactor Vessel Internals	69	2,629	24,947	1,032	-	7,677	255	12,378	48,987	48,987	-	-	-	501	125	673	-	164,922	22,200	1,020
2a.1.1.8	Reactor Vessel	79	4,539	1,669	710	-	1,890	255	5,022	14,163	14,163	-	-	-	5,690	-	-	-	570,074	22,200	1,020
2a.1.1	Totals	756	10,505	29,408	3,705	1,205	15,365	510	20,742	82,195	82,195	-	-	18,672	27,330	125	673	-	3,117,649	70,563	5,953
Removal of Major Equipment																					
2a.1.2	Main Turbine/Generator	-	272	180	58	263	296	-	208	1,277	1,277	-	-	2,131	1,187	-	-	-	206,316	4,667	-
2a.1.3	Main Condensers	-	2,284	115	51	352	435	-	752	3,989	3,989	-	-	3,800	1,587	-	-	-	275,903	39,151	-
Cascading Costs from Clean Building Demolition																					
2a.1.4.1	Reactor	-	991	-	-	-	-	-	149	1,140	1,140	-	-	-	-	-	-	-	-	11,181	-
2a.1.4	Totals	-	991	-	-	-	-	-	149	1,140	1,140	-	-	-	-	-	-	-	-	11,181	-
Disposal of Plant Systems																					
2a.1.5.1	Air Removal	-	25	-	-	-	-	-	4	29	-	-	29	-	-	-	-	-	-	452	-
2a.1.5.2	Auxiliary Feedwater	-	37	-	-	-	-	-	6	42	-	-	42	-	-	-	-	-	-	670	-
2a.1.5.3	Auxiliary Feedwater - RCA	-	37	0	1	18	-	-	12	69	69	-	-	215	-	-	-	-	8,722	601	-
2a.1.5.4	Bleed Steam	-	72	-	-	-	-	-	11	83	-	-	83	-	-	-	-	-	-	1,335	-
2a.1.5.5	Caustic Addition - RCA	-	30	0	1	19	-	-	11	63	63	-	-	233	-	-	-	-	9,453	444	-
2a.1.5.6	Chemical Feed	-	16	-	-	-	-	-	2	18	-	-	18	-	-	-	-	-	-	304	-
2a.1.5.7	Chemical Feed - RCA	-	1	0	0	1	-	-	0	2	2	-	-	6	-	-	-	-	243	12	-
2a.1.5.8	Circulating Water	-	34	-	-	-	-	-	5	39	-	-	39	-	-	-	-	-	-	619	-
2a.1.5.9	Condensate	-	382	-	-	-	-	-	57	440	-	-	440	-	-	-	-	-	-	6,837	-
2a.1.5.10	Condensate Polishing	-	189	-	-	-	-	-	28	218	-	-	218	-	-	-	-	-	-	3,420	-
2a.1.5.11	Condensate Polishing - RCA	-	148	3	13	174	-	-	65	403	403	-	-	2,078	-	-	-	-	84,395	2,329	-
2a.1.5.12	Electro-hydraulic	-	7	-	-	-	-	-	1	8	-	-	8	-	-	-	-	-	-	127	-
2a.1.5.13	Feedwater	-	123	-	-	-	-	-	18	141	-	-	141	-	-	-	-	-	-	2,215	-
2a.1.5.14	Feedwater - RCA	-	157	5	20	268	-	-	83	533	533	-	-	3,208	-	-	-	-	130,294	2,651	-
2a.1.5.15	Gland Seal	-	27	-	-	-	-	-	4	31	-	-	31	-	-	-	-	-	-	505	-
2a.1.5.16	Heater Drain	-	321	-	-	-	-	-	48	370	-	-	370	-	-	-	-	-	-	5,881	-
2a.1.5.17	Internal Circ Water & CDSR	-	21	-	-	-	-	-	3	25	-	-	25	-	-	-	-	-	-	389	-
2a.1.5.18	Main Gen/Exciter/Transformer	-	0	-	-	-	-	-	0	0	-	-	0	-	-	-	-	-	-	5	-
2a.1.5.19	Main Steam	-	93	-	-	-	-	-	14	107	-	-	107	-	-	-	-	-	-	1,690	-
2a.1.5.20	Main Steam - RCA	-	295	8	31	422	-	-	143	899	899	-	-	5,044	-	-	-	-	204,825	4,956	-
2a.1.5.21	Steam Generator Blowdown	-	387	20	23	170	188	-	175	963	963	-	-	2,031	686	-	-	-	127,773	6,667	-
2a.1.5.22	Steam Generators	-	4	-	-	-	-	-	1	5	-	-	5	-	-	-	-	-	-	75	-
2a.1.5.23	Turbine & Moisture Separators	-	312	-	-	-	-	-	47	358	-	-	358	-	-	-	-	-	-	5,609	-
2a.1.5.24	Turbine Oil Purification	-	57	-	-	-	-	-	8	65	-	-	65	-	-	-	-	-	-	1,003	-
2a.1.5	Totals	-	2,776	37	90	1,072	188	-	747	4,910	2,931	-	1,979	12,815	686	-	-	-	565,705	48,794	-
2a.1.6	Scaffolding in support of decommissioning	-	772	3	1	13	3	-	196	988	988	-	-	138	12	-	-	-	7,016	6,368	-
2a.1	Subtotal Period 2a Activity Costs	756	17,600	29,743	3,905	2,905	16,287	510	22,793	94,499	92,520	-	1,979	37,556	30,801	125	673	-	4,172,589	180,724	5,953
Period 2a Additional Costs																					
2a.2.1	Remedial Action Surveys	-	-	-	-	-	-	1,299	390	1,689	1,689	-	-	-	-	-	-	-	-	26,595	-
2a.2	Subtotal Period 2a Additional Costs	-	-	-	-	-	-	1,299	390	1,689	1,689	-	-	-	-	-	-	-	-	26,595	-
Period 2a Collateral Costs																					
2a.3.1	Process decommissioning water waste	47	-	31	79	-	135	-	72	365	365	-	-	-	303	-	-	-	18,203	59	-
2a.3.2	Process decommissioning chemical flush waste	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2a.3.3	Small tool allowance	-	195	-	-	-	-	-	29	224	202	-	22	-	-	-	-	-	-	-	-
2a.3.4	Spent Fuel Capital and Transfer	-	-	-	-	-	-	17,811	2,672	20,482	-	20,482	-	-	-	-	-	-	-	-	-
2a.3.5	On-site survey and release of 0.0 tons clean metallic waste	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2a.3	Subtotal Period 2a Collateral Costs	47	195	31	79	-	135	17,811	2,773	21,071	567	20,482	22	-	303	-	-	-	18,203	59	-

*Prairie Island Nuclear Nuclear Generating Plant
Decommissioning Cost Analysis*

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Table E-1
Prairie Island DECON Unit 1
100 Years of Spent Fuel Storage Decommissioning Cost Estimate
(Thousands of 2014 Dollars)

Activity		Decon Cost	Removal Cost	Packaging Costs	Transport Costs	Off-Site Processing Costs	LLRW Disposal Costs	Other Costs	Total Contingency	Total Costs	NRC Lic. Term. Costs	Spent Fuel Management Costs	Site Restoration Costs	Processed Volume Cu. Feet	Burial Volumes				Burial / Processed Wt., Lbs.	Craft Manhours	Utility and Contractor Manhours
Index	Activity Description														Class A Cu. Feet	Class B Cu. Feet	Class C Cu. Feet	GTCC Cu. Feet			
Decontamination of Site Buildings																					
2b.1.3.1	Reactor	1,009	2,385	127	871	187	10,692	-	3,945	19,215	19,215	-	-	2,230	57,414	-	-	-	3,559,624	50,842	-
2b.1.3.2	Backwash Waste Receiving Tank	-	25	1	12	-	84	-	29	151	151	-	-	-	507	-	-	-	43,896	299	-
2b.1.3	Totals	1,009	2,409	128	883	187	10,776	-	3,974	19,365	19,365	-	-	2,230	57,921	-	-	-	3,603,520	51,140	-
2b.1	Subtotal Period 2b Activity Costs	2,511	14,258	511	1,532	6,692	13,718	-	9,317	48,539	46,040	-	2,498	79,974	68,664	-	-	-	7,470,455	264,930	-
Period 2b Additional Costs																					
2b.2.1	Remedial Action Surveys	-	-	-	-	-	-	1,243	373	1,616	1,616	-	-	-	-	-	-	-	-	25,456	-
2b.2.2	Operational Equipment	-	-	9	31	302	-	-	51	391	391	-	-	5,855	-	-	-	-	146,375	16	-
2b.2	Subtotal Period 2b Additional Costs	-	-	9	31	302	-	1,243	424	2,008	2,008	-	-	5,855	-	-	-	-	146,375	25,472	-
Period 2b Collateral Costs																					
2b.3.1	Process decommissioning water waste	105	-	70	179	-	304	-	162	821	821	-	-	-	684	-	-	-	41,028	133	-
2b.3.2	Process decommissioning chemical flush waste	2	-	86	315	-	691	-	230	1,324	1,324	-	-	-	875	-	-	-	93,252	164	-
2b.3.3	Small tool allowance	-	246	-	-	-	-	-	37	283	283	-	-	-	-	-	-	-	-	-	-
2b.3.4	Spent Fuel Capital and Transfer	-	-	-	-	-	-	9,202	1,380	10,583	-	10,583	-	-	-	-	-	-	-	-	-
2b.3.5	On-site survey and release of 0.0 tons clean metallic waste	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2b.3	Subtotal Period 2b Collateral Costs	107	246	155	494	-	995	9,202	1,809	13,010	2,427	10,583	-	-	1,559	-	-	-	134,280	297	-
Period 2b Period-Dependent Costs																					
2b.4.1	Decon supplies	373	-	-	-	-	-	-	93	466	466	-	-	-	-	-	-	-	-	-	-
2b.4.2	Insurance	-	-	-	-	-	-	612	61	674	674	-	-	-	-	-	-	-	-	-	-
2b.4.3	Property taxes	-	-	-	-	-	-	1,828	183	2,011	2,011	-	-	-	-	-	-	-	-	-	-
2b.4.4	Health physics supplies	-	1,874	-	-	-	-	-	468	2,342	2,342	-	-	-	-	-	-	-	-	-	-
2b.4.5	Heavy equipment rental	-	2,462	-	-	-	-	-	369	2,831	2,831	-	-	-	-	-	-	-	-	-	-
2b.4.6	Disposal of DAW generated	-	-	75	24	-	283	-	82	464	464	-	-	-	3,601	-	-	-	72,026	117	-
2b.4.7	Plant energy budget	-	-	-	-	-	-	2,839	426	3,265	3,265	-	-	-	-	-	-	-	-	-	-
2b.4.8	NRC Fees	-	-	-	-	-	-	767	77	844	844	-	-	-	-	-	-	-	-	-	-
2b.4.9	Emergency Planning Fees	-	-	-	-	-	-	1,454	145	1,600	-	1,600	-	-	-	-	-	-	-	-	-
2b.4.10	Fixed Overhead	-	-	-	-	-	-	1,501	225	1,726	1,726	-	-	-	-	-	-	-	-	-	-
2b.4.11	Spent Fuel Pool O&M	-	-	-	-	-	-	484	73	557	-	557	-	-	-	-	-	-	-	-	-
2b.4.12	Liquid Radwaste Processing Equipment/Services	-	-	-	-	-	-	245	37	282	282	-	-	-	-	-	-	-	-	-	-
2b.4.13	ISFSI Operating Costs	-	-	-	-	-	-	58	9	67	-	67	-	-	-	-	-	-	-	-	-
2b.4.14	Railroad Track Maintenance	-	-	-	-	-	-	65	10	75	-	-	75	-	-	-	-	-	-	-	-
2b.4.15	Security Staff Cost	-	-	-	-	-	-	452	68	520	520	-	-	-	-	-	-	-	-	-	14,049
2b.4.16	DOC Staff Cost	-	-	-	-	-	-	9,515	1,427	10,943	10,943	-	-	-	-	-	-	-	-	-	137,931
2b.4.17	Utility Staff Cost	-	-	-	-	-	-	12,873	1,931	14,804	14,804	-	-	-	-	-	-	-	-	-	256,706
2b.4	Subtotal Period 2b Period-Dependent Costs	373	4,336	75	24	-	283	32,695	5,684	43,470	41,171	2,224	75	-	3,601	-	-	-	72,026	117	408,686
2b.0	TOTAL PERIOD 2b COST	2,991	18,840	749	2,081	6,994	14,996	43,141	17,234	107,027	91,646	12,807	2,574	85,829	73,824	-	-	-	7,823,135	290,816	408,686
PERIOD 2c - Spent fuel delay prior to SFP decon																					
Period 2c Direct Decommissioning Activities																					
Period 2c Collateral Costs																					
2c.3.1	Spent Fuel Capital and Transfer	-	-	-	-	-	-	73,952	11,093	85,044	-	85,044	-	-	-	-	-	-	-	-	-
2c.3	Subtotal Period 2c Collateral Costs	-	-	-	-	-	-	73,952	11,093	85,044	-	85,044	-	-	-	-	-	-	-	-	-
Period 2c Period-Dependent Costs																					
2c.4.1	Insurance	-	-	-	-	-	-	6,112	611	6,723	6,723	-	-	-	-	-	-	-	-	-	-
2c.4.2	Property taxes	-	-	-	-	-	-	13,611	1,361	14,972	14,972	-	-	-	-	-	-	-	-	-	-
2c.4.3	Health physics supplies	-	2,097	-	-	-	-	-	524	2,622	2,622	-	-	-	-	-	-	-	-	-	-
2c.4.4	Disposal of DAW generated	-	-	95	31	-	359	-	104	589	589	-	-	-	4,572	-	-	-	91,449	149	-
2c.4.5	Plant energy budget	-	-	-	-	-	-	7,557	1,134	8,690	8,690	-	-	-	-	-	-	-	-	-	-
2c.4.6	NRC Fees	-	-	-	-	-	-	3,537	354	3,891	3,891	-	-	-	-	-	-	-	-	-	-
2c.4.7	Emergency Planning Fees	-	-	-	-	-	-	14,516	1,452	15,968	-	15,968	-	-	-	-	-	-	-	-	-
2c.4.8	Fixed Overhead	-	-	-	-	-	-	14,984	2,248	17,231	17,231	-	-	-	-	-	-	-	-	-	-
2c.4.9	Spent Fuel Pool O&M	-	-	-	-	-	-	4,835	725	5,561	-	5,561	-	-	-	-	-	-	-	-	-
2c.4.10	Liquid Radwaste Processing Equipment/Services	-	-	-	-	-	-	245	37	282	282	-	-	-	-	-	-	-	-	-	-
2c.4.11	ISFSI Operating Costs	-	-	-	-	-	-	584	88	671	-	671	-	-	-	-	-	-	-	-	-
2c.4.12	Railroad Track Maintenance	-	-	-	-	-	-	652	98	750	-	-	750	-	-	-	-	-	-	-	-
2c.4.13	Utility Staff Cost	-	-	-	-	-	-	8,982	1,347	10,329	5,165	5,165	-	-	-	-	-	-	-	-	191,229
2c.4	Subtotal Period 2c Period-Dependent Costs	-	2,097	95	31	-	359	75,615	10,082	88,280	60,166	27,364	750	-	4,572	-	-	-	91,449	149	191,229
2c.0	TOTAL PERIOD 2c COST	-	2,097	95	31	-	359	149,567	21,175	173,324	60,166	112,409	750	-	4,572	-	-	-	91,449	149	191,229

Prairie Island Nuclear Nuclear Generating Plant
Decommissioning Cost Analysis

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Table E-1
Prairie Island DECON Unit 1
100 Years of Spent Fuel Storage Decommissioning Cost Estimate
(Thousands of 2014 Dollars)

Activity Index	Activity Description	Decon Cost	Removal Cost	Packaging Costs	Transport Costs	Off-Site Processing Costs	LLRW Disposal Costs	Other Costs	Total Contingency	Total Costs	NRC Lic. Term. Costs	Spent Fuel Management Costs	Site Restoration Costs	Processed Volume Cu. Feet	Burial Volumes				Burial / Processed Wt., Lbs.	Craft Manhours	Utility and Contractor Manhours
															Class A Cu. Feet	Class B Cu. Feet	Class C Cu. Feet	GTCC Cu. Feet			
PERIOD 2d - Decontamination Following Wet Fuel Storage																					
Period 2d Direct Decommissioning Activities																					
2d.1.1	Remove spent fuel racks	287	29	90	32	-	574	-	308	1,320	1,320	-	-	-	2,092	-	-	-	138,298	576	-
Disposal of Plant Systems																					
2d.1.2.1	Electrical - Contaminated - Fuel Pool	-	121	1	4	51	6	-	40	225	225	-	-	615	23	-	-	-	26,508	2,077	-
2d.1.2.2	Electrical - Decontaminated - Fuel Pool	-	747	9	37	493	-	-	267	1,553	1,553	-	-	5,893	-	-	-	-	239,327	12,340	-
2d.1.2.3	HVAC - Contaminated - Fuel Pool	-	135	3	9	117	14	-	57	336	336	-	-	1,398	53	-	-	-	60,246	2,157	-
2d.1.2.4	Safeguards Chilled Water - RCA	-	69	1	3	41	-	-	24	138	138	-	-	495	-	-	-	-	20,100	1,019	-
2d.1.2.5	Spent Fuel Pool Cooling	257	289	32	26	67	364	-	309	1,346	1,346	-	-	806	1,325	-	-	-	120,439	7,613	-
2d.1.2.6	Station & Instrument Air - RCA Fuel Pool	-	16	0	1	7	-	-	5	29	29	-	-	83	-	-	-	-	3,374	263	-
2d.1.2	Totals	257	1,378	47	79	777	385	-	703	3,627	3,627	-	-	9,290	1,401	-	-	-	469,994	25,468	-
Decontamination of Site Buildings																					
2d.1.3	Totals	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2d.1.4	Scaffolding in support of decommissioning	-	193	1	0	3	1	-	49	247	247	-	-	35	3	-	-	-	1,754	1,592	-
2d.1	Subtotal Period 2d Activity Costs	544	1,600	138	112	780	960	-	1,060	5,193	5,193	-	-	9,325	3,496	-	-	-	610,046	27,637	-
Period 2d Additional Costs																					
2d.2.1	License Termination Survey Planning	-	-	-	-	-	-	547	164	711	711	-	-	-	-	-	-	-	-	-	6,240
2d.2.2	Remedial Action Surveys	-	-	-	-	-	-	793	238	1,031	1,031	-	-	-	-	-	-	-	-	16,230	-
2d.2	Subtotal Period 2d Additional Costs	-	-	-	-	-	-	1,339	402	1,741	1,741	-	-	-	-	-	-	-	-	16,230	6,240
Period 2d Collateral Costs																					
2d.3.1	Process decommissioning water waste	10	-	8	22	-	37	-	18	96	96	-	-	-	83	-	-	-	4,994	16	-
2d.3.2	Process decommissioning chemical flush waste	1	-	32	117	-	256	-	85	491	491	-	-	-	324	-	-	-	34,576	61	-
2d.3.3	Small tool allowance	-	30	-	-	-	-	-	4	34	34	-	-	-	-	-	-	-	-	-	-
2d.3.4	Decommissioning Equipment Disposition	-	-	137	59	556	145	-	142	1,039	1,039	-	-	6,000	529	-	-	-	304,968	88	-
2d.3.5	Spent Fuel Capital and Transfer	-	-	-	-	-	-	3,528	529	4,057	-	4,057	-	-	-	-	-	-	-	-	-
2d.3	Subtotal Period 2d Collateral Costs	11	30	177	197	556	438	3,528	779	5,716	1,660	4,057	-	6,000	937	-	-	-	344,538	165	-
Period 2d Period-Dependent Costs																					
2d.4.1	Decon supplies	42	-	-	-	-	-	-	10	52	52	-	-	-	-	-	-	-	-	-	-
2d.4.2	Insurance	-	-	-	-	-	-	390	39	429	429	-	-	-	-	-	-	-	-	-	-
2d.4.3	Property taxes	-	-	-	-	-	-	579	58	637	637	-	-	-	-	-	-	-	-	-	-
2d.4.4	Health physics supplies	-	533	-	-	-	-	-	133	666	666	-	-	-	-	-	-	-	-	-	-
2d.4.5	Heavy equipment rental	-	1,570	-	-	-	-	-	235	1,805	1,805	-	-	-	-	-	-	-	-	-	-
2d.4.6	Disposal of DAW generated	-	-	17	6	-	65	-	19	107	107	-	-	-	830	-	-	-	16,609	27	-
2d.4.7	Plant energy budget	-	-	-	-	-	-	965	145	1,110	1,110	-	-	-	-	-	-	-	-	-	-
2d.4.8	NRC Fees	-	-	-	-	-	-	416	42	457	457	-	-	-	-	-	-	-	-	-	-
2d.4.9	Emergency Planning Fees	-	-	-	-	-	-	927	93	1,020	-	1,020	-	-	-	-	-	-	-	-	-
2d.4.10	Fixed Overhead	-	-	-	-	-	-	957	144	1,101	1,101	-	-	-	-	-	-	-	-	-	-
2d.4.11	Liquid Radwaste Processing Equipment/Services	-	-	-	-	-	-	313	47	360	360	-	-	-	-	-	-	-	-	-	-
2d.4.12	ISFSI Operating Costs	-	-	-	-	-	-	37	6	43	-	43	-	-	-	-	-	-	-	-	-
2d.4.13	Railroad Track Maintenance	-	-	-	-	-	-	42	6	48	-	-	48	-	-	-	-	-	-	-	-
2d.4.14	Security Staff Cost	-	-	-	-	-	-	1,074	161	1,235	1,235	-	-	-	-	-	-	-	-	-	29,526
2d.4.15	DOC Staff Cost	-	-	-	-	-	-	5,091	764	5,855	5,855	-	-	-	-	-	-	-	-	-	70,436
2d.4.16	Utility Staff Cost	-	-	-	-	-	-	6,818	1,023	7,841	7,841	-	-	-	-	-	-	-	-	-	127,029
2d.4	Subtotal Period 2d Period-Dependent Costs	42	2,102	17	6	-	65	17,610	2,924	22,766	21,656	1,063	48	-	830	-	-	-	16,609	27	226,990
2d.0	TOTAL PERIOD 2d COST	597	3,732	332	315	1,337	1,463	22,477	5,165	35,417	30,250	5,120	48	15,325	5,263	-	-	-	971,193	44,059	233,230
PERIOD 2f - License Termination																					
Period 2f Direct Decommissioning Activities																					
2f.1.1	ORISE confirmatory survey	-	-	-	-	-	-	163	49	212	212	-	-	-	-	-	-	-	-	-	-
2f.1.2	Terminate license	-	-	-	-	-	-	-	-	a	-	-	-	-	-	-	-	-	-	-	-
2f.1	Subtotal Period 2f Activity Costs	-	-	-	-	-	-	163	49	212	212	-	-	-	-	-	-	-	-	-	-
Period 2f Additional Costs																					
2f.2.1	License Termination Survey	-	-	-	-	-	-	2,489	747	3,236	3,236	-	-	-	-	-	-	-	-	40,172	3,120
2f.2	Subtotal Period 2f Additional Costs	-	-	-	-	-	-	2,489	747	3,236	3,236	-	-	-	-	-	-	-	-	40,172	3,120

Prairie Island Nuclear Nuclear Generating Plant
Decommissioning Cost Analysis

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Table E-1
Prairie Island DECON Unit 1
100 Years of Spent Fuel Storage Decommissioning Cost Estimate
(Thousands of 2014 Dollars)

Activity Index	Activity Description	Decon Cost	Removal Cost	Packaging Costs	Transport Costs	Off-Site Processing Costs	LLRW Disposal Costs	Other Costs	Total Contingency	Total Costs	NRC Lic. Term. Costs	Spent Fuel Management Costs	Site Restoration Costs	Processed Volume Cu. Feet	Burial Volumes				Burial / Processed Wt., Lbs.	Craft Manhours	Utility and Contractor Manhours
															Class A Cu. Feet	Class B Cu. Feet	Class C Cu. Feet	GTCC Cu. Feet			
Period 2f Collateral Costs																					
2f.3.1	DOC staff relocation expenses	-	-	-	-	-	-	1,708	256	1,964	1,964	-	-	-	-	-	-	-	-	-	-
2f.3.2	Spent Fuel Capital and Transfer	-	-	-	-	-	-	2,299	345	2,643	-	2,643	-	-	-	-	-	-	-	-	-
2f.3	Subtotal Period 2f Collateral Costs	-	-	-	-	-	-	4,006	601	4,607	1,964	2,643	-	-	-	-	-	-	-	-	-
Period 2f Period-Dependent Costs																					
2f.4.1	Insurance	-	-	-	-	-	-	344	34	379	379	-	-	-	-	-	-	-	-	-	-
2f.4.2	Property taxes	-	-	-	-	-	-	526	53	578	578	-	-	-	-	-	-	-	-	-	-
2f.4.3	Health physics supplies	-	399	-	-	-	-	-	100	499	499	-	-	-	-	-	-	-	-	-	-
2f.4.4	Disposal of DAW generated	-	-	7	2	-	26	-	8	43	43	-	-	-	334	-	-	-	6,685	11	-
2f.4.5	Plant energy budget	-	-	-	-	-	-	462	69	532	532	-	-	-	-	-	-	-	-	-	-
2f.4.6	NRC Fees	-	-	-	-	-	-	452	45	497	497	-	-	-	-	-	-	-	-	-	-
2f.4.7	Emergency Planning Fees	-	-	-	-	-	-	47	5	52	-	52	-	-	-	-	-	-	-	-	-
2f.4.8	Fixed Overhead	-	-	-	-	-	-	917	138	1,054	1,054	-	-	-	-	-	-	-	-	-	-
2f.4.9	ISFSI Operating Costs	-	-	-	-	-	-	36	5	41	-	41	-	-	-	-	-	-	-	-	-
2f.4.10	Railroad Track Maintenance	-	-	-	-	-	-	40	6	46	-	-	46	-	-	-	-	-	-	-	-
2f.4.11	Security Staff Cost	-	-	-	-	-	-	1,010	151	1,161	1,161	-	-	-	-	-	-	-	-	-	27,690
2f.4.12	DOC Staff Cost	-	-	-	-	-	-	3,451	518	3,969	3,969	-	-	-	-	-	-	-	-	-	46,410
2f.4.13	Utility Staff Cost	-	-	-	-	-	-	3,345	502	3,847	3,847	-	-	-	-	-	-	-	-	-	59,670
2f.4	Subtotal Period 2f Period-Dependent Costs	-	399	7	2	-	26	10,630	1,633	12,698	12,559	93	46	-	334	-	-	-	6,685	11	133,770
2f.0	TOTAL PERIOD 2f COST	-	399	7	2	-	26	17,288	3,030	20,752	17,970	2,737	46	-	334	-	-	-	6,685	40,183	136,890
PERIOD 2 TOTALS		4,460	47,044	31,030	6,438	11,235	33,544	298,305	80,126	512,182	350,359	155,878	5,945	138,709	118,618	125	673	-	13,153,630	582,700	1,570,492
PERIOD 3b - Site Restoration																					
Period 3b Direct Decommissioning Activities																					
Demolition of Remaining Site Buildings																					
3b.1.1.1	Reactor	-	5,733	-	-	-	-	-	860	6,593	-	-	6,593	-	-	-	-	-	-	65,023	-
3b.1.1.2	Condensate Storage Tank Foundation	-	7	-	-	-	-	-	1	8	-	-	8	-	-	-	-	-	-	95	-
3b.1.1.3	Turbine	-	2,598	-	-	-	-	-	390	2,988	-	-	2,988	-	-	-	-	-	-	34,340	-
3b.1.1.4	Turbine Pedestal	-	818	-	-	-	-	-	123	941	-	-	941	-	-	-	-	-	-	7,580	-
3b.1.1	Totals	-	9,157	-	-	-	-	-	1,374	10,530	-	-	10,530	-	-	-	-	-	-	107,039	-
Site Closeout Activities																					
3b.1.2	Grade & landscape site	-	432	-	-	-	-	-	65	497	-	-	497	-	-	-	-	-	-	921	-
3b.1.3	Final report to NRC	-	-	-	-	-	-	177	27	204	204	-	-	-	-	-	-	-	-	-	1,560
3b.1	Subtotal Period 3b Activity Costs	-	9,589	-	-	-	-	177	1,465	11,231	204	-	11,027	-	-	-	-	-	-	107,959	1,560
Period 3b Additional Costs																					
3b.2.1	Concrete Crushing	-	231	-	-	-	-	3	35	268	-	-	268	-	-	-	-	-	-	1,096	-
3b.2.2	Underground Services Excavations	-	830	-	-	-	-	392	183	1,406	-	-	1,406	-	-	-	-	-	-	7,407	-
3b.2.3	Intake Structure cofferdam	-	572	-	-	-	-	-	86	657	-	-	657	-	-	-	-	-	-	5,079	-
3b.2	Subtotal Period 3b Additional Costs	-	1,633	-	-	-	-	395	304	2,332	-	-	2,332	-	-	-	-	-	-	13,582	-
Period 3b Collateral Costs																					
3b.3.1	Small tool allowance	-	117	-	-	-	-	-	17	134	-	-	134	-	-	-	-	-	-	-	-
3b.3.2	Spent Fuel Capital and Transfer	-	-	-	-	-	-	19,000	2,850	21,850	-	21,850	-	-	-	-	-	-	-	-	-
3b.3.3	Fixed Overhead - SR	-	-	-	-	-	-	1,141	171	1,313	-	-	1,313	-	-	-	-	-	-	-	-
3b.3	Subtotal Period 3b Collateral Costs	-	117	-	-	-	-	20,141	3,039	23,297	-	21,850	1,447	-	-	-	-	-	-	-	-
Period 3b Period-Dependent Costs																					
3b.4.1	Insurance	-	-	-	-	-	-	488	49	537	-	537	-	-	-	-	-	-	-	-	-
3b.4.2	Property taxes	-	-	-	-	-	-	1,315	131	1,446	0	1,301	145	-	-	-	-	-	-	-	-
3b.4.3	Heavy equipment rental	-	6,056	-	-	-	-	-	908	6,965	-	-	6,965	-	-	-	-	-	-	-	-
3b.4.4	Plant energy budget	-	-	-	-	-	-	655	98	754	-	-	754	-	-	-	-	-	-	-	-
3b.4.5	NRC ISFSI Fees	-	-	-	-	-	-	385	39	424	-	424	-	-	-	-	-	-	-	-	-
3b.4.6	Emergency Planning Fees	-	-	-	-	-	-	134	13	148	-	148	-	-	-	-	-	-	-	-	-
3b.4.7	ISFSI Operating Costs	-	-	-	-	-	-	101	15	116	-	116	-	-	-	-	-	-	-	-	-
3b.4.8	Railroad Track Maintenance	-	-	-	-	-	-	113	17	130	-	-	130	-	-	-	-	-	-	-	-
3b.4.9	Security Staff Cost	-	-	-	-	-	-	2,738	411	3,148	(0)	2,582	567	-	-	-	-	-	-	-	74,658
3b.4.10	DOC Staff Cost	-	-	-	-	-	-	8,847	1,327	10,174	-	-	10,174	-	-	-	-	-	-	-	117,206
3b.4.11	Utility Staff Cost	-	-	-	-	-	-	4,553	683	5,236	-	943	4,294	-	-	-	-	-	-	-	76,869
3b.4	Subtotal Period 3b Period-Dependent Costs	-	6,056	-	-	-	-	19,330	3,692	29,078	(0)	6,050	23,028	-	-	-	-	-	-	-	268,733
3b.0	TOTAL PERIOD 3b COST	-	17,394	-	-	-	-	40,043	8,500	65,937	204	27,900	37,833	-	-	-	-	-	-	121,542	270,293

Prairie Island Nuclear Nuclear Generating Plant
Decommissioning Cost Analysis

Table E-1
Prairie Island DECON Unit 1
100 Years of Spent Fuel Storage Decommissioning Cost Estimate
(Thousands of 2014 Dollars)

Activity Index	Activity Description	Decon Cost	Removal Cost	Packaging Costs	Transport Costs	Off-Site Processing Costs	LLRW Disposal Costs	Other Costs	Total Contingency	Total Costs	NRC Lic. Term. Costs	Spent Fuel Management Costs	Site Restoration Costs	Processed Volume Cu. Feet	Burial Volumes				Burial / Processed Wt., Lbs.	Craft Manhours	Utility and Contractor Manhours
															Class A Cu. Feet	Class B Cu. Feet	Class C Cu. Feet	GTCC Cu. Feet			
Period 3e Period-Dependent Costs																					
3e.4.1	Insurance	-	-	-	-	-	-	84	21	104	104	-	-	-	-	-	-	-	-	-	-
3e.4.2	Property taxes	-	-	-	-	-	-	185	46	232	232	-	-	-	-	-	-	-	-	-	-
3e.4.3	Plant energy budget	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
3e.4.4	Fixed Overhead	-	-	-	-	-	-	178	45	223	223	-	-	-	-	-	-	-	-	-	-
3e.4.5	Railroad Track Maintenance	-	-	-	-	-	-	18	4	22	-	-	22	-	-	-	-	-	-	-	-
3e.4.6	Security Staff Cost	-	-	-	-	-	-	65	16	81	81	-	-	-	-	-	-	-	-	-	2,510
3e.4.7	Utility Staff Cost	-	-	-	-	-	-	103	26	129	129	-	-	-	-	-	-	-	-	-	1,901
3e.4	Subtotal Period 3e Period-Dependent Costs	-	-	-	-	-	-	633	158	791	769	-	22	-	-	-	-	-	-	-	4,411
3e.0	TOTAL PERIOD 3e COST	-	-	1	0	-	2	1,192	299	1,494	1,471	-	22	-	30	-	-	-	600	2,550	5,239
PERIOD 3f - ISFSI Site Restoration																					
Period 3f Direct Decommissioning Activities																					
Period 3f Additional Costs																					
3f.2.1	Demolition and Site Restoration of ISFSI	-	248	-	-	-	-	28	41	317	-	-	317	-	-	-	-	-	-	1,327	80
3f.2	Subtotal Period 3f Additional Costs	-	248	-	-	-	-	28	41	317	-	-	317	-	-	-	-	-	-	1,327	80
Period 3f Collateral Costs																					
3f.3.1	Small tool allowance	-	2	-	-	-	-	-	0	2	-	-	2	-	-	-	-	-	-	-	-
3f.3	Subtotal Period 3f Collateral Costs	-	2	-	-	-	-	-	0	2	-	-	2	-	-	-	-	-	-	-	-
Period 3f Period-Dependent Costs																					
3f.4.1	Insurance	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
3f.4.2	Property taxes	-	-	-	-	-	-	93	9	103	-	-	103	-	-	-	-	-	-	-	-
3f.4.3	Heavy equipment rental	-	106	-	-	-	-	-	16	121	-	-	121	-	-	-	-	-	-	-	-
3f.4.4	Plant energy budget	-	-	-	-	-	-	52	8	59	-	-	59	-	-	-	-	-	-	-	-
3f.4.5	Fixed Overhead	-	-	-	-	-	-	90	13	103	-	-	103	-	-	-	-	-	-	-	-
3f.4.6	Railroad Track Maintenance	-	-	-	-	-	-	9	1	10	-	-	10	-	-	-	-	-	-	-	-
3f.4.7	Security Staff Cost	-	-	-	-	-	-	33	5	38	-	-	38	-	-	-	-	-	-	-	1,265
3f.4.8	Utility Staff Cost	-	-	-	-	-	-	41	6	47	-	-	47	-	-	-	-	-	-	-	784
3f.4	Subtotal Period 3f Period-Dependent Costs	-	106	-	-	-	-	317	59	481	-	-	481	-	-	-	-	-	-	-	2,050
3f.0	TOTAL PERIOD 3f COST	-	355	-	-	-	-	345	100	801	-	-	801	-	-	-	-	-	-	1,327	2,130
PERIOD 3 TOTALS		-	17,750	1,171	2,136	-	26,148	553,961	88,733	689,898	12,725	638,517	38,656	-	58,461	-	-	3,746	10,100,860	125,418	2,844,685
TOTAL COST TO DECOMMISSION		7,400	69,915	32,577	8,985	11,387	64,678	942,065	185,494	1,322,500	476,522	799,880	46,099	144,842	191,043	713	673	3,746	23,864,630	753,644	5,250,980

TOTAL COST TO DECOMMISSION WITH 16.31% CONTINGENCY:	\$1,322,500	thousands of 2014 dollars
TOTAL NRC LICENSE TERMINATION COST IS 36.03% OR:	\$476,522	thousands of 2014 dollars
SPENT FUEL MANAGEMENT COST IS 60.48% OR:	\$799,880	thousands of 2014 dollars
NON-NUCLEAR DEMOLITION COST IS 3.49% OR:	\$46,099	thousands of 2014 dollars
TOTAL RADWASTE VOLUME BURIED (EXCLUDING GTCC):	192,430	Cubic Feet
TOTAL GREATER THAN CLASS C RADWASTE VOLUME GENERATED:	3,746	Cubic Feet
TOTAL SCRAP METAL REMOVED:	27,780	Tons
TOTAL CRAFT LABOR REQUIREMENTS:	753,644	Man-hours

End Notes:
n/a - indicates that this activity not charged as decommissioning expense.
a - indicates that this activity performed by decommissioning staff.
0 - indicates that this value is less than 0.5 but is non-zero.
a cell containing " - " indicates a zero value

Prairie Island Nuclear Nuclear Generating Plant
Decommissioning Cost Analysis

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Table E-2
Prairie Island DECON Unit 2
100 Years of Spent Fuel Storage Decommissioning Cost Estimate
(Thousands of 2014 Dollars)

Activity Index	Activity Description	Decon Cost	Removal Cost	Packaging Costs	Transport Costs	Off-Site	LLRW	Other Costs	Total Contingency	Total Costs	NRC	Spent Fuel Management Costs	Site Restoration Costs	Processed Volume Cu. Feet	Burial Volumes				Burial / Processed Wt., Lbs.	Craft Manhours	Utility and Contractor Manhours
						Processing Costs	Disposal Costs				Lic. Term. Costs				Class A Cu. Feet	Class B Cu. Feet	Class C Cu. Feet	GTCC Cu. Feet			
PERIOD 2a - Large Component Removal																					
Period 2a Direct Decommissioning Activities																					
Nuclear Steam Supply System Removal																					
2a.1.1.1	Reactor Coolant Piping	45	38	6	8	-	144	-	70	313	313	-	-	-	305	-	-	-	34,809	1,414	-
2a.1.1.2	Pressurizer Relief Tank	20	17	4	5	-	88	-	37	172	172	-	-	-	192	-	-	-	21,288	625	-
2a.1.1.3	Reactor Coolant Pumps & Motors	48	56	98	86	-	711	-	238	1,238	1,238	-	-	-	2,332	-	-	-	295,800	2,049	100
2a.1.1.4	Pressurizer	43	64	459	88	-	669	-	264	1,587	1,587	-	-	-	2,196	-	-	-	185,015	2,355	938
2a.1.1.5	Steam Generators	199	2,924	2,014	1,728	1,205	3,449	-	2,334	13,853	13,853	-	-	18,672	11,316	-	-	-	1,668,341	11,617	2,875
2a.1.1.6	CRDMs/ICIs/Service Structure Removal	253	238	210	48	-	736	-	398	1,884	1,884	-	-	-	4,797	-	-	-	177,400	8,104	-
2a.1.1.7	Reactor Vessel Internals	65	2,533	19,029	960	-	7,116	241	10,524	40,469	40,469	-	-	-	501	125	617	-	146,554	20,867	967
2a.1.1.8	Reactor Vessel	79	4,443	1,563	710	-	1,890	241	4,921	13,847	13,847	-	-	-	5,690	-	-	-	570,074	20,867	967
2a.1.1	Totals	752	10,312	23,385	3,632	1,205	14,804	483	18,787	73,360	73,360	-	-	18,672	27,330	125	617	-	3,099,281	67,896	5,846
Removal of Major Equipment																					
2a.1.2	Main Turbine/Generator	-	272	180	58	263	296	-	208	1,277	1,277	-	-	2,131	1,187	-	-	-	206,316	4,667	-
2a.1.3	Main Condensers	-	2,284	115	51	352	435	-	752	3,989	3,989	-	-	3,800	1,587	-	-	-	275,903	39,151	-
Cascading Costs from Clean Building Demolition																					
2a.1.4.1	Reactor	-	991	-	-	-	-	-	149	1,139	1,139	-	-	-	-	-	-	-	-	11,180	-
2a.1.4.2	Auxiliary	-	425	-	-	-	-	-	64	489	489	-	-	-	-	-	-	-	-	4,945	-
2a.1.4.3	Radwaste	-	15	-	-	-	-	-	2	18	18	-	-	-	-	-	-	-	-	179	-
2a.1.4	Totals	-	1,431	-	-	-	-	-	215	1,646	1,646	-	-	-	-	-	-	-	-	16,304	-
Disposal of Plant Systems																					
2a.1.5.1	Admin Bldg Ventilation	-	5	-	-	-	-	-	1	6	-	-	6	-	-	-	-	-	-	90	-
2a.1.5.2	Air Removal	-	23	-	-	-	-	-	3	27	-	-	27	-	-	-	-	-	-	422	-
2a.1.5.3	Auxiliary Feedwater	-	37	-	-	-	-	-	6	43	-	-	43	-	-	-	-	-	-	676	-
2a.1.5.4	Auxiliary Feedwater - RCA	-	30	0	1	15	-	-	10	56	56	-	-	178	-	-	-	-	7,214	486	-
2a.1.5.5	Bleed Steam	-	72	-	-	-	-	-	11	83	-	-	83	-	-	-	-	-	-	1,331	-
2a.1.5.6	Caustic Addition - RCA	-	32	0	1	20	-	-	11	65	65	-	-	240	-	-	-	-	9,761	468	-
2a.1.5.7	Chemical Feed	-	14	-	-	-	-	-	2	16	-	-	16	-	-	-	-	-	-	261	-
2a.1.5.8	Chemical Feed - RCA	-	2	0	0	1	-	-	1	4	4	-	-	16	-	-	-	-	634	31	-
2a.1.5.9	Circulating Water	-	22	-	-	-	-	-	3	25	-	-	25	-	-	-	-	-	-	401	-
2a.1.5.10	Condensate	-	424	-	-	-	-	-	64	487	-	-	487	-	-	-	-	-	-	7,537	-
2a.1.5.11	Condensate Polishing	-	167	-	-	-	-	-	25	192	-	-	192	-	-	-	-	-	-	2,987	-
2a.1.5.12	Condensate Polishing - RCA	-	31	1	3	40	-	-	14	89	89	-	-	483	-	-	-	-	19,616	493	-
2a.1.5.13	Electro-Hydraulic	-	8	-	-	-	-	-	1	9	-	-	9	-	-	-	-	-	-	143	-
2a.1.5.14	External Circulating Water	-	21	-	-	-	-	-	3	24	-	-	24	-	-	-	-	-	-	385	-
2a.1.5.15	External Circulating Water - RCA	-	58	1	4	60	-	-	24	149	149	-	-	721	-	-	-	-	29,284	938	-
2a.1.5.16	Feedwater	-	102	-	-	-	-	-	15	118	-	-	118	-	-	-	-	-	-	1,840	-
2a.1.5.17	Feedwater - RCA	-	200	6	26	347	-	-	106	685	685	-	-	4,147	-	-	-	-	168,414	3,377	-
2a.1.5.18	Gland Seal	-	27	-	-	-	-	-	4	31	-	-	31	-	-	-	-	-	-	504	-
2a.1.5.19	Heater Drain	-	308	-	-	-	-	-	46	355	-	-	355	-	-	-	-	-	-	5,638	-
2a.1.5.20	Hypobromous Acid Feed	-	5	-	-	-	-	-	1	5	-	-	5	-	-	-	-	-	-	86	-
2a.1.5.21	Hypobromous Acid Feed - RCA	-	1	0	0	0	-	-	0	1	1	-	-	2	-	-	-	-	100	12	-
2a.1.5.22	Internal Circ Water & CDSR	-	20	-	-	-	-	-	3	23	-	-	23	-	-	-	-	-	-	366	-
2a.1.5.23	Main Gen/Exciter/Transformer	-	0	-	-	-	-	-	0	0	-	-	0	-	-	-	-	-	-	5	-
2a.1.5.24	Main Steam	-	81	-	-	-	-	-	12	93	-	-	93	-	-	-	-	-	-	1,482	-
2a.1.5.25	Main Steam - RCA	-	306	8	32	432	-	-	147	926	926	-	-	5,166	-	-	-	-	209,799	5,146	-
2a.1.5.26	Repairable Spare Snubbers	-	5	0	0	1	-	-	1	7	7	-	-	12	-	-	-	-	490	82	-
2a.1.5.27	Steam Exclusion	-	2	-	-	-	-	-	0	2	-	-	2	-	-	-	-	-	-	32	-
2a.1.5.28	Steam Exclusion - RCA	-	3	0	0	2	-	-	1	7	7	-	-	24	-	-	-	-	966	47	-
2a.1.5.29	Steam Generator Blowdown	-	337	19	22	159	173	-	157	867	867	-	-	1,906	631	-	-	-	119,126	5,778	-
2a.1.5.30	Steam Generators	-	4	-	-	-	-	-	1	5	-	-	5	-	-	-	-	-	-	75	-
2a.1.5.31	Turbine & Moisture Separators	-	304	-	-	-	-	-	46	350	-	-	350	-	-	-	-	-	-	5,472	-
2a.1.5.32	Turbine Oil Purification	-	43	-	-	-	-	-	6	49	-	-	49	-	-	-	-	-	-	757	-
2a.1.5.33	Water Treatment	-	363	-	-	-	-	-	54	418	-	-	418	-	-	-	-	-	-	6,677	-
2a.1.5.34	Water Treatment - RCA	-	16	0	1	10	-	-	6	32	32	-	-	115	-	-	-	-	4,652	252	-
2a.1.5	Totals	-	3,075	36	91	1,088	173	-	787	5,250	2,889	-	2,361	13,010	631	-	-	-	570,056	54,280	-
2a.1.6	Scaffolding in support of decommissioning	-	2,504	23	8	94	24	-	650	3,303	3,303	-	-	1,012	89	-	-	-	51,445	26,270	-
2a.1	Subtotal Period 2a Activity Costs	752	19,878	23,738	3,840	3,003	15,733	483	21,398	88,825	86,464	-	2,361	38,625	30,824	125	617	-	4,203,002	208,568	5,846
Period 2a Additional Costs																					
2a.2.1	Remedial Action Surveys	-	-	-	-	-	-	1,249	375	1,624	1,624	-	-	-	-	-	-	-	-	25,570	-
2a.2	Subtotal Period 2a Additional Costs	-	-	-	-	-	-	1,249	375	1,624	1,624	-	-	-	-	-	-	-	-	25,570	-

Table E-2
Prairie Island DECON Unit 2
100 Years of Spent Fuel Storage Decommissioning Cost Estimate
(Thousands of 2014 Dollars)

Activity Index	Activity Description	Decon Cost	Removal Cost	Packaging Costs	Transport Costs	Off-Site Processing Costs	LLRW Disposal Costs	Other Costs	Total Contingency	Total Costs	NRC Lic. Term. Costs	Spent Fuel Management Costs	Site Restoration Costs	Processed Volume Cu. Feet	Burial Volumes				Burial / Processed Wt., Lbs.	Craft Manhours	Utility and Contractor Manhours
															Class A Cu. Feet	Class B Cu. Feet	Class C Cu. Feet	GTCC Cu. Feet			
Period 2a Collateral Costs																					
2a.3.1	Process decommissioning water waste	49	-	32	82	-	140	-	75	378	378	-	-	-	314	-	-	-	18,829	61	-
2a.3.2	Process decommissioning chemical flush waste	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2a.3.3	Small tool allowance	-	219	-	-	-	-	-	33	252	227	-	25	-	-	-	-	-	-	-	-
2a.3.4	Spent Fuel Capital and Transfer	-	-	-	-	-	-	8,802	1,320	10,123	-	10,123	-	-	-	-	-	-	-	-	-
2a.3.5	On-site survey and release of 0.0 tons clean metallic waste	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2a.3	Subtotal Period 2a Collateral Costs	49	219	32	82	-	140	8,802	1,428	10,752	604	10,123	25	-	314	-	-	-	18,829	61	-
Period 2a Period-Dependent Costs																					
2a.4.1	Decon supplies	66	-	-	-	-	-	-	17	83	83	-	-	-	-	-	-	-	-	-	-
2a.4.2	Insurance	-	-	-	-	-	-	615	62	677	677	-	-	-	-	-	-	-	-	-	-
2a.4.3	Property taxes	-	-	-	-	-	-	1,839	184	2,023	1,821	-	202	-	-	-	-	-	-	-	-
2a.4.4	Health physics supplies	-	1,680	-	-	-	-	-	420	2,100	2,100	-	-	-	-	-	-	-	-	-	-
2a.4.5	Heavy equipment rental	-	2,498	-	-	-	-	-	375	2,873	2,873	-	-	-	-	-	-	-	-	-	-
2a.4.6	Disposal of DAW generated	-	-	85	28	-	323	-	94	530	530	-	-	-	4,113	-	-	-	82,265	134	-
2a.4.7	Plant energy budget	-	-	-	-	-	-	3,612	542	4,154	4,154	-	-	-	-	-	-	-	-	-	-
2a.4.8	NRC Fees	-	-	-	-	-	-	536	54	590	590	-	-	-	-	-	-	-	-	-	-
2a.4.9	Emergency Planning Fees	-	-	-	-	-	-	1,461	146	1,607	-	1,607	-	-	-	-	-	-	-	-	-
2a.4.10	Fixed Overhead	-	-	-	-	-	-	1,508	226	1,734	1,734	-	-	-	-	-	-	-	-	-	-
2a.4.11	Spent Fuel Pool O&M	-	-	-	-	-	-	487	73	560	-	560	-	-	-	-	-	-	-	-	-
2a.4.12	ISFSI Operating Costs	-	-	-	-	-	-	59	9	68	-	68	-	-	-	-	-	-	-	-	-
2a.4.13	Railroad Track Maintenance	-	-	-	-	-	-	264	40	304	-	-	304	-	-	-	-	-	-	-	-
2a.4.14	Security Staff Cost	-	-	-	-	-	-	5,611	842	6,452	6,452	-	-	-	-	-	-	-	-	-	162,281
2a.4.15	DOC Staff Cost	-	-	-	-	-	-	14,153	2,123	16,276	16,276	-	-	-	-	-	-	-	-	-	194,994
2a.4.16	Utility Staff Cost	-	-	-	-	-	-	19,180	2,877	22,057	22,057	-	-	-	-	-	-	-	-	-	363,049
2a.4	Subtotal Period 2a Period-Dependent Costs	66	4,178	85	28	-	323	49,325	8,081	62,086	59,346	2,234	506	-	4,113	-	-	-	82,265	134	720,324
2a.0	TOTAL PERIOD 2a COST	867	24,276	23,856	3,950	3,003	16,196	59,859	31,282	163,287	148,038	12,356	2,892	38,625	35,251	125	617	-	4,304,096	234,334	726,171
PERIOD 2b - Site Decontamination																					
Period 2b Direct Decommissioning Activities																					
Disposal of Plant Systems																					
2b.1.1.1	ADT & Misc Ventilation	-	20	0	1	13	2	-	8	45	45	-	-	153	9	-	-	-	6,814	363	-
2b.1.1.2	Aux Bldg Normal Ventilation	-	57	2	5	58	11	-	27	159	159	-	-	692	39	-	-	-	30,671	1,013	-
2b.1.1.3	Aux Bldg Special Ventilation	-	11	0	1	6	2	-	4	24	24	-	-	70	6	-	-	-	3,243	197	-
2b.1.1.4	Battery Rm Special Ventilation	-	1	-	-	-	-	-	0	2	-	-	2	-	-	-	-	-	-	24	-
2b.1.1.5	Boron Recycle	0	3	0	0	0	2	-	2	8	8	-	-	3	9	-	-	-	709	50	-
2b.1.1.6	Chemical & Volume Control	624	762	57	45	197	540	-	679	2,903	2,903	-	-	2,356	1,977	-	-	-	225,854	23,197	-
2b.1.1.7	Cold Chemical Lab Ventilation	-	1	-	-	-	-	-	0	1	-	-	1	-	-	-	-	-	-	9	-
2b.1.1.8	Component Cooling - RCA	-	521	19	75	1,004	-	-	294	1,912	1,912	-	-	11,996	-	-	-	-	487,169	8,583	-
2b.1.1.9	Containment Cooling	-	28	-	-	-	-	-	4	32	-	-	32	-	-	-	-	-	-	502	-
2b.1.1.10	Containment Cooling - RCA	-	242	4	17	229	-	-	98	591	591	-	-	2,743	-	-	-	-	111,390	3,949	-
2b.1.1.11	Containment Hydrogen Control - RCA	-	29	0	1	12	-	-	9	52	52	-	-	141	-	-	-	-	5,742	494	-
2b.1.1.12	Containment Spray - RCA	-	155	2	9	122	-	-	58	346	346	-	-	1,453	-	-	-	-	59,019	2,617	-
2b.1.1.13	Containment Ventilation	-	191	22	40	395	198	-	165	1,011	1,011	-	-	4,721	722	-	-	-	239,450	3,375	-
2b.1.1.14	Control/Relay/Cmptr Rm Vent	-	26	1	2	22	6	-	11	67	67	-	-	260	20	-	-	-	11,915	454	-
2b.1.1.15	Cooling Water	-	128	-	-	-	-	-	19	147	-	-	147	-	-	-	-	-	-	2,344	-
2b.1.1.16	Cooling Water - RCA	-	385	13	52	706	-	-	211	1,368	1,368	-	-	8,442	-	-	-	-	342,822	6,311	-
2b.1.1.17	Cranes/Hoists/Elevators - RCA	-	3	0	1	9	-	-	2	14	14	-	-	103	-	-	-	-	4,184	48	-
2b.1.1.18	D3 Emergency Diesel	-	8	-	-	-	-	-	1	9	-	-	9	-	-	-	-	-	-	141	-
2b.1.1.19	D4 Emergency Diesel	-	8	-	-	-	-	-	1	9	-	-	9	-	-	-	-	-	-	141	-
2b.1.1.20	D5 Emergency Diesel	-	0	-	-	-	-	-	0	0	-	-	0	-	-	-	-	-	-	5	-
2b.1.1.21	Electrical - Clean	-	1,389	-	-	-	-	-	208	1,597	-	-	1,597	-	-	-	-	-	-	24,276	-
2b.1.1.22	Electrical - Contaminated	-	380	4	14	167	21	-	128	714	714	-	-	1,997	75	-	-	-	86,080	6,503	-
2b.1.1.23	Electrical - Decontaminated	-	2,332	29	117	1,569	-	-	839	4,885	4,885	-	-	18,753	-	-	-	-	761,569	38,423	-
2b.1.1.24	Filter Rm Ventilation	-	4	0	0	2	0	-	1	8	8	-	-	24	1	-	-	-	1,020	69	-
2b.1.1.25	Fire Protection & Detection	-	164	-	-	-	-	-	25	188	-	-	188	-	-	-	-	-	-	3,009	-
2b.1.1.26	Fire Protection & Detection - RCA	-	197	3	11	153	-	-	74	438	438	-	-	1,828	-	-	-	-	74,245	3,134	-
2b.1.1.27	Fuel Handling	-	61	1	2	17	14	-	21	116	116	-	-	200	49	-	-	-	11,396	1,101	-
2b.1.1.28	Fuel Oil	-	1	-	-	-	-	-	0	1	-	-	1	-	-	-	-	-	-	9	-
2b.1.1.29	HVAC - Clean	-	121	-	-	-	-	-	18	139	-	-	139	-	-	-	-	-	-	2,373	-
2b.1.1.30	HVAC - Contaminated	-	1,038	24	73	899	111	-	436	2,581	2,581	-	-	10,745	405	-	-	-	463,144	16,579	-
2b.1.1.31	Heating	-	257	-	-	-	-	-	39	296	-	-	296	-	-	-	-	-	-	4,804	-
2b.1.1.32	Heating - RCA	-	270	3	12	160	-	-	93	538	538	-	-	1,907	-	-	-	-	77,458	4,086	-
2b.1.1.33	Hot Lab & Sample Rm Ventilation	-	16	0	1	9	1	-	6	33	33	-	-	107	4	-	-	-	4,632	285	-
2b.1.1.34	Incore Instrumentation	0	24	1	1	5	16	-	11	60	60	-	-	60	58	-	-	-	6,264	458	-
2b.1.1.35	Misc Drains & Vents	-	189	11	9	38	117	-	85	450	450	-	-	458	426	-	-	-	46,850	3,180	-

Table E-2
Prairie Island DECON Unit 2
100 Years of Spent Fuel Storage Decommissioning Cost Estimate
(Thousands of 2014 Dollars)

Activity Index	Activity Description	Decon Cost	Removal Cost	Packaging Costs	Transport Costs	Off-Site Processing Costs	LLRW Disposal Costs	Other Costs	Total Contingency	Total Costs	NRC Lic. Term. Costs	Spent Fuel Management Costs	Site Restoration Costs	Processed Volume Cu. Feet	Burial Volumes				Burial / Processed Wt., Lbs.	Craft Manhours	Utility and Contractor Manhours
															Class A Cu. Feet	Class B Cu. Feet	Class C Cu. Feet	GTCC Cu. Feet			
Disposal of Plant Systems (continued)																					
2b.1.1.36	Misc Lab & Service Areas Vent	-	104	8	6	31	67	-	49	265	265	-	-	370	244	-	-	-	31,186	1,713	-
2b.1.1.37	Miscellaneous Gas	-	58	-	-	-	-	-	9	66	-	-	66	-	-	-	-	-	-	1,073	-
2b.1.1.38	Miscellaneous Gas - RCA	-	107	1	4	50	-	-	35	197	197	-	-	600	-	-	-	-	24,378	1,636	-
2b.1.1.39	Radiation Monitoring	-	6	-	-	-	-	-	1	7	-	-	7	-	-	-	-	-	-	111	-
2b.1.1.40	Radiation Monitoring - RCA	-	52	0	2	26	-	-	17	98	98	-	-	316	-	-	-	-	12,826	782	-
2b.1.1.41	Reactor Coolant	135	190	19	13	19	201	-	172	749	749	-	-	229	730	-	-	-	57,672	5,517	-
2b.1.1.42	Reactor Hot Sampling	116	102	10	5	5	86	-	107	430	430	-	-	54	312	-	-	-	22,919	3,686	-
2b.1.1.43	Reactor Makeup	-	33	-	-	-	-	-	5	38	-	-	38	-	-	-	-	-	-	583	-
2b.1.1.44	Reactor Makeup - RCA	-	3	0	0	2	-	-	1	7	7	-	-	28	-	-	-	-	1,148	47	-
2b.1.1.45	Reactor Vessel	8	14	0	0	2	4	-	9	37	37	-	-	22	14	-	-	-	1,826	385	-
2b.1.1.46	Residual Heat Removal	302	318	81	68	239	891	-	508	2,406	2,406	-	-	2,853	3,244	-	-	-	330,651	7,112	-
2b.1.1.47	Safeguards Chilled Water	-	4	-	-	-	-	-	1	5	-	-	5	-	-	-	-	-	-	75	-
2b.1.1.48	Safety Injection	-	712	38	59	559	317	-	354	2,039	2,039	-	-	6,676	1,161	-	-	-	347,600	12,284	-
2b.1.1.49	Sampling	-	42	3	2	3	26	-	18	94	94	-	-	37	93	-	-	-	7,697	714	-
2b.1.1.50	Service Bldg & New Cmptr Vent	-	0	-	-	-	-	-	0	0	-	-	0	-	-	-	-	-	-	6	-
2b.1.1.51	Shield Bldg Ventilation	-	98	13	20	170	133	-	87	520	520	-	-	2,028	484	-	-	-	114,378	1,743	-
2b.1.1.52	Station & Instrument Air	-	129	-	-	-	-	-	19	148	-	-	148	-	-	-	-	-	-	2,424	-
2b.1.1.53	Station & Instrument Air - RCA	-	240	3	10	136	-	-	82	471	471	-	-	1,625	-	-	-	-	65,986	3,638	-
2b.1.1.54	Turbine Bldg Traps & Drains	-	24	-	-	-	-	-	4	28	-	-	28	-	-	-	-	-	-	462	-
2b.1.1.55	Turbine Bldg Traps & Drains - RCA	-	24	0	1	15	-	-	8	48	48	-	-	180	-	-	-	-	7,321	344	-
2b.1.1.56	Turbine Bldg Ventilation	-	37	-	-	-	-	-	6	43	-	-	43	-	-	-	-	-	-	655	-
2b.1.1.57	Unit Coolers	-	18	-	-	-	-	-	3	21	-	-	21	-	-	-	-	-	-	332	-
2b.1.1.58	Unit Coolers - RCA	-	45	0	1	19	-	-	14	80	80	-	-	232	-	-	-	-	9,413	690	-
2b.1.1.59	Waste Gas Disposal	461	390	39	36	205	368	-	460	1,959	1,959	-	-	2,453	1,358	-	-	-	188,334	14,308	-
2b.1.1.60	Waste Liquid Disposal	1,194	1,455	105	78	306	983	-	1,275	5,397	5,397	-	-	3,655	3,594	-	-	-	385,370	44,485	-
2b.1.1.61	Waste Solid Disposal	96	118	11	8	33	108	-	112	485	485	-	-	389	393	-	-	-	41,732	3,481	-
2b.1.1	Totals	2,936	13,345	528	803	7,610	4,225	-	6,934	36,382	33,604	-	2,777	90,963	15,429	-	-	-	4,712,076	270,390	-
2b.1.2	Scaffolding in support of decommissioning	-	3,130	29	10	117	31	-	812	4,129	4,129	-	-	1,265	112	-	-	-	64,307	32,837	-
Decontamination of Site Buildings																					
2b.1.3.1	Reactor	1,009	2,385	127	871	187	10,692	-	3,945	19,217	19,217	-	-	2,230	57,418	-	-	-	3,559,977	50,853	-
2b.1.3.2	Auxiliary	1,070	358	11	82	89	561	-	791	2,962	2,962	-	-	1,060	3,355	-	-	-	332,498	23,808	-
2b.1.3.3	Backwash Waste Receiving Tank	-	25	1	12	-	84	-	29	151	151	-	-	-	507	-	-	-	43,896	299	-
2b.1.3.4	Drum Transfer & Truck Loading Enclosure	15	7	0	2	2	12	-	13	51	51	-	-	19	74	-	-	-	7,118	368	-
2b.1.3.5	LLRW Storage Enclosure	102	46	1	12	3	84	-	86	334	334	-	-	38	502	-	-	-	44,971	2,424	-
2b.1.3.6	Radwaste	46	20	1	5	3	38	-	39	152	152	-	-	42	225	-	-	-	21,136	1,082	-
2b.1.3.7	Resin Disposal	13	10	0	2	7	12	-	14	58	58	-	-	83	69	-	-	-	9,271	383	-
2b.1.3	Totals	2,255	2,852	141	985	290	11,483	-	4,917	22,924	22,924	-	-	3,471	62,151	-	-	-	4,018,868	79,216	-
2b.1	Subtotal Period 2b Activity Costs	5,191	19,327	698	1,799	8,017	15,739	-	12,663	63,435	60,657	-	2,777	95,700	77,691	-	-	-	8,795,250	382,443	-
Period 2b Additional Costs																					
2b.2.1	Remedial Action Surveys	-	-	-	-	-	-	1,538	461	2,000	2,000	-	-	-	-	-	-	-	-	31,493	-
2b.2.2	Operational Equipment	-	-	9	31	302	-	-	51	391	391	-	-	5,855	-	-	-	-	146,375	16	-
2b.2	Subtotal Period 2b Additional Costs	-	-	9	31	302	-	1,538	512	2,391	2,391	-	-	5,855	-	-	-	-	146,375	31,509	-
Period 2b Collateral Costs																					
2b.3.1	Process decommissioning water waste	157	-	104	267	-	454	-	242	1,225	1,225	-	-	-	1,021	-	-	-	61,281	199	-
2b.3.2	Process decommissioning chemical flush waste	3	-	113	416	-	911	-	303	1,745	1,745	-	-	-	1,154	-	-	-	122,948	216	-
2b.3.3	Small tool allowance	-	351	-	-	-	-	-	53	404	404	-	-	-	-	-	-	-	-	-	-
2b.3.4	Spent Fuel Capital and Transfer	-	-	-	-	-	-	5,547	832	6,379	-	6,379	-	-	-	-	-	-	-	-	-
2b.3.5	On-site survey and release of 0.437 tons clean metallic waste	-	-	-	-	-	-	1	0	1	1	-	-	-	-	-	-	-	-	-	-
2b.3	Subtotal Period 2b Collateral Costs	160	351	217	683	-	1,365	5,548	1,430	9,754	3,374	6,379	-	-	2,175	-	-	-	184,229	415	-
Period 2b Period-Dependent Costs																					
2b.4.1	Decon supplies	894	-	-	-	-	-	-	224	1,118	1,118	-	-	-	-	-	-	-	-	-	-
2b.4.2	Insurance	-	-	-	-	-	-	758	76	833	833	-	-	-	-	-	-	-	-	-	-
2b.4.3	Property taxes	-	-	-	-	-	-	2,157	216	2,373	2,373	-	-	-	-	-	-	-	-	-	-
2b.4.4	Health physics supplies	-	2,630	-	-	-	-	-	658	3,288	3,288	-	-	-	-	-	-	-	-	-	-
2b.4.5	Heavy equipment rental	-	3,046	-	-	-	-	-	457	3,503	3,503	-	-	-	-	-	-	-	-	-	-
2b.4.6	Disposal of DAW generated	-	-	114	37	-	430	-	125	706	706	-	-	-	5,477	-	-	-	109,540	179	-
2b.4.7	Plant energy budget	-	-	-	-	-	-	3,512	527	4,039	4,039	-	-	-	-	-	-	-	-	-	-
2b.4.8	NRC Fees	-	-	-	-	-	-	660	66	726	726	-	-	-	-	-	-	-	-	-	-
2b.4.9	Emergency Planning Fees	-	-	-	-	-	-	1,799	180	1,979	-	1,979	-	-	-	-	-	-	-	-	-
2b.4.10	Fixed Overhead	-	-	-	-	-	-	1,857	279	2,136	2,136	-	-	-	-	-	-	-	-	-	-
2b.4.11	Spent Fuel Pool O&M	-	-	-	-	-	-	599	90	689	-	689	-	-	-	-	-	-	-	-	-
2b.4.12	Liquid Radwaste Processing Equipment/Services	-	-	-	-	-	-	304	46	349	349	-	-	-	-	-	-	-	-	-	-

Table E-2
Prairie Island DECON Unit 2
100 Years of Spent Fuel Storage Decommissioning Cost Estimate
(Thousands of 2014 Dollars)

Activity Index	Activity Description	Decon Cost	Removal Cost	Packaging Costs	Transport Costs	Off-Site Processing Costs	LLRW Disposal Costs	Other Costs	Total Contingency	Total Costs	NRC Lic. Term. Costs	Spent Fuel Management Costs	Site Restoration Costs	Processed Volume Cu. Feet	Burial Volumes				Burial / Processed Wt., Lbs.	Craft Manhours	Utility and Contractor Manhours
															Class A Cu. Feet	Class B Cu. Feet	Class C Cu. Feet	GTCC Cu. Feet			
Period 2b Period-Dependent Costs (continued)																					
2b.4.13	ISFSI Operating Costs	-	-	-	-	-	-	72	11	83	-	83	-	-	-	-	-	-	-	-	-
2b.4.14	Railroad Track Maintenance	-	-	-	-	-	-	81	12	93	-	-	93	-	-	-	-	-	-	-	-
2b.4.15	Security Staff Cost	-	-	-	-	-	-	6,910	1,037	7,947	7,947	-	-	-	-	-	-	-	-	-	199,870
2b.4.16	DOC Staff Cost	-	-	-	-	-	-	16,857	2,529	19,386	19,386	-	-	-	-	-	-	-	-	-	230,680
2b.4.17	Utility Staff Cost	-	-	-	-	-	-	22,809	3,421	26,230	26,230	-	-	-	-	-	-	-	-	-	428,180
2b.4	Subtotal Period 2b Period-Dependent Costs	894	5,676	114	37	-	430	58,375	9,950	75,477	72,632	2,751	93	-	5,477	-	-	-	109,540	179	858,730
2b.0	TOTAL PERIOD 2b COST	6,245	25,354	1,038	2,550	8,319	17,534	65,461	24,555	151,056	139,055	9,131	2,870	101,555	85,343	-	-	-	9,235,394	414,545	858,730
PERIOD 2c - Spent fuel delay prior to SFP decon																					
Period 2c Direct Decommissioning Activities																					
Period 2c Collateral Costs																					
2c.3.1	Spent Fuel Capital and Transfer	-	-	-	-	-	-	69,007	10,351	79,358	-	79,358	-	-	-	-	-	-	-	-	-
2c.3	Subtotal Period 2c Collateral Costs	-	-	-	-	-	-	69,007	10,351	79,358	-	79,358	-	-	-	-	-	-	-	-	-
Period 2c Period-Dependent Costs																					
2c.4.1	Insurance	-	-	-	-	-	-	5,381	538	5,919	5,919	-	-	-	-	-	-	-	-	-	-
2c.4.2	Property taxes	-	-	-	-	-	-	11,530	1,153	12,684	12,684	-	-	-	-	-	-	-	-	-	-
2c.4.3	Health physics supplies	-	2,115	-	-	-	-	-	529	2,644	2,644	-	-	-	-	-	-	-	-	-	-
2c.4.4	Disposal of DAW generated	-	-	92	30	-	349	-	101	572	572	-	-	-	4,440	-	-	-	88,800	145	-
2c.4.5	Plant energy budget	-	-	-	-	-	-	6,652	998	7,650	7,650	-	-	-	-	-	-	-	-	-	-
2c.4.6	NRC Fees	-	-	-	-	-	-	2,860	286	3,146	3,146	-	-	-	-	-	-	-	-	-	-
2c.4.7	Emergency Planning Fees	-	-	-	-	-	-	12,779	1,278	14,057	-	14,057	-	-	-	-	-	-	-	-	-
2c.4.8	Fixed Overhead	-	-	-	-	-	-	13,191	1,979	15,169	15,169	-	-	-	-	-	-	-	-	-	-
2c.4.9	Spent Fuel Pool O&M	-	-	-	-	-	-	4,257	638	4,895	-	4,895	-	-	-	-	-	-	-	-	-
2c.4.10	Liquid Radwaste Processing Equipment/Services	-	-	-	-	-	-	216	32	248	248	-	-	-	-	-	-	-	-	-	-
2c.4.11	ISFSI Operating Costs	-	-	-	-	-	-	514	77	591	-	591	-	-	-	-	-	-	-	-	-
2c.4.12	Railroad Track Maintenance	-	-	-	-	-	-	574	86	660	-	-	660	-	-	-	-	-	-	-	-
2c.4.13	Security Staff Cost	-	-	-	-	-	-	41,864	6,280	48,144	24,072	24,072	-	-	-	-	-	-	-	-	1,195,234
2c.4.14	Utility Staff Cost	-	-	-	-	-	-	46,311	6,947	53,258	26,629	26,629	-	-	-	-	-	-	-	-	886,606
2c.4	Subtotal Period 2c Period-Dependent Costs	-	2,115	92	30	-	349	146,129	20,922	169,638	98,734	70,244	660	-	4,440	-	-	-	88,800	145	2,081,840
2c.0	TOTAL PERIOD 2c COST	-	2,115	92	30	-	349	215,136	31,273	248,995	98,734	149,602	660	-	4,440	-	-	-	88,800	145	2,081,840
PERIOD 2d - Decontamination Following Wet Fuel Storage																					
Period 2d Direct Decommissioning Activities																					
2d.1.1	Remove spent fuel racks	287	29	90	32	-	574	-	308	1,320	1,320	-	-	-	2,092	-	-	-	138,298	576	-
Disposal of Plant Systems																					
2d.1.2.1	Electrical - Contaminated - Fuel Pool	-	163	2	6	72	9	-	55	307	307	-	-	864	33	-	-	-	37,250	2,783	-
2d.1.2.2	Electrical - Decontaminated - Fuel Pool	-	1,001	13	50	675	-	-	360	2,099	2,099	-	-	8,069	-	-	-	-	327,668	16,495	-
2d.1.2.3	Fire Protection & Detection - RCA Fuel P	-	30	0	2	24	-	-	11	67	67	-	-	286	-	-	-	-	11,622	476	-
2d.1.2.4	HVAC - Contaminated - Fuel Pool	-	466	11	33	404	50	-	196	1,159	1,159	-	-	4,828	182	-	-	-	208,080	7,448	-
2d.1.2.5	Safeguards Chilled Water - RCA	-	4	0	0	2	-	-	1	7	7	-	-	26	-	-	-	-	1,045	51	-
2d.1.2.6	Spent Fuel Pool Cooling	27	29	3	2	3	29	-	29	122	122	-	-	39	107	-	-	-	8,635	882	-
2d.1.2.7	Spent Fuel Pool Normal Ventilation	-	22	1	2	22	3	-	10	60	60	-	-	265	12	-	-	-	11,532	394	-
2d.1.2	Totals	27	1,715	29	94	1,203	91	-	662	3,822	3,822	-	-	14,376	333	-	-	-	605,832	28,530	-
Decontamination of Site Buildings																					
2d.1.3.1	Fuel Handling of Aux Building	860	941	9	34	202	167	-	743	2,956	2,956	-	-	2,417	944	-	-	-	177,818	30,401	-
2d.1.3	Totals	860	941	9	34	202	167	-	743	2,956	2,956	-	-	2,417	944	-	-	-	177,818	30,401	-
2d.1.4	Scaffolding in support of decommissioning	-	626	6	2	23	6	-	162	826	826	-	-	253	22	-	-	-	12,861	6,567	-
2d.1	Subtotal Period 2d Activity Costs	1,174	3,311	134	163	1,428	838	-	1,876	8,923	8,923	-	-	17,046	3,391	-	-	-	934,809	66,074	-
Period 2d Additional Costs																					
2d.2.1	License Termination Survey Planning	-	-	-	-	-	-	547	164	711	711	-	-	-	-	-	-	-	-	-	6,240
2d.2.2	Remedial Action Surveys	-	-	-	-	-	-	793	238	1,031	1,031	-	-	-	-	-	-	-	-	16,230	-
2d.2	Subtotal Period 2d Additional Costs	-	-	-	-	-	-	1,339	402	1,741	1,741	-	-	-	-	-	-	-	-	16,230	6,240

Table E-2
Prairie Island DECON Unit 2
100 Years of Spent Fuel Storage Decommissioning Cost Estimate
(Thousands of 2014 Dollars)

Activity Index	Activity Description	Decon Cost	Removal Cost	Packaging Costs	Transport Costs	Off-Site Processing Costs	LLRW Disposal Costs	Other Costs	Total Contingency	Total Costs	NRC Lic. Term. Costs	Spent Fuel Management Costs	Site Restoration Costs	Processed Volume Cu. Feet	Burial Volumes				Burial / Processed Wt., Lbs.	Craft Manhours	Utility and Contractor Manhours
															Class A Cu. Feet	Class B Cu. Feet	Class C Cu. Feet	GTCC Cu. Feet			
Period 2d Collateral Costs																					
2d.3.1	Process decommissioning water waste	15	-	12	30	-	52	-	26	135	135	-	-	-	117	-	-	-	6,990	23	-
2d.3.2	Process decommissioning chemical flush waste	0	-	1	5	-	11	-	4	20	20	-	-	-	13	-	-	-	1,422	2	-
2d.3.3	Small tool allowance	-	67	-	-	-	-	-	10	77	77	-	-	-	-	-	-	-	-	-	-
2d.3.4	Decommissioning Equipment Disposition	-	-	137	59	556	145	-	142	1,039	1,039	-	-	6,000	529	-	-	-	304,968	88	-
2d.3.5	Spent Fuel Capital and Transfer	-	-	-	-	-	-	3,528	529	4,057	-	4,057	-	-	-	-	-	-	-	-	-
2d.3	Subtotal Period 2d Collateral Costs	15	67	150	94	556	207	3,528	711	5,328	1,271	4,057	-	6,000	659	-	-	-	313,381	113	-
Period 2d Period-Dependent Costs																					
2d.4.1	Decon supplies	168	-	-	-	-	-	-	42	211	211	-	-	-	-	-	-	-	-	-	-
2d.4.2	Insurance	-	-	-	-	-	-	390	39	429	429	-	-	-	-	-	-	-	-	-	-
2d.4.3	Property taxes	-	-	-	-	-	-	579	58	637	637	-	-	-	-	-	-	-	-	-	-
2d.4.4	Health physics supplies	-	707	-	-	-	-	-	177	884	884	-	-	-	-	-	-	-	-	-	-
2d.4.5	Heavy equipment rental	-	1,570	-	-	-	-	-	235	1,805	1,805	-	-	-	-	-	-	-	-	-	-
2d.4.6	Disposal of DAW generated	-	-	42	14	-	157	-	46	258	258	-	-	-	2,002	-	-	-	40,031	65	-
2d.4.7	Plant energy budget	-	-	-	-	-	-	965	145	1,110	1,110	-	-	-	-	-	-	-	-	-	-
2d.4.8	NRC Fees	-	-	-	-	-	-	285	29	314	314	-	-	-	-	-	-	-	-	-	-
2d.4.9	Emergency Planning Fees	-	-	-	-	-	-	927	93	1,020	-	1,020	-	-	-	-	-	-	-	-	-
2d.4.10	Fixed Overhead	-	-	-	-	-	-	957	144	1,101	1,101	-	-	-	-	-	-	-	-	-	-
2d.4.11	Liquid Radwaste Processing Equipment/Services	-	-	-	-	-	-	313	47	360	360	-	-	-	-	-	-	-	-	-	-
2d.4.12	ISFSI Operating Costs	-	-	-	-	-	-	37	6	43	-	43	-	-	-	-	-	-	-	-	-
2d.4.13	Railroad Track Maintenance	-	-	-	-	-	-	42	6	48	-	-	48	-	-	-	-	-	-	-	-
2d.4.14	Security Staff Cost	-	-	-	-	-	-	1,074	161	1,235	1,235	-	-	-	-	-	-	-	-	-	29,526
2d.4.15	DOC Staff Cost	-	-	-	-	-	-	5,091	764	5,855	5,855	-	-	-	-	-	-	-	-	-	70,436
2d.4.16	Utility Staff Cost	-	-	-	-	-	-	6,818	1,023	7,841	7,841	-	-	-	-	-	-	-	-	-	127,029
2d.4	Subtotal Period 2d Period-Dependent Costs	168	2,277	42	14	-	157	17,480	3,013	23,150	22,039	1,063	48	-	2,002	-	-	-	40,031	65	226,990
2d.0	TOTAL PERIOD 2d COST	1,357	5,654	325	270	1,985	1,203	22,347	6,001	39,142	33,974	5,120	48	23,046	6,052	-	-	-	1,288,221	82,483	233,230
PERIOD 2f - License Termination																					
Period 2f Direct Decommissioning Activities																					
2f.1.1	ORISE confirmatory survey	-	-	-	-	-	-	163	49	212	212	-	-	-	-	-	-	-	-	-	-
2f.1.2	Terminate license	-	-	-	-	-	-	-	-	a	-	-	-	-	-	-	-	-	-	-	-
2f.1	Subtotal Period 2f Activity Costs	-	-	-	-	-	-	163	49	212	212	-	-	-	-	-	-	-	-	-	-
Period 2f Additional Costs																					
2f.2.1	License Termination Survey	-	-	-	-	-	-	5,826	1,748	7,573	7,573	-	-	-	-	-	-	-	-	102,642	3,120
2f.2	Subtotal Period 2f Additional Costs	-	-	-	-	-	-	5,826	1,748	7,573	7,573	-	-	-	-	-	-	-	-	102,642	3,120
Period 2f Collateral Costs																					
2f.3.1	DOC staff relocation expenses	-	-	-	-	-	-	1,708	256	1,964	1,964	-	-	-	-	-	-	-	-	-	-
2f.3.2	Spent Fuel Capital and Transfer	-	-	-	-	-	-	2,299	345	2,643	-	2,643	-	-	-	-	-	-	-	-	-
2f.3	Subtotal Period 2f Collateral Costs	-	-	-	-	-	-	4,006	601	4,607	1,964	2,643	-	-	-	-	-	-	-	-	-
Period 2f Period-Dependent Costs																					
2f.4.1	Insurance	-	-	-	-	-	-	344	34	379	379	-	-	-	-	-	-	-	-	-	-
2f.4.2	Property taxes	-	-	-	-	-	-	526	53	578	578	-	-	-	-	-	-	-	-	-	-
2f.4.3	Health physics supplies	-	572	-	-	-	-	-	143	715	715	-	-	-	-	-	-	-	-	-	-
2f.4.4	Disposal of DAW generated	-	-	7	2	-	26	-	8	43	43	-	-	-	334	-	-	-	6,685	11	-
2f.4.5	Plant energy budget	-	-	-	-	-	-	462	69	532	532	-	-	-	-	-	-	-	-	-	-
2f.4.6	NRC Fees	-	-	-	-	-	-	300	30	330	330	-	-	-	-	-	-	-	-	-	-
2f.4.7	Emergency Planning Fees	-	-	-	-	-	-	47	5	52	-	52	-	-	-	-	-	-	-	-	-
2f.4.8	Fixed Overhead	-	-	-	-	-	-	917	138	1,054	1,054	-	-	-	-	-	-	-	-	-	-
2f.4.9	ISFSI Operating Costs	-	-	-	-	-	-	36	5	41	-	41	-	-	-	-	-	-	-	-	-
2f.4.10	Railroad Track Maintenance	-	-	-	-	-	-	40	6	46	-	-	46	-	-	-	-	-	-	-	-
2f.4.11	Security Staff Cost	-	-	-	-	-	-	1,010	151	1,161	1,161	-	-	-	-	-	-	-	-	-	27,690
2f.4.12	DOC Staff Cost	-	-	-	-	-	-	3,451	518	3,969	3,969	-	-	-	-	-	-	-	-	-	46,410
2f.4.13	Utility Staff Cost	-	-	-	-	-	-	3,345	502	3,847	3,847	-	-	-	-	-	-	-	-	-	59,670
2f.4	Subtotal Period 2f Period-Dependent Costs	-	572	7	2	-	26	10,478	1,661	12,747	12,608	93	46	-	334	-	-	-	6,685	11	133,770
2f.0	TOTAL PERIOD 2f COST	-	572	7	2	-	26	20,473	4,059	25,139	22,357	2,737	46	-	334	-	-	-	6,685	102,653	136,890
PERIOD 2 TOTALS		8,469	57,971	25,318	6,802	13,306	35,308	383,275	97,170	627,619	442,158	178,945	6,517	163,227	131,421	125	617	-	14,923,200	834,160	4,036,861

Prairie Island Nuclear Nuclear Generating Plant
Decommissioning Cost Analysis

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Table E-2
Prairie Island DECON Unit 2
100 Years of Spent Fuel Storage Decommissioning Cost Estimate
(Thousands of 2014 Dollars)

Activity Index	Activity Description	Decon Cost	Removal Cost	Packaging Costs	Transport Costs	Off-Site Processing Costs	LLRW Disposal Costs	Other Costs	Total Contingency	Total Costs	NRC Lic. Term. Costs	Spent Fuel Management Costs	Site Restoration Costs	Processed Volume Cu. Feet	Burial Volumes				Burial / Processed Wt., Lbs.	Craft Manhours	Utility and Contractor Manhours
															Class A Cu. Feet	Class B Cu. Feet	Class C Cu. Feet	GTCC Cu. Feet			
Period 3c Collateral Costs																					
3c.3.1	Spent Fuel Capital and Transfer	-	-	-	-	-	-	213,007	31,951	244,959	-	244,959	-	-	-	-	-	-	-	-	-
3c.3	Subtotal Period 3c Collateral Costs	-	-	-	-	-	-	213,007	31,951	244,959	-	244,959	-	-	-	-	-	-	-	-	-
Period 3c Period-Dependent Costs																					
3c.4.1	Insurance	-	-	-	-	-	-	8,645	865	9,510	-	9,510	-	-	-	-	-	-	-	-	-
3c.4.2	Property taxes	-	-	-	-	-	-	20,991	2,099	23,090	-	23,090	-	-	-	-	-	-	-	-	-
3c.4.3	Plant energy budget	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
3c.4.4	NRC ISFSI Fees	-	-	-	-	-	-	6,821	682	7,503	-	7,503	-	-	-	-	-	-	-	-	-
3c.4.5	Emergency Planning Fees	-	-	-	-	-	-	2,375	237	2,612	-	2,612	-	-	-	-	-	-	-	-	-
3c.4.6	Fixed Overhead	-	-	-	-	-	-	20,212	3,032	23,243	-	23,243	-	-	-	-	-	-	-	-	-
3c.4.7	ISFSI Operating Costs	-	-	-	-	-	-	1,793	269	2,062	-	2,062	-	-	-	-	-	-	-	-	-
3c.4.8	Railroad Track Maintenance	-	-	-	-	-	-	2,003	300	2,303	-	2,303	-	-	-	-	-	-	-	-	-
3c.4.9	Security Staff Cost	-	-	-	-	-	-	39,979	5,997	45,976	-	45,976	-	-	-	-	-	-	-	-	1,057,397
3c.4.10	DOC Staff Cost	-	-	-	-	-	-	3,742	561	4,303	-	4,303	-	-	-	-	-	-	-	-	39,163
3c.4.11	Utility Staff Cost	-	-	-	-	-	-	26,359	3,954	30,312	-	30,312	-	-	-	-	-	-	-	-	519,300
3c.4	Subtotal Period 3c Period-Dependent Costs	-	-	-	-	-	-	132,919	17,996	150,915	-	150,915	-	-	-	-	-	-	-	-	1,615,860
3c.0	TOTAL PERIOD 3c COST	-	-	-	2,136	-	17,808	345,926	54,720	420,589	-	420,589	-	-	58,431	-	-	-	9,261,000	-	1,615,860
PERIOD 3d - GTCC shipping																					
Period 3d Direct Decommissioning Activities																					
Nuclear Steam Supply System Removal																					
3d.1.1.1	Vessel & Internals GTCC Disposal	-	-	877	-	-	7,480	-	1,341	9,698	9,698	-	-	-	-	-	-	2,810	641,697	-	-
3d.1.1	Totals	-	-	877	-	-	7,480	-	1,341	9,698	9,698	-	-	-	-	-	-	2,810	641,697	-	-
3d.1	Subtotal Period 3d Activity Costs	-	-	877	-	-	7,480	-	1,341	9,698	9,698	-	-	-	-	-	-	2,810	641,697	-	-
Period 3d Collateral Costs																					
3d.3.1	Spent Fuel Capital and Transfer	-	-	-	-	-	-	82,249	12,337	94,587	-	94,587	-	-	-	-	-	-	-	-	-
3d.3	Subtotal Period 3d Collateral Costs	-	-	-	-	-	-	82,249	12,337	94,587	-	94,587	-	-	-	-	-	-	-	-	-
Period 3d Period-Dependent Costs																					
3d.4.1	Insurance	-	-	-	-	-	-	6,219	622	6,841	-	6,841	-	-	-	-	-	-	-	-	-
3d.4.2	Property taxes	-	-	-	-	-	-	15,102	1,510	16,612	-	16,612	-	-	-	-	-	-	-	-	-
3d.4.3	Plant energy budget	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
3d.4.4	NRC ISFSI Fees	-	-	-	-	-	-	4,907	491	5,398	-	5,398	-	-	-	-	-	-	-	-	-
3d.4.5	Emergency Planning Fees	-	-	-	-	-	-	1,709	171	1,879	-	1,879	-	-	-	-	-	-	-	-	-
3d.4.6	Fixed Overhead	-	-	-	-	-	-	14,541	2,181	16,722	-	16,722	-	-	-	-	-	-	-	-	-
3d.4.7	ISFSI Operating Costs	-	-	-	-	-	-	1,290	193	1,483	-	1,483	-	-	-	-	-	-	-	-	-
3d.4.8	Railroad Track Maintenance	-	-	-	-	-	-	1,639	246	1,885	-	1,885	-	-	-	-	-	-	-	-	-
3d.4.9	Security Staff Cost	-	-	-	-	-	-	28,762	4,314	33,076	-	33,076	-	-	-	-	-	-	-	-	760,706
3d.4.10	Utility Staff Cost	-	-	-	-	-	-	10,039	1,506	11,544	-	11,544	-	-	-	-	-	-	-	-	190,458
3d.4	Subtotal Period 3d Period-Dependent Costs	-	-	-	-	-	-	84,206	11,234	95,441	-	95,441	-	-	-	-	-	-	-	-	951,164
3d.0	TOTAL PERIOD 3d COST	-	-	877	-	-	7,480	166,456	24,913	199,726	9,698	190,027	-	-	-	-	-	2,810	641,697	-	951,164
PERIOD 3e - ISFSI Decontamination																					
Period 3e Direct Decommissioning Activities																					
Period 3e Additional Costs																					
3e.2.1	Decommissioning of ISFSI	-	-	1	0	-	2	559	140	702	702	-	-	-	30	-	-	-	600	2,550	828
3e.2	Subtotal Period 3e Additional Costs	-	-	1	0	-	2	559	140	702	702	-	-	-	30	-	-	-	600	2,550	828
Period 3e Collateral Costs																					
3e.3	Subtotal Period 3e Collateral Costs	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-

Prairie Island Nuclear Nuclear Generating Plant
Decommissioning Cost Analysis

Table E-2
Prairie Island DECON Unit 2
100 Years of Spent Fuel Storage Decommissioning Cost Estimate
(Thousands of 2014 Dollars)

Activity Index	Activity Description	Decon Cost	Removal Cost	Packaging Costs	Transport Costs	Off-Site Processing Costs	LLRW Disposal Costs	Other Costs	Total Contingency	Total Costs	NRC Lic. Term. Costs	Spent Fuel Management Costs	Site Restoration Costs	Processed Volume Cu. Feet	Burial Volumes				Burial / Processed Wt., Lbs.	Craft Manhours	Utility and Contractor Manhours
															Class A Cu. Feet	Class B Cu. Feet	Class C Cu. Feet	GTCC Cu. Feet			
Period 3e Period-Dependent Costs																					
3e.4.1	Insurance	-	-	-	-	-	-	84	21	104	104	-	-	-	-	-	-	-	-	-	-
3e.4.2	Property taxes	-	-	-	-	-	-	185	46	232	232	-	-	-	-	-	-	-	-	-	-
3e.4.3	Plant energy budget	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
3e.4.4	Fixed Overhead	-	-	-	-	-	-	178	45	223	223	-	-	-	-	-	-	-	-	-	-
3e.4.5	Railroad Track Maintenance	-	-	-	-	-	-	18	4	22	-	-	22	-	-	-	-	-	-	-	-
3e.4.6	Security Staff Cost	-	-	-	-	-	-	65	16	81	81	-	-	-	-	-	-	-	-	-	2,510
3e.4.7	Utility Staff Cost	-	-	-	-	-	-	103	26	129	129	-	-	-	-	-	-	-	-	-	1,901
3e.4	Subtotal Period 3e Period-Dependent Costs	-	-	-	-	-	-	633	158	791	769	-	22	-	-	-	-	-	-	-	4,411
3e.0	TOTAL PERIOD 3e COST	-	-	1	0	-	2	1,192	299	1,494	1,471	-	22	-	30	-	-	-	600	2,550	5,239
PERIOD 3f - ISFSI Site Restoration																					
Period 3f Direct Decommissioning Activities																					
Period 3f Additional Costs																					
3f.2.1	Demolition and Site Restoration of ISFSI	-	248	-	-	-	-	28	41	317	-	-	317	-	-	-	-	-	-	1,327	80
3f.2	Subtotal Period 3f Additional Costs	-	248	-	-	-	-	28	41	317	-	-	317	-	-	-	-	-	-	1,327	80
Period 3f Collateral Costs																					
3f.3.1	Small tool allowance	-	2	-	-	-	-	-	0	2	-	-	2	-	-	-	-	-	-	-	-
3f.3	Subtotal Period 3f Collateral Costs	-	2	-	-	-	-	-	0	2	-	-	2	-	-	-	-	-	-	-	-
Period 3f Period-Dependent Costs																					
3f.4.1	Insurance	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
3f.4.2	Property taxes	-	-	-	-	-	-	93	9	103	-	-	103	-	-	-	-	-	-	-	-
3f.4.3	Plant energy budget	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
3f.4.4	Fixed Overhead	-	-	-	-	-	-	90	13	103	-	-	103	-	-	-	-	-	-	-	-
3f.4.5	Railroad Track Maintenance	-	-	-	-	-	-	9	1	10	-	-	10	-	-	-	-	-	-	-	-
3f.4.6	Security Staff Cost	-	-	-	-	-	-	33	5	38	-	-	38	-	-	-	-	-	-	-	1,265
3f.4.7	Utility Staff Cost	-	-	-	-	-	-	41	6	47	-	-	47	-	-	-	-	-	-	-	784
3f.4	Subtotal Period 3f Period-Dependent Costs	-	-	-	-	-	-	266	35	301	-	-	301	-	-	-	-	-	-	-	2,050
3f.0	TOTAL PERIOD 3f COST	-	250	-	-	-	-	293	77	620	-	-	620	-	-	-	-	-	-	1,327	2,130
PERIOD 3 TOTALS		-	26,998	878	2,136	-	25,290	553,812	89,896	699,011	11,257	638,517	49,237	-	58,461	-	-	2,810	9,903,297	219,008	2,843,792
TOTAL COST TO DECOMMISSION		11,409	90,042	26,578	9,349	13,462	65,578	1,031,178	204,088	1,451,685	552,040	843,197	56,447	169,551	203,769	713	617	2,810	25,446,020	1,086,709	7,734,902

TOTAL COST TO DECOMMISSION WITH 16.36% CONTINGENCY:	\$1,451,685	thousands of 2014	dollars
TOTAL NRC LICENSE TERMINATION COST IS 38.03% OR:	\$552,040	thousands of 2014	dollars
SPENT FUEL MANAGEMENT COST IS 58.08% OR:	\$843,197	thousands of 2014	dollars
NON-NUCLEAR DEMOLITION COST IS 3.89% OR:	\$56,447	thousands of 2014	dollars
TOTAL RADWASTE VOLUME BURIED (EXCLUDING GTCC):	205,099	Cubic Feet	
TOTAL GREATER THAN CLASS C RADWASTE VOLUME GENERATED:	2,810	Cubic Feet	
TOTAL SCRAP METAL REMOVED:	34,906	Tons	
TOTAL CRAFT LABOR REQUIREMENTS:	1,086,709	Man-hours	

End Notes:
n/a - indicates that this activity not charged as decommissioning expense.
a - indicates that this activity performed by decommissioning staff.
0 - indicates that this value is less than 0.5 but is non-zero.
a cell containing " - " indicates a zero value

**APPENDIX F
DETAILED COST ANALYSIS
SCENARIO 4
DECON DECOMMISSIONING COST ESTIMATE
WITH 200 YEARS OF SPENT FUEL STORAGE
AND PERIODIC TN-40 REPLACEMENT**

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Prairie Island Nuclear Nuclear Generating Plant
Decommissioning Cost Analysis

Table F-1
Prairie Island DECON Unit 1
200 Years of Spent Fuel Storage and Periodic TN-40 Replacement Decommissioning Cost Estimate
(Thousands of 2014 Dollars)

Activity Index	Activity Description	Decon Cost	Removal Cost	Packaging Costs	Transport Costs	Off-Site Processing Costs	LLRW Disposal Costs	Other Costs	Total Contingency	Total Costs	NRC Lic. Term. Costs	Spent Fuel Management Costs	Site Restoration Costs	Processed Volume Cu. Feet	Burial Volumes				Burial / Processed Wt., Lbs.	Craft Manhours	Utility and Contractor Manhours
															Class A Cu. Feet	Class B Cu. Feet	Class C Cu. Feet	GTCC Cu. Feet			
PERIOD 1a - Shutdown through Transition																					
Period 1a Direct Decommissioning Activities																					
1a.1.1	Prepare preliminary decommissioning cost	-	-	-	-	-	-	148	22	170	170	-	-	-	-	-	-	-	-	-	1,300
1a.1.2	Notification of Cessation of Operations									a											
1a.1.3	Remove fuel & source material									n/a											
1a.1.4	Notification of Permanent Defueling									a											
1a.1.5	Deactivate plant systems & process waste									a											
1a.1.6	Prepare and submit PSDAR	-	-	-	-	-	-	227	34	261	261	-	-	-	-	-	-	-	-	-	2,000
1a.1.7	Review plant dwgs & specs.	-	-	-	-	-	-	522	78	601	601	-	-	-	-	-	-	-	-	-	4,600
1a.1.8	Perform detailed rad survey									a											
1a.1.9	Estimate by-product inventory	-	-	-	-	-	-	114	17	131	131	-	-	-	-	-	-	-	-	-	1,000
1a.1.10	End product description	-	-	-	-	-	-	114	17	131	131	-	-	-	-	-	-	-	-	-	1,000
1a.1.11	Detailed by-product inventory	-	-	-	-	-	-	148	22	170	170	-	-	-	-	-	-	-	-	-	1,300
1a.1.12	Define major work sequence	-	-	-	-	-	-	851	128	979	979	-	-	-	-	-	-	-	-	-	7,500
1a.1.13	Perform SER and EA	-	-	-	-	-	-	352	53	405	405	-	-	-	-	-	-	-	-	-	3,100
1a.1.14	Perform Site-Specific Cost Study	-	-	-	-	-	-	568	85	653	653	-	-	-	-	-	-	-	-	-	5,000
1a.1.15	Prepare/submit License Termination Plan	-	-	-	-	-	-	465	70	535	535	-	-	-	-	-	-	-	-	-	4,096
1a.1.16	Receive NRC approval of termination plan									a											
Activity Specifications																					
1a.1.17.1	Plant & temporary facilities	-	-	-	-	-	-	559	84	642	578	-	64	-	-	-	-	-	-	-	4,920
1a.1.17.2	Plant systems	-	-	-	-	-	-	473	71	544	490	-	54	-	-	-	-	-	-	-	4,167
1a.1.17.3	NSSS Decontamination Flush	-	-	-	-	-	-	57	9	65	65	-	-	-	-	-	-	-	-	-	500
1a.1.17.4	Reactor internals	-	-	-	-	-	-	806	121	927	927	-	-	-	-	-	-	-	-	-	7,100
1a.1.17.5	Reactor vessel	-	-	-	-	-	-	738	111	849	849	-	-	-	-	-	-	-	-	-	6,500
1a.1.17.6	Biological shield	-	-	-	-	-	-	57	9	65	65	-	-	-	-	-	-	-	-	-	500
1a.1.17.7	Steam generators	-	-	-	-	-	-	354	53	407	407	-	-	-	-	-	-	-	-	-	3,120
1a.1.17.8	Reinforced concrete	-	-	-	-	-	-	182	27	209	104	-	104	-	-	-	-	-	-	-	1,600
1a.1.17.9	Main Turbine	-	-	-	-	-	-	45	7	52	-	-	52	-	-	-	-	-	-	-	400
1a.1.17.10	Main Condensers	-	-	-	-	-	-	45	7	52	-	-	52	-	-	-	-	-	-	-	400
1a.1.17.11	Plant structures & buildings	-	-	-	-	-	-	354	53	407	204	-	204	-	-	-	-	-	-	-	3,120
1a.1.17.12	Waste management	-	-	-	-	-	-	522	78	601	601	-	-	-	-	-	-	-	-	-	4,600
1a.1.17.13	Facility & site closeout	-	-	-	-	-	-	102	15	118	59	-	59	-	-	-	-	-	-	-	900
1a.1.17	Total	-	-	-	-	-	-	4,294	644	4,939	4,349	-	590	-	-	-	-	-	-	-	37,827
Planning & Site Preparations																					
1a.1.18	Prepare dismantling sequence	-	-	-	-	-	-	272	41	313	313	-	-	-	-	-	-	-	-	-	2,400
1a.1.19	Plant prep. & temp. svces	-	-	-	-	-	-	3,000	450	3,450	3,450	-	-	-	-	-	-	-	-	-	-
1a.1.20	Design water clean-up system	-	-	-	-	-	-	159	24	183	183	-	-	-	-	-	-	-	-	-	1,400
1a.1.21	Rigging/Cont. Cntrl Envlp/s/tooling/etc.	-	-	-	-	-	-	2,300	345	2,645	2,645	-	-	-	-	-	-	-	-	-	-
1a.1.22	Procure casks/liners & containers	-	-	-	-	-	-	140	21	161	161	-	-	-	-	-	-	-	-	-	1,230
1a.1	Subtotal Period 1a Activity Costs	-	-	-	-	-	-	13,673	2,051	15,724	15,134	-	590	-	-	-	-	-	-	-	73,753
Period 1a Additional Costs																					
1a.2.1	Spent Fuel Pool Isolation	-	-	-	-	-	-	10,813	1,622	12,434	12,434	-	-	-	-	-	-	-	-	-	-
1a.2	Subtotal Period 1a Additional Costs	-	-	-	-	-	-	10,813	1,622	12,434	12,434	-	-	-	-	-	-	-	-	-	-
Period 1a Collateral Costs																					
1a.3	Subtotal Period 1a Collateral Costs	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Period 1a Period-Dependent Costs																					
1a.4.1	Insurance	-	-	-	-	-	-	1,096	110	1,205	1,205	-	-	-	-	-	-	-	-	-	-
1a.4.2	Property taxes	-	-	-	-	-	-	1,580	158	1,738	1,738	-	-	-	-	-	-	-	-	-	-
1a.4.3	Health physics supplies	-	490	-	-	-	-	-	123	613	613	-	-	-	-	-	-	-	-	-	-
1a.4.4	Heavy equipment rental	-	528	-	-	-	-	-	79	608	608	-	-	-	-	-	-	-	-	-	-
1a.4.5	Disposal of DAW generated	-	-	13	4	-	48	-	14	79	79	-	-	-	610	-	-	-	12,190	20	-
1a.4.6	Plant energy budget	-	-	-	-	-	-	3,091	464	3,554	3,554	-	-	-	-	-	-	-	-	-	-
1a.4.7	NRC Fees	-	-	-	-	-	-	1,181	118	1,299	1,299	-	-	-	-	-	-	-	-	-	-
1a.4.8	Emergency Planning Fees	-	-	-	-	-	-	1,484	148	1,632	-	1,632	-	-	-	-	-	-	-	-	-
1a.4.9	Fixed Overhead	-	-	-	-	-	-	1,503	225	1,728	1,728	-	-	-	-	-	-	-	-	-	-
1a.4.10	Spent Fuel Pool O&M	-	-	-	-	-	-	396	59	455	-	455	-	-	-	-	-	-	-	-	-
1a.4.11	ISFSI Operating Costs	-	-	-	-	-	-	48	7	55	-	55	-	-	-	-	-	-	-	-	-
1a.4.12	Railroad Track Maintenance	-	-	-	-	-	-	53	8	61	-	-	61	-	-	-	-	-	-	-	-
1a.4.13	Security Staff Cost	-	-	-	-	-	-	394	59	453	453	-	-	-	-	-	-	-	-	-	12,264
1a.4.14	Utility Staff Cost	-	-	-	-	-	-	21,482	3,222	24,705	24,705	-	-	-	-	-	-	-	-	-	423,400
1a.4	Subtotal Period 1a Period-Dependent Costs	-	1,018	13	4	-	48	32,307	4,795	38,185	35,981	2,142	61	-	610	-	-	-	12,190	20	435,664
1a.0	TOTAL PERIOD 1a COST	-	1,018	13	4	-	48	56,793	8,468	66,343	63,550	2,142	651	-	610	-	-	-	12,190	20	509,417

Prairie Island Nuclear Nuclear Generating Plant
Decommissioning Cost Analysis

Table F-1
Prairie Island DECON Unit 1
200 Years of Spent Fuel Storage and Periodic TN-40 Replacement Decommissioning Cost Estimate
(Thousands of 2014 Dollars)

Activity Index	Activity Description	Decon Cost	Removal Cost	Packaging Costs	Transport Costs	Off-Site Processing Costs	LLRW Disposal Costs	Other Costs	Total Contingency	Total Costs	NRC Lic. Term. Costs	Spent Fuel Management Costs	Site Restoration Costs	Processed Volume Cu. Feet	Burial Volumes				Burial / Processed Wt., Lbs.	Craft Manhours	Utility and Contractor Manhours
															Class A Cu. Feet	Class B Cu. Feet	Class C Cu. Feet	GTCC Cu. Feet			
PERIOD 2a - Large Component Removal																					
Period 2a Direct Decommissioning Activities																					
Nuclear Steam Supply System Removal																					
2a.1.1.1	Reactor Coolant Piping	45	38	6	8	-	144	-	70	313	313	-	-	-	305	-	-	-	34,809	1,414	-
2a.1.1.2	Pressurizer Relief Tank	20	17	4	5	-	88	-	37	172	172	-	-	-	192	-	-	-	21,288	625	-
2a.1.1.3	Reactor Coolant Pumps & Motors	48	56	98	86	-	711	-	238	1,238	1,238	-	-	-	2,332	-	-	-	295,800	2,049	100
2a.1.1.4	Pressurizer	43	64	459	88	-	669	-	264	1,587	1,587	-	-	-	2,196	-	-	-	185,015	2,355	938
2a.1.1.5	Steam Generators	199	2,924	2,014	1,728	1,205	3,449	-	2,334	13,853	13,853	-	-	18,672	11,316	-	-	-	1,668,341	11,617	2,875
2a.1.1.6	CRDMs/ICIs/Service Structure Removal	253	238	210	48	-	736	-	398	1,884	1,884	-	-	-	4,797	-	-	-	177,400	8,104	-
2a.1.1.7	Reactor Vessel Internals	69	2,629	24,947	1,032	-	7,677	255	12,378	48,987	48,987	-	-	-	501	125	673	-	164,922	22,200	1,020
2a.1.1.8	Reactor Vessel	79	4,539	1,669	710	-	1,890	255	5,022	14,163	14,163	-	-	-	5,690	-	-	-	570,074	22,200	1,020
2a.1.1	Totals	756	10,505	29,408	3,705	1,205	15,365	510	20,742	82,195	82,195	-	-	18,672	27,330	125	673	-	3,117,649	70,563	5,953
Removal of Major Equipment																					
2a.1.2	Main Turbine/Generator	-	272	180	58	263	296	-	208	1,277	1,277	-	-	2,131	1,187	-	-	-	206,316	4,667	-
2a.1.3	Main Condensers	-	2,284	115	51	352	435	-	752	3,989	3,989	-	-	3,800	1,587	-	-	-	275,903	39,151	-
Cascading Costs from Clean Building Demolition																					
2a.1.4.1	Reactor	-	991	-	-	-	-	-	149	1,140	1,140	-	-	-	-	-	-	-	-	11,181	-
2a.1.4	Totals	-	991	-	-	-	-	-	149	1,140	1,140	-	-	-	-	-	-	-	-	11,181	-
Disposal of Plant Systems																					
2a.1.5.1	Air Removal	-	25	-	-	-	-	-	4	29	-	-	29	-	-	-	-	-	-	452	-
2a.1.5.2	Auxiliary Feedwater	-	37	-	-	-	-	-	6	42	-	-	42	-	-	-	-	-	-	670	-
2a.1.5.3	Auxiliary Feedwater - RCA	-	37	0	1	18	-	-	12	69	69	-	-	215	-	-	-	-	8,722	601	-
2a.1.5.4	Bleed Steam	-	72	-	-	-	-	-	11	83	-	-	83	-	-	-	-	-	-	1,335	-
2a.1.5.5	Caustic Addition - RCA	-	30	0	1	19	-	-	11	63	63	-	-	233	-	-	-	-	9,453	444	-
2a.1.5.6	Chemical Feed	-	16	-	-	-	-	-	2	18	-	-	18	-	-	-	-	-	-	304	-
2a.1.5.7	Chemical Feed - RCA	-	1	0	0	1	-	-	0	2	2	-	-	6	-	-	-	-	243	12	-
2a.1.5.8	Circulating Water	-	34	-	-	-	-	-	5	39	-	-	39	-	-	-	-	-	-	619	-
2a.1.5.9	Condensate	-	382	-	-	-	-	-	57	440	-	-	440	-	-	-	-	-	-	6,837	-
2a.1.5.10	Condensate Polishing	-	189	-	-	-	-	-	28	218	-	-	218	-	-	-	-	-	-	3,420	-
2a.1.5.11	Condensate Polishing - RCA	-	148	3	13	174	-	-	65	403	403	-	-	2,078	-	-	-	-	84,395	2,329	-
2a.1.5.12	Electro-hydraulic	-	7	-	-	-	-	-	1	8	-	-	8	-	-	-	-	-	-	127	-
2a.1.5.13	Feedwater	-	123	-	-	-	-	-	18	141	-	-	141	-	-	-	-	-	-	2,215	-
2a.1.5.14	Feedwater - RCA	-	157	5	20	268	-	-	83	533	533	-	-	3,208	-	-	-	-	130,294	2,651	-
2a.1.5.15	Gland Seal	-	27	-	-	-	-	-	4	31	-	-	31	-	-	-	-	-	-	505	-
2a.1.5.16	Heater Drain	-	321	-	-	-	-	-	48	370	-	-	370	-	-	-	-	-	-	5,881	-
2a.1.5.17	Internal Circ Water & CDSR	-	21	-	-	-	-	-	3	25	-	-	25	-	-	-	-	-	-	389	-
2a.1.5.18	Main Gen/Exciter/Transformer	-	0	-	-	-	-	-	0	0	-	-	0	-	-	-	-	-	-	5	-
2a.1.5.19	Main Steam	-	93	-	-	-	-	-	14	107	-	-	107	-	-	-	-	-	-	1,690	-
2a.1.5.20	Main Steam - RCA	-	295	8	31	422	-	-	143	899	899	-	-	5,044	-	-	-	-	204,825	4,956	-
2a.1.5.21	Steam Generator Blowdown	-	387	20	23	170	188	-	175	963	963	-	-	2,031	686	-	-	-	127,773	6,667	-
2a.1.5.22	Steam Generators	-	4	-	-	-	-	-	1	5	-	-	5	-	-	-	-	-	-	75	-
2a.1.5.23	Turbine & Moisture Separators	-	312	-	-	-	-	-	47	358	-	-	358	-	-	-	-	-	-	5,609	-
2a.1.5.24	Turbine Oil Purification	-	57	-	-	-	-	-	8	65	-	-	65	-	-	-	-	-	-	1,003	-
2a.1.5	Totals	-	2,776	37	90	1,072	188	-	747	4,910	2,931	-	1,979	12,815	686	-	-	-	565,705	48,794	-
2a.1.6	Scaffolding in support of decommissioning	-	772	3	1	13	3	-	196	988	988	-	-	138	12	-	-	-	7,016	6,368	-
2a.1	Subtotal Period 2a Activity Costs	756	17,600	29,743	3,905	2,905	16,287	510	22,793	94,499	92,520	-	1,979	37,556	30,801	125	673	-	4,172,589	180,724	5,953
Period 2a Additional Costs																					
2a.2.1	Remedial Action Surveys	-	-	-	-	-	-	1,299	390	1,689	1,689	-	-	-	-	-	-	-	-	26,595	-
2a.2	Subtotal Period 2a Additional Costs	-	-	-	-	-	-	1,299	390	1,689	1,689	-	-	-	-	-	-	-	-	26,595	-
Period 2a Collateral Costs																					
2a.3.1	Process decommissioning water waste	47	-	31	79	-	135	-	72	365	365	-	-	-	303	-	-	-	18,203	59	-
2a.3.2	Process decommissioning chemical flush waste	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2a.3.3	Small tool allowance	-	195	-	-	-	-	-	29	224	202	-	22	-	-	-	-	-	-	-	-
2a.3.4	Spent Fuel Capital and Transfer	-	-	-	-	-	-	17,811	2,672	20,482	-	20,482	-	-	-	-	-	-	-	-	-
2a.3.5	On-site survey and release of 0.0 tons clean metallic waste	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2a.3	Subtotal Period 2a Collateral Costs	47	195	31	79	-	135	17,811	2,773	21,071	567	20,482	22	-	303	-	-	-	18,203	59	-

Prairie Island Nuclear Nuclear Generating Plant
Decommissioning Cost Analysis

Table F-1
Prairie Island DECON Unit 1
200 Years of Spent Fuel Storage and Periodic TN-40 Replacement Decommissioning Cost Estimate
(Thousands of 2014 Dollars)

Activity Index	Activity Description	Decon Cost	Removal Cost	Packaging Costs	Transport Costs	Off-Site Processing Costs	LLRW Disposal Costs	Other Costs	Total Contingency	Total Costs	NRC Lic. Term. Costs	Spent Fuel Management Costs	Site Restoration Costs	Processed Volume Cu. Feet	Burial Volumes				Burial / Processed Wt., Lbs.	Craft Manhours	Utility and Contractor Manhours
															Class A Cu. Feet	Class B Cu. Feet	Class C Cu. Feet	GTCC Cu. Feet			
Period 2f Collateral Costs																					
2f.3.1	DOC staff relocation expenses	-	-	-	-	-	-	1,708	256	1,964	1,964	-	-	-	-	-	-	-	-	-	-
2f.3.2	Spent Fuel Capital and Transfer	-	-	-	-	-	-	2,299	345	2,643	-	2,643	-	-	-	-	-	-	-	-	-
2f.3	Subtotal Period 2f Collateral Costs	-	-	-	-	-	-	4,006	601	4,607	1,964	2,643	-	-	-	-	-	-	-	-	-
Period 2f Period-Dependent Costs																					
2f.4.1	Insurance	-	-	-	-	-	-	344	34	379	379	-	-	-	-	-	-	-	-	-	-
2f.4.2	Property taxes	-	-	-	-	-	-	526	53	578	578	-	-	-	-	-	-	-	-	-	-
2f.4.3	Health physics supplies	-	399	-	-	-	-	-	100	499	499	-	-	-	-	-	-	-	-	-	-
2f.4.4	Disposal of DAW generated	-	-	7	2	-	26	-	8	43	43	-	-	-	334	-	-	-	6,685	11	-
2f.4.5	Plant energy budget	-	-	-	-	-	-	462	69	532	532	-	-	-	-	-	-	-	-	-	-
2f.4.6	NRC Fees	-	-	-	-	-	-	452	45	497	497	-	-	-	-	-	-	-	-	-	-
2f.4.7	Emergency Planning Fees	-	-	-	-	-	-	47	5	52	-	52	-	-	-	-	-	-	-	-	-
2f.4.8	Fixed Overhead	-	-	-	-	-	-	917	138	1,054	1,054	-	-	-	-	-	-	-	-	-	-
2f.4.9	ISFSI Operating Costs	-	-	-	-	-	-	36	5	41	-	41	-	-	-	-	-	-	-	-	-
2f.4.10	Railroad Track Maintenance	-	-	-	-	-	-	40	6	46	-	-	46	-	-	-	-	-	-	-	-
2f.4.11	Security Staff Cost	-	-	-	-	-	-	1,010	151	1,161	1,161	-	-	-	-	-	-	-	-	-	27,690
2f.4.12	DOC Staff Cost	-	-	-	-	-	-	3,451	518	3,969	3,969	-	-	-	-	-	-	-	-	-	46,410
2f.4.13	Utility Staff Cost	-	-	-	-	-	-	3,345	502	3,847	3,847	-	-	-	-	-	-	-	-	-	59,670
2f.4	Subtotal Period 2f Period-Dependent Costs	-	399	7	2	-	26	10,630	1,633	12,698	12,559	93	46	-	334	-	-	-	6,685	11	133,770
2f.0	TOTAL PERIOD 2f COST	-	399	7	2	-	26	17,288	3,030	20,752	17,970	2,737	46	-	334	-	-	-	6,685	40,183	136,890
PERIOD 2 TOTALS		4,460	47,044	31,030	6,438	11,235	33,544	298,305	80,126	512,182	350,359	155,878	5,945	138,709	118,618	125	673	-	13,153,630	582,700	1,570,492
PERIOD 3b - Site Restoration																					
Period 3b Direct Decommissioning Activities																					
Demolition of Remaining Site Buildings																					
3b.1.1.1	Reactor	-	5,733	-	-	-	-	-	860	6,593	-	-	6,593	-	-	-	-	-	-	65,023	-
3b.1.1.2	Condensate Storage Tank Foundation	-	7	-	-	-	-	-	1	8	-	-	8	-	-	-	-	-	-	95	-
3b.1.1.3	Turbine	-	2,598	-	-	-	-	-	390	2,988	-	-	2,988	-	-	-	-	-	-	34,340	-
3b.1.1.4	Turbine Pedestal	-	818	-	-	-	-	-	123	941	-	-	941	-	-	-	-	-	-	7,580	-
3b.1.1	Totals	-	9,157	-	-	-	-	-	1,374	10,530	-	-	10,530	-	-	-	-	-	-	107,039	-
Site Closeout Activities																					
3b.1.2	Grade & landscape site	-	432	-	-	-	-	-	65	497	-	-	497	-	-	-	-	-	-	921	-
3b.1.3	Final report to NRC	-	-	-	-	-	-	177	27	204	204	-	-	-	-	-	-	-	-	-	1,560
3b.1	Subtotal Period 3b Activity Costs	-	9,589	-	-	-	-	177	1,465	11,231	204	-	11,027	-	-	-	-	-	-	107,959	1,560
Period 3b Additional Costs																					
3b.2.1	Concrete Crushing	-	231	-	-	-	-	3	35	268	-	-	268	-	-	-	-	-	-	1,096	-
3b.2.2	Underground Services Excavations	-	830	-	-	-	-	392	183	1,406	-	-	1,406	-	-	-	-	-	-	7,407	-
3b.2.3	Intake Structure cofferdam	-	572	-	-	-	-	-	86	657	-	-	657	-	-	-	-	-	-	5,079	-
3b.2	Subtotal Period 3b Additional Costs	-	1,633	-	-	-	-	395	304	2,332	-	-	2,332	-	-	-	-	-	-	13,582	-
Period 3b Collateral Costs																					
3b.3.1	Small tool allowance	-	117	-	-	-	-	-	17	134	-	-	134	-	-	-	-	-	-	-	-
3b.3.2	Spent Fuel Capital and Transfer	-	-	-	-	-	-	19,000	2,850	21,850	-	21,850	-	-	-	-	-	-	-	-	-
3b.3.3	Fixed Overhead - SR	-	-	-	-	-	-	1,141	171	1,313	-	-	1,313	-	-	-	-	-	-	-	-
3b.3	Subtotal Period 3b Collateral Costs	-	117	-	-	-	-	20,141	3,039	23,297	-	21,850	1,447	-	-	-	-	-	-	-	-
Period 3b Period-Dependent Costs																					
3b.4.1	Insurance	-	-	-	-	-	-	488	49	537	-	537	-	-	-	-	-	-	-	-	-
3b.4.2	Property taxes	-	-	-	-	-	-	1,315	131	1,446	0	1,301	145	-	-	-	-	-	-	-	-
3b.4.3	Heavy equipment rental	-	6,056	-	-	-	-	-	908	6,965	-	-	6,965	-	-	-	-	-	-	-	-
3b.4.4	Plant energy budget	-	-	-	-	-	-	655	98	754	-	-	754	-	-	-	-	-	-	-	-
3b.4.5	NRC ISFSI Fees	-	-	-	-	-	-	385	39	424	-	424	-	-	-	-	-	-	-	-	-
3b.4.6	Emergency Planning Fees	-	-	-	-	-	-	134	13	148	-	148	-	-	-	-	-	-	-	-	-
3b.4.7	ISFSI Operating Costs	-	-	-	-	-	-	101	15	116	-	116	-	-	-	-	-	-	-	-	-
3b.4.8	Railroad Track Maintenance	-	-	-	-	-	-	113	17	130	-	-	130	-	-	-	-	-	-	-	-
3b.4.9	Security Staff Cost	-	-	-	-	-	-	2,738	411	3,148	(0)	2,582	567	-	-	-	-	-	-	-	74,658
3b.4.10	DOC Staff Cost	-	-	-	-	-	-	8,847	1,327	10,174	-	-	10,174	-	-	-	-	-	-	-	117,206
3b.4.11	Utility Staff Cost	-	-	-	-	-	-	4,553	683	5,236	-	943	4,294	-	-	-	-	-	-	-	76,869
3b.4	Subtotal Period 3b Period-Dependent Costs	-	6,056	-	-	-	-	19,330	3,692	29,078	(0)	6,050	23,028	-	-	-	-	-	-	-	268,733
3b.0	TOTAL PERIOD 3b COST	-	17,394	-	-	-	-	40,043	8,500	65,937	204	27,900	37,833	-	-	-	-	-	-	121,542	270,293

Prairie Island Nuclear Nuclear Generating Plant
Decommissioning Cost Analysis

Table F-1
Prairie Island DECON Unit 1
200 Years of Spent Fuel Storage and Periodic TN-40 Replacement Decommissioning Cost Estimate
(Thousands of 2014 Dollars)

Activity Index	Activity Description	Decon Cost	Removal Cost	Packaging Costs	Transport Costs	Off-Site Processing Costs	LLRW Disposal Costs	Other Costs	Total Contingency	Total Costs	NRC Lic. Term. Costs	Spent Fuel Management Costs	Site Restoration Costs	Processed Volume Cu. Feet	Burial Volumes				Burial / Processed Wt., Lbs.	Craft Manhours	Utility and Contractor Manhours
															Class A Cu. Feet	Class B Cu. Feet	Class C Cu. Feet	GTCC Cu. Feet			
PERIOD 3c - Fuel Storage Operations/Shipping																					
Period 3c Direct Decommissioning Activities																					
Period 3c Additional Costs																					
3c.2.1	ISFSI Disposition of Original Casks	-	-	-	6,407	-	53,424	-	14,317	74,148	-	74,148	-	-	175,294	-	-	-	27,783,000	-	-
3c.2	Subtotal Period 3c Additional Costs	-	-	-	6,407	-	53,424	-	14,317	74,148	-	74,148	-	-	175,294	-	-	-	27,783,000	-	-
Period 3c Collateral Costs																					
3c.3.1	Spent Fuel Capital and Transfer	-	-	-	-	-	-	810,724	121,609	932,333	-	932,333	-	-	-	-	-	-	-	-	-
3c.3	Subtotal Period 3c Collateral Costs	-	-	-	-	-	-	810,724	121,609	932,333	-	932,333	-	-	-	-	-	-	-	-	-
Period 3c Period-Dependent Costs																					
3c.4.1	Insurance	-	-	-	-	-	-	31,681	3,168	34,849	-	34,849	-	-	-	-	-	-	-	-	-
3c.4.2	Property taxes	-	-	-	-	-	-	76,923	7,692	84,615	-	84,615	-	-	-	-	-	-	-	-	-
3c.4.3	Plant energy budget	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
3c.4.4	NRC ISFSI Fees	-	-	-	-	-	-	24,995	2,499	27,494	-	27,494	-	-	-	-	-	-	-	-	-
3c.4.5	Emergency Planning Fees	-	-	-	-	-	-	8,703	870	9,573	-	9,573	-	-	-	-	-	-	-	-	-
3c.4.6	Fixed Overhead	-	-	-	-	-	-	74,068	11,110	85,178	-	85,178	-	-	-	-	-	-	-	-	-
3c.4.7	ISFSI Operating Costs	-	-	-	-	-	-	6,570	986	7,556	-	7,556	-	-	-	-	-	-	-	-	-
3c.4.8	Railroad Track Maintenance	-	-	-	-	-	-	7,340	1,101	8,441	-	8,441	-	-	-	-	-	-	-	-	-
3c.4.9	Security Staff Cost	-	-	-	-	-	-	146,509	21,976	168,486	-	168,486	-	-	-	-	-	-	-	-	3,874,963
3c.4.10	DOC Staff Cost	-	-	-	-	-	-	13,713	2,057	15,770	-	15,770	-	-	-	-	-	-	-	-	143,517
3c.4.11	Utility Staff Cost	-	-	-	-	-	-	96,594	14,489	111,083	-	111,083	-	-	-	-	-	-	-	-	1,903,037
3c.4	Subtotal Period 3c Period-Dependent Costs	-	-	-	-	-	-	487,097	65,949	553,046	-	553,046	-	-	-	-	-	-	-	-	5,921,517
3c.0	TOTAL PERIOD 3c COST	-	-	-	6,407	-	53,424	1,297,821	201,875	1,559,527	-	1,559,527	-	-	175,294	-	-	-	27,783,000	-	5,921,517
PERIOD 3d - GTCC shipping																					
Period 3d Direct Decommissioning Activities																					
Nuclear Steam Supply System Removal																					
3d.1.1.1	Vessel & Internals GTCC Disposal	-	-	1,170	-	-	8,337	-	1,543	11,050	11,050	-	-	-	-	-	-	3,746	839,261	-	-
3d.1.1	Totals	-	-	1,170	-	-	8,337	-	1,543	11,050	11,050	-	-	-	-	-	-	3,746	839,261	-	-
3d.1	Subtotal Period 3d Activity Costs	-	-	1,170	-	-	8,337	-	1,543	11,050	11,050	-	-	-	-	-	-	3,746	839,261	-	-
Period 3d Collateral Costs																					
3d.3.1	Spent Fuel Capital and Transfer	-	-	-	-	-	-	82,249	12,337	94,587	-	94,587	-	-	-	-	-	-	-	-	-
3d.3	Subtotal Period 3d Collateral Costs	-	-	-	-	-	-	82,249	12,337	94,587	-	94,587	-	-	-	-	-	-	-	-	-
Period 3d Period-Dependent Costs																					
3d.4.1	Insurance	-	-	-	-	-	-	6,219	622	6,841	-	6,841	-	-	-	-	-	-	-	-	-
3d.4.2	Property taxes	-	-	-	-	-	-	15,102	1,510	16,612	-	16,612	-	-	-	-	-	-	-	-	-
3d.4.3	Plant energy budget	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
3d.4.4	NRC ISFSI Fees	-	-	-	-	-	-	4,907	491	5,398	-	5,398	-	-	-	-	-	-	-	-	-
3d.4.5	Emergency Planning Fees	-	-	-	-	-	-	1,709	171	1,879	-	1,879	-	-	-	-	-	-	-	-	-
3d.4.6	Fixed Overhead	-	-	-	-	-	-	14,541	2,181	16,722	-	16,722	-	-	-	-	-	-	-	-	-
3d.4.7	ISFSI Operating Costs	-	-	-	-	-	-	1,290	193	1,483	-	1,483	-	-	-	-	-	-	-	-	-
3d.4.8	Railroad Track Maintenance	-	-	-	-	-	-	1,639	246	1,885	-	1,885	-	-	-	-	-	-	-	-	-
3d.4.9	Security Staff Cost	-	-	-	-	-	-	28,762	4,314	33,076	-	33,076	-	-	-	-	-	-	-	-	760,706
3d.4.10	Utility Staff Cost	-	-	-	-	-	-	10,039	1,506	11,544	-	11,544	-	-	-	-	-	-	-	-	190,458
3d.4	Subtotal Period 3d Period-Dependent Costs	-	-	-	-	-	-	84,206	11,234	95,441	-	95,441	-	-	-	-	-	-	-	-	951,164
3d.0	TOTAL PERIOD 3d COST	-	-	1,170	-	-	8,337	166,456	25,115	201,078	11,050	190,027	-	-	-	-	-	3,746	839,261	-	951,164
PERIOD 3e - ISFSI Decontamination																					
Period 3e Direct Decommissioning Activities																					
Period 3e Additional Costs																					
3e.2.1	Decommissioning of ISFSI	14	1	3	2	-	18	629	167	834	834	-	-	-	125	-	-	-	8,916	3,452	828
3e.2	Subtotal Period 3e Additional Costs	14	1	3	2	-	18	629	167	834	834	-	-	-	125	-	-	-	8,916	3,452	828
Period 3e Collateral Costs																					
3e.3	Subtotal Period 3e Collateral Costs	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-

Prairie Island Nuclear Nuclear Generating Plant
Decommissioning Cost Analysis

Table F-2
Prairie Island DECON Unit 2
200 Years of Spent Fuel Storage and Periodic TN-40 Replacement Decommissioning Cost Estimate
(Thousands of 2014 Dollars)

Activity Index	Activity Description	Decon Cost	Removal Cost	Packaging Costs	Transport Costs	Off-Site Processing Costs	LLRW Disposal Costs	Other Costs	Total Contingency	Total Costs	NRC Lic. Term. Costs	Spent Fuel Management Costs	Site Restoration Costs	Processed Volume Cu. Feet	Burial Volumes				Burial / Processed Wt., Lbs.	Craft Manhours	Utility and Contractor Manhours
															Class A Cu. Feet	Class B Cu. Feet	Class C Cu. Feet	GTCC Cu. Feet			
PERIOD 1a - Shutdown through Transition																					
Period 1a Direct Decommissioning Activities																					
1a.1.1	Prepare preliminary decommissioning cost	-	-	-	-	-	-	63	9	73	73	-	-	-	-	-	-	-	-	-	556
1a.1.2	Notification of Cessation of Operations									a											
1a.1.3	Remove fuel & source material									n/a											
1a.1.4	Notification of Permanent Defueling									a											
1a.1.5	Deactivate plant systems & process waste									a											
1a.1.6	Prepare and submit PSDAR	-	-	-	-	-	-	97	15	112	112	-	-	-	-	-	-	-	-	-	855
1a.1.7	Review plant dwgs & specs.	-	-	-	-	-	-	223	33	257	257	-	-	-	-	-	-	-	-	-	1,967
1a.1.8	Perform detailed rad survey									a											
1a.1.9	Estimate by-product inventory	-	-	-	-	-	-	49	7	56	56	-	-	-	-	-	-	-	-	-	428
1a.1.10	End product description	-	-	-	-	-	-	49	7	56	56	-	-	-	-	-	-	-	-	-	428
1a.1.11	Detailed by-product inventory	-	-	-	-	-	-	63	9	73	73	-	-	-	-	-	-	-	-	-	556
1a.1.12	Define major work sequence	-	-	-	-	-	-	364	55	419	419	-	-	-	-	-	-	-	-	-	3,207
1a.1.13	Perform SER and EA	-	-	-	-	-	-	150	23	173	173	-	-	-	-	-	-	-	-	-	1,326
1a.1.14	Perform Site-Specific Cost Study	-	-	-	-	-	-	243	36	279	279	-	-	-	-	-	-	-	-	-	2,138
1a.1.15	Prepare/submit License Termination Plan	-	-	-	-	-	-	199	30	229	229	-	-	-	-	-	-	-	-	-	1,751
1a.1.16	Receive NRC approval of termination plan									a											
Activity Specifications																					
1a.1.17.1	Plant & temporary facilities	-	-	-	-	-	-	239	36	275	247	-	27	-	-	-	-	-	-	-	2,104
1a.1.17.2	Plant systems	-	-	-	-	-	-	202	30	233	209	-	23	-	-	-	-	-	-	-	1,782
1a.1.17.3	NSSS Decontamination Flush	-	-	-	-	-	-	24	4	28	28	-	-	-	-	-	-	-	-	-	214
1a.1.17.4	Reactor internals	-	-	-	-	-	-	345	52	396	396	-	-	-	-	-	-	-	-	-	3,036
1a.1.17.5	Reactor vessel	-	-	-	-	-	-	316	47	363	363	-	-	-	-	-	-	-	-	-	2,779
1a.1.17.6	Biological shield	-	-	-	-	-	-	24	4	28	28	-	-	-	-	-	-	-	-	-	214
1a.1.17.7	Steam generators	-	-	-	-	-	-	151	23	174	174	-	-	-	-	-	-	-	-	-	1,334
1a.1.17.8	Reinforced concrete	-	-	-	-	-	-	78	12	89	45	-	45	-	-	-	-	-	-	-	684
1a.1.17.9	Main Turbine	-	-	-	-	-	-	19	3	22	-	-	22	-	-	-	-	-	-	-	171
1a.1.17.10	Main Condensers	-	-	-	-	-	-	19	3	22	-	-	22	-	-	-	-	-	-	-	171
1a.1.17.11	Plant structures & buildings	-	-	-	-	-	-	151	23	174	87	-	87	-	-	-	-	-	-	-	1,334
1a.1.17.12	Waste management	-	-	-	-	-	-	223	33	257	257	-	-	-	-	-	-	-	-	-	1,967
1a.1.17.13	Facility & site closeout	-	-	-	-	-	-	44	7	50	25	-	25	-	-	-	-	-	-	-	385
1a.1.17	Total	-	-	-	-	-	-	1,836	275	2,112	1,859	-	252	-	-	-	-	-	-	-	16,175
Planning & Site Preparations																					
1a.1.18	Prepare dismantling sequence	-	-	-	-	-	-	117	17	134	134	-	-	-	-	-	-	-	-	-	1,026
1a.1.19	Plant prep. & temp. svces	-	-	-	-	-	-	3,000	450	3,450	3,450	-	-	-	-	-	-	-	-	-	-
1a.1.20	Design water clean-up system	-	-	-	-	-	-	68	10	78	78	-	-	-	-	-	-	-	-	-	599
1a.1.21	Rigging/Cont. Cntrl Envlp/s/tooling/etc.	-	-	-	-	-	-	2,300	345	2,645	2,645	-	-	-	-	-	-	-	-	-	-
1a.1.22	Procure casks/liners & containers	-	-	-	-	-	-	60	9	69	69	-	-	-	-	-	-	-	-	-	526
1a.1	Subtotal Period 1a Activity Costs	-	-	-	-	-	-	8,880	1,332	10,212	9,960	-	252	-	-	-	-	-	-	-	31,537
Period 1a Additional Costs																					
1a.2.1	Spent Fuel Pool Isolation	-	-	-	-	-	-	7,208	1,081	8,290	8,290	-	-	-	-	-	-	-	-	-	-
1a.2	Subtotal Period 1a Additional Costs	-	-	-	-	-	-	7,208	1,081	8,290	8,290	-	-	-	-	-	-	-	-	-	-
Period 1a Collateral Costs																					
1a.3.1	Spent Fuel Capital and Transfer	-	-	-	-	-	-	15,192	2,279	17,471	-	17,471	-	-	-	-	-	-	-	-	-
1a.3	Subtotal Period 1a Collateral Costs	-	-	-	-	-	-	15,192	2,279	17,471	-	17,471	-	-	-	-	-	-	-	-	-
Period 1a Period-Dependent Costs																					
1a.4.1	Insurance	-	-	-	-	-	-	1,096	110	1,205	1,205	-	-	-	-	-	-	-	-	-	-
1a.4.2	Property taxes	-	-	-	-	-	-	1,580	158	1,738	1,738	-	-	-	-	-	-	-	-	-	-
1a.4.3	Health physics supplies	-	461	-	-	-	-	-	115	576	576	-	-	-	-	-	-	-	-	-	-
1a.4.4	Heavy equipment rental	-	528	-	-	-	-	-	79	608	608	-	-	-	-	-	-	-	-	-	-
1a.4.5	Disposal of DAW generated	-	-	12	4	-	44	-	13	73	73	-	-	-	565	-	-	-	11,299	18	-
1a.4.6	Plant energy budget	-	-	-	-	-	-	3,091	464	3,554	3,554	-	-	-	-	-	-	-	-	-	-
1a.4.7	NRC Fees	-	-	-	-	-	-	834	83	917	917	-	-	-	-	-	-	-	-	-	-
1a.4.8	Emergency Planning Fees	-	-	-	-	-	-	1,484	148	1,632	-	1,632	-	-	-	-	-	-	-	-	-
1a.4.9	Fixed Overhead	-	-	-	-	-	-	1,503	225	1,728	1,728	-	-	-	-	-	-	-	-	-	-
1a.4.10	Spent Fuel Pool O&M	-	-	-	-	-	-	396	59	455	-	455	-	-	-	-	-	-	-	-	-
1a.4.11	ISFSI Operating Costs	-	-	-	-	-	-	48	7	55	-	55	-	-	-	-	-	-	-	-	-
1a.4.12	Railroad Track Maintenance	-	-	-	-	-	-	53	8	61	-	-	61	-	-	-	-	-	-	-	-
1a.4.13	Security Staff Cost	-	-	-	-	-	-	5,383	807	6,190	6,190	-	-	-	-	-	-	-	-	-	157,471
1a.4.14	Utility Staff Cost	-	-	-	-	-	-	17,164	2,575	19,739	19,739	-	-	-	-	-	-	-	-	-	346,229
1a.4	Subtotal Period 1a Period-Dependent Costs	-	990	12	4	-	44	32,630	4,852	38,532	36,329	2,142	61	-	565	-	-	-	11,299	18	503,700

Table F-2
Prairie Island DECON Unit 2
200 Years of Spent Fuel Storage and Periodic TN-40 Replacement Decommissioning Cost Estimate
(Thousands of 2014 Dollars)

Activity Index	Activity Description	Decon Cost	Removal Cost	Packaging Costs	Transport Costs	Off-Site Processing Costs	LLRW Disposal Costs	Other Costs	Total Contingency	Total Costs	NRC Lic. Term. Costs	Spent Fuel Management Costs	Site Restoration Costs	Processed Volume Cu. Feet	Burial Volumes				Burial / Processed Wt., Lbs.	Craft Manhours	Utility and Contractor Manhours
															Class A Cu. Feet	Class B Cu. Feet	Class C Cu. Feet	GTCC Cu. Feet			
Period 2a Collateral Costs																					
2a.3.1	Process decommissioning water waste	49	-	32	82	-	140	-	75	378	378	-	-	-	314	-	-	-	18,829	61	-
2a.3.2	Process decommissioning chemical flush waste	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2a.3.3	Small tool allowance	-	219	-	-	-	-	-	33	252	227	-	25	-	-	-	-	-	-	-	-
2a.3.4	Spent Fuel Capital and Transfer	-	-	-	-	-	-	8,802	1,320	10,123	-	10,123	-	-	-	-	-	-	-	-	-
2a.3.5	On-site survey and release of 0.0 tons clean metallic waste	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2a.3	Subtotal Period 2a Collateral Costs	49	219	32	82	-	140	8,802	1,428	10,752	604	10,123	25	-	314	-	-	-	18,829	61	-
Period 2a Period-Dependent Costs																					
2a.4.1	Decon supplies	66	-	-	-	-	-	-	17	83	83	-	-	-	-	-	-	-	-	-	-
2a.4.2	Insurance	-	-	-	-	-	-	615	62	677	677	-	-	-	-	-	-	-	-	-	-
2a.4.3	Property taxes	-	-	-	-	-	-	1,839	184	2,023	1,821	-	202	-	-	-	-	-	-	-	-
2a.4.4	Health physics supplies	-	1,680	-	-	-	-	-	420	2,100	2,100	-	-	-	-	-	-	-	-	-	-
2a.4.5	Heavy equipment rental	-	2,498	-	-	-	-	-	375	2,873	2,873	-	-	-	-	-	-	-	-	-	-
2a.4.6	Disposal of DAW generated	-	-	85	28	-	323	-	94	530	530	-	-	-	4,113	-	-	-	82,265	134	-
2a.4.7	Plant energy budget	-	-	-	-	-	-	3,612	542	4,154	4,154	-	-	-	-	-	-	-	-	-	-
2a.4.8	NRC Fees	-	-	-	-	-	-	536	54	590	590	-	-	-	-	-	-	-	-	-	-
2a.4.9	Emergency Planning Fees	-	-	-	-	-	-	1,461	146	1,607	-	1,607	-	-	-	-	-	-	-	-	-
2a.4.10	Fixed Overhead	-	-	-	-	-	-	1,508	226	1,734	1,734	-	-	-	-	-	-	-	-	-	-
2a.4.11	Spent Fuel Pool O&M	-	-	-	-	-	-	487	73	560	-	560	-	-	-	-	-	-	-	-	-
2a.4.12	ISFSI Operating Costs	-	-	-	-	-	-	59	9	68	-	68	-	-	-	-	-	-	-	-	-
2a.4.13	Railroad Track Maintenance	-	-	-	-	-	-	264	40	304	-	-	304	-	-	-	-	-	-	-	-
2a.4.14	Security Staff Cost	-	-	-	-	-	-	5,611	842	6,452	6,452	-	-	-	-	-	-	-	-	-	162,281
2a.4.15	DOC Staff Cost	-	-	-	-	-	-	14,153	2,123	16,276	16,276	-	-	-	-	-	-	-	-	-	194,994
2a.4.16	Utility Staff Cost	-	-	-	-	-	-	19,180	2,877	22,057	22,057	-	-	-	-	-	-	-	-	-	363,049
2a.4	Subtotal Period 2a Period-Dependent Costs	66	4,178	85	28	-	323	49,325	8,081	62,086	59,346	2,234	506	-	4,113	-	-	-	82,265	134	720,324
2a.0	TOTAL PERIOD 2a COST	867	24,276	23,856	3,950	3,003	16,196	59,859	31,282	163,287	148,038	12,356	2,892	38,625	35,251	125	617	-	4,304,096	234,334	726,171
PERIOD 2b - Site Decontamination																					
Period 2b Direct Decommissioning Activities																					
Disposal of Plant Systems																					
2b.1.1.1	ADT & Misc Ventilation	-	20	0	1	13	2	-	8	45	45	-	-	153	9	-	-	-	6,814	363	-
2b.1.1.2	Aux Bldg Normal Ventilation	-	57	2	5	58	11	-	27	159	159	-	-	692	39	-	-	-	30,671	1,013	-
2b.1.1.3	Aux Bldg Special Ventilation	-	11	0	1	6	2	-	4	24	24	-	-	70	6	-	-	-	3,243	197	-
2b.1.1.4	Battery Rm Special Ventilation	-	1	-	-	-	-	-	0	2	-	-	2	-	-	-	-	-	-	24	-
2b.1.1.5	Boron Recycle	0	3	0	0	0	2	-	2	8	8	-	-	3	9	-	-	-	709	50	-
2b.1.1.6	Chemical & Volume Control	624	762	57	45	197	540	-	679	2,903	2,903	-	-	2,356	1,977	-	-	-	225,854	23,197	-
2b.1.1.7	Cold Chemical Lab Ventilation	-	1	-	-	-	-	-	0	1	-	-	1	-	-	-	-	-	-	9	-
2b.1.1.8	Component Cooling - RCA	-	521	19	75	1,004	-	-	294	1,912	1,912	-	-	11,996	-	-	-	-	487,169	8,583	-
2b.1.1.9	Containment Cooling	-	28	-	-	-	-	-	4	32	-	-	32	-	-	-	-	-	-	502	-
2b.1.1.10	Containment Cooling - RCA	-	242	4	17	229	-	-	98	591	591	-	-	2,743	-	-	-	-	111,390	3,949	-
2b.1.1.11	Containment Hydrogen Control - RCA	-	29	0	1	12	-	-	9	52	52	-	-	141	-	-	-	-	5,742	494	-
2b.1.1.12	Containment Spray - RCA	-	155	2	9	122	-	-	58	346	346	-	-	1,453	-	-	-	-	59,019	2,617	-
2b.1.1.13	Containment Ventilation	-	191	22	40	395	198	-	165	1,011	1,011	-	-	4,721	722	-	-	-	239,450	3,375	-
2b.1.1.14	Control/Relay/Cmptr Rm Vent	-	26	1	2	22	6	-	11	67	67	-	-	260	20	-	-	-	11,915	454	-
2b.1.1.15	Cooling Water	-	128	-	-	-	-	-	19	147	-	-	147	-	-	-	-	-	-	2,344	-
2b.1.1.16	Cooling Water - RCA	-	385	13	52	706	-	-	211	1,368	1,368	-	-	8,442	-	-	-	-	342,822	6,311	-
2b.1.1.17	Cranes/Hoists/Elevators - RCA	-	3	0	1	9	-	-	2	14	14	-	-	103	-	-	-	-	4,184	48	-
2b.1.1.18	D3 Emergency Diesel	-	8	-	-	-	-	-	1	9	-	-	9	-	-	-	-	-	-	141	-
2b.1.1.19	D4 Emergency Diesel	-	8	-	-	-	-	-	1	9	-	-	9	-	-	-	-	-	-	141	-
2b.1.1.20	D5 Emergency Diesel	-	0	-	-	-	-	-	0	0	-	-	0	-	-	-	-	-	-	5	-
2b.1.1.21	Electrical - Clean	-	1,389	-	-	-	-	-	208	1,597	-	-	1,597	-	-	-	-	-	-	24,276	-
2b.1.1.22	Electrical - Contaminated	-	380	4	14	167	21	-	128	714	714	-	-	1,997	75	-	-	-	86,080	6,503	-
2b.1.1.23	Electrical - Decontaminated	-	2,332	29	117	1,569	-	-	839	4,885	4,885	-	-	18,753	-	-	-	-	761,569	38,423	-
2b.1.1.24	Filter Rm Ventilation	-	4	0	0	2	0	-	1	8	8	-	-	24	1	-	-	-	1,020	69	-
2b.1.1.25	Fire Protection & Detection	-	164	-	-	-	-	-	25	188	-	-	188	-	-	-	-	-	-	3,009	-
2b.1.1.26	Fire Protection & Detection - RCA	-	197	3	11	153	-	-	74	438	438	-	-	1,828	-	-	-	-	74,245	3,134	-
2b.1.1.27	Fuel Handling	-	61	1	2	17	14	-	21	116	116	-	-	200	49	-	-	-	11,396	1,101	-
2b.1.1.28	Fuel Oil	-	1	-	-	-	-	-	0	1	-	-	1	-	-	-	-	-	-	9	-
2b.1.1.29	HVAC - Clean	-	121	-	-	-	-	-	18	139	-	-	139	-	-	-	-	-	-	2,373	-
2b.1.1.30	HVAC - Contaminated	-	1,038	24	73	899	111	-	436	2,581	2,581	-	-	10,745	405	-	-	-	463,144	16,579	-
2b.1.1.31	Heating	-	257	-	-	-	-	-	39	296	-	-	296	-	-	-	-	-	-	4,804	-
2b.1.1.32	Heating - RCA	-	270	3	12	160	-	-	93	538	538	-	-	1,907	-	-	-	-	77,458	4,086	-
2b.1.1.33	Hot Lab & Sample Rm Ventilation	-	16	0	1	9	1	-	6	33	33	-	-	107	4	-	-	-	4,632	285	-
2b.1.1.34	Incore Instrumentation	0	24	1	1	5	16	-	11	60	60	-	-	60	58	-	-	-	6,264	458	-
2b.1.1.35	Misc Drains & Vents	-	189	11	9	38	117	-	85	450	450	-	-	458	426	-	-	-	46,850	3,180	-

Table F-2
Prairie Island DECON Unit 2
200 Years of Spent Fuel Storage and Periodic TN-40 Replacement Decommissioning Cost Estimate
(Thousands of 2014 Dollars)

Activity Index	Activity Description	Decon Cost	Removal Cost	Packaging Costs	Transport Costs	Off-Site Processing Costs	LLRW Disposal Costs	Other Costs	Total Contingency	Total Costs	NRC Lic. Term. Costs	Spent Fuel Management Costs	Site Restoration Costs	Processed Volume Cu. Feet	Burial Volumes				Burial / Processed Wt., Lbs.	Craft Manhours	Utility and Contractor Manhours
															Class A Cu. Feet	Class B Cu. Feet	Class C Cu. Feet	GTCC Cu. Feet			
Disposal of Plant Systems (continued)																					
2b.1.1.36	Misc Lab & Service Areas Vent	-	104	8	6	31	67	-	49	265	265	-	-	370	244	-	-	-	31,186	1,713	-
2b.1.1.37	Miscellaneous Gas	-	58	-	-	-	-	-	9	66	-	-	66	-	-	-	-	-	-	1,073	-
2b.1.1.38	Miscellaneous Gas - RCA	-	107	1	4	50	-	-	35	197	197	-	-	600	-	-	-	-	24,378	1,636	-
2b.1.1.39	Radiation Monitoring	-	6	-	-	-	-	-	1	7	-	-	7	-	-	-	-	-	-	111	-
2b.1.1.40	Radiation Monitoring - RCA	-	52	0	2	26	-	-	17	98	98	-	-	316	-	-	-	-	12,826	782	-
2b.1.1.41	Reactor Coolant	135	190	19	13	19	201	-	172	749	749	-	-	229	730	-	-	-	57,672	5,517	-
2b.1.1.42	Reactor Hot Sampling	116	102	10	5	5	86	-	107	430	430	-	-	54	312	-	-	-	22,919	3,686	-
2b.1.1.43	Reactor Makeup	-	33	-	-	-	-	-	5	38	-	-	38	-	-	-	-	-	-	583	-
2b.1.1.44	Reactor Makeup - RCA	-	3	0	0	2	-	-	1	7	7	-	-	28	-	-	-	-	1,148	47	-
2b.1.1.45	Reactor Vessel	8	14	0	0	2	4	-	9	37	37	-	-	22	14	-	-	-	1,826	385	-
2b.1.1.46	Residual Heat Removal	302	318	81	68	239	891	-	508	2,406	2,406	-	-	2,853	3,244	-	-	-	330,651	7,112	-
2b.1.1.47	Safeguards Chilled Water	-	4	-	-	-	-	-	1	5	-	-	5	-	-	-	-	-	-	75	-
2b.1.1.48	Safety Injection	-	712	38	59	559	317	-	354	2,039	2,039	-	-	6,676	1,161	-	-	-	347,600	12,284	-
2b.1.1.49	Sampling	-	42	3	2	3	26	-	18	94	94	-	-	37	93	-	-	-	7,697	714	-
2b.1.1.50	Service Bldg & New Cmptr Vent	-	0	-	-	-	-	-	0	0	-	-	0	-	-	-	-	-	-	6	-
2b.1.1.51	Shield Bldg Ventilation	-	98	13	20	170	133	-	87	520	520	-	-	2,028	484	-	-	-	114,378	1,743	-
2b.1.1.52	Station & Instrument Air	-	129	-	-	-	-	-	19	148	-	-	148	-	-	-	-	-	-	2,424	-
2b.1.1.53	Station & Instrument Air - RCA	-	240	3	10	136	-	-	82	471	471	-	-	1,625	-	-	-	-	65,986	3,638	-
2b.1.1.54	Turbine Bldg Traps & Drains	-	24	-	-	-	-	-	4	28	-	-	28	-	-	-	-	-	-	462	-
2b.1.1.55	Turbine Bldg Traps & Drains - RCA	-	24	0	1	15	-	-	8	48	48	-	-	180	-	-	-	-	7,321	344	-
2b.1.1.56	Turbine Bldg Ventilation	-	37	-	-	-	-	-	6	43	-	-	43	-	-	-	-	-	-	655	-
2b.1.1.57	Unit Coolers	-	18	-	-	-	-	-	3	21	-	-	21	-	-	-	-	-	-	332	-
2b.1.1.58	Unit Coolers - RCA	-	45	0	1	19	-	-	14	80	80	-	-	232	-	-	-	-	9,413	690	-
2b.1.1.59	Waste Gas Disposal	461	390	39	36	205	368	-	460	1,959	1,959	-	-	2,453	1,358	-	-	-	188,334	14,308	-
2b.1.1.60	Waste Liquid Disposal	1,194	1,455	105	78	306	983	-	1,275	5,397	5,397	-	-	3,655	3,594	-	-	-	385,370	44,485	-
2b.1.1.61	Waste Solid Disposal	96	118	11	8	33	108	-	112	485	485	-	-	389	393	-	-	-	41,732	3,481	-
2b.1.1	Totals	2,936	13,345	528	803	7,610	4,225	-	6,934	36,382	33,604	-	2,777	90,963	15,429	-	-	-	4,712,076	270,390	-
2b.1.2	Scaffolding in support of decommissioning	-	3,130	29	10	117	31	-	812	4,129	4,129	-	-	1,265	112	-	-	-	64,307	32,837	-
Decontamination of Site Buildings																					
2b.1.3.1	Reactor	1,009	2,385	127	871	187	10,692	-	3,945	19,217	19,217	-	-	2,230	57,418	-	-	-	3,559,977	50,853	-
2b.1.3.2	Auxiliary	1,070	358	11	82	89	561	-	791	2,962	2,962	-	-	1,060	3,355	-	-	-	332,498	23,808	-
2b.1.3.3	Backwash Waste Receiving Tank	-	25	1	12	-	84	-	29	151	151	-	-	-	507	-	-	-	43,896	299	-
2b.1.3.4	Drum Transfer & Truck Loading Enclosure	15	7	0	2	2	12	-	13	51	51	-	-	19	74	-	-	-	7,118	368	-
2b.1.3.5	LLRW Storage Enclosure	102	46	1	12	3	84	-	86	334	334	-	-	38	502	-	-	-	44,971	2,424	-
2b.1.3.6	Radwaste	46	20	1	5	3	38	-	39	152	152	-	-	42	225	-	-	-	21,136	1,082	-
2b.1.3.7	Resin Disposal	13	10	0	2	7	12	-	14	58	58	-	-	83	69	-	-	-	9,271	383	-
2b.1.3	Totals	2,255	2,852	141	985	290	11,483	-	4,917	22,924	22,924	-	-	3,471	62,151	-	-	-	4,018,868	79,216	-
2b.1	Subtotal Period 2b Activity Costs	5,191	19,327	698	1,799	8,017	15,739	-	12,663	63,435	60,657	-	2,777	95,700	77,691	-	-	-	8,795,250	382,443	-
Period 2b Additional Costs																					
2b.2.1	Remedial Action Surveys	-	-	-	-	-	-	1,538	461	2,000	2,000	-	-	-	-	-	-	-	-	31,493	-
2b.2.2	Operational Equipment	-	-	9	31	302	-	-	51	391	391	-	-	5,855	-	-	-	-	146,375	16	-
2b.2	Subtotal Period 2b Additional Costs	-	-	9	31	302	-	1,538	512	2,391	2,391	-	-	5,855	-	-	-	-	146,375	31,509	-
Period 2b Collateral Costs																					
2b.3.1	Process decommissioning water waste	157	-	104	267	-	454	-	242	1,225	1,225	-	-	-	1,021	-	-	-	61,281	199	-
2b.3.2	Process decommissioning chemical flush waste	3	-	113	416	-	911	-	303	1,745	1,745	-	-	-	1,154	-	-	-	122,948	216	-
2b.3.3	Small tool allowance	-	351	-	-	-	-	-	53	404	404	-	-	-	-	-	-	-	-	-	-
2b.3.4	Spent Fuel Capital and Transfer	-	-	-	-	-	-	5,547	832	6,379	-	6,379	-	-	-	-	-	-	-	-	-
2b.3.5	On-site survey and release of 0.437 tons clean metallic waste	-	-	-	-	-	-	1	0	1	1	-	-	-	-	-	-	-	-	-	-
2b.3	Subtotal Period 2b Collateral Costs	160	351	217	683	-	1,365	5,548	1,430	9,754	3,374	6,379	-	-	2,175	-	-	-	184,229	415	-
Period 2b Period-Dependent Costs																					
2b.4.1	Decon supplies	894	-	-	-	-	-	-	224	1,118	1,118	-	-	-	-	-	-	-	-	-	-
2b.4.2	Insurance	-	-	-	-	-	-	758	76	833	833	-	-	-	-	-	-	-	-	-	-
2b.4.3	Property taxes	-	-	-	-	-	-	2,157	216	2,373	2,373	-	-	-	-	-	-	-	-	-	-
2b.4.4	Health physics supplies	-	2,630	-	-	-	-	-	658	3,288	3,288	-	-	-	-	-	-	-	-	-	-
2b.4.5	Heavy equipment rental	-	3,046	-	-	-	-	-	457	3,503	3,503	-	-	-	-	-	-	-	-	-	-
2b.4.6	Disposal of DAW generated	-	-	114	37	-	430	-	125	706	706	-	-	-	5,477	-	-	-	109,540	179	-
2b.4.7	Plant energy budget	-	-	-	-	-	-	3,512	527	4,039	4,039	-	-	-	-	-	-	-	-	-	-
2b.4.8	NRC Fees	-	-	-	-	-	-	660	66	726	726	-	-	-	-	-	-	-	-	-	-
2b.4.9	Emergency Planning Fees	-	-	-	-	-	-	1,799	180	1,979	-	1,979	-	-	-	-	-	-	-	-	-
2b.4.10	Fixed Overhead	-	-	-	-	-	-	1,857	279	2,136	2,136	-	-	-	-	-	-	-	-	-	-
2b.4.11	Spent Fuel Pool O&M	-	-	-	-	-	-	599	90	689	-	689	-	-	-	-	-	-	-	-	-
2b.4.12	Liquid Radwaste Processing Equipment/Services	-	-	-	-	-	-	304	46	349	349	-	-	-	-	-	-	-	-	-	-

Table F-2
Prairie Island DECON Unit 2
200 Years of Spent Fuel Storage and Periodic TN-40 Replacement Decommissioning Cost Estimate
(Thousands of 2014 Dollars)

Activity Index	Activity Description	Decon Cost	Removal Cost	Packaging Costs	Transport Costs	Off-Site Processing Costs	LLRW Disposal Costs	Other Costs	Total Contingency	Total Costs	NRC Lic. Term. Costs	Spent Fuel Management Costs	Site Restoration Costs	Processed Volume Cu. Feet	Burial Volumes				Burial / Processed Wt., Lbs.	Craft Manhours	Utility and Contractor Manhours
															Class A Cu. Feet	Class B Cu. Feet	Class C Cu. Feet	GTCC Cu. Feet			
Period 2b Period-Dependent Costs (continued)																					
2b.4.13	ISFSI Operating Costs	-	-	-	-	-	-	72	11	83	-	83	-	-	-	-	-	-	-	-	-
2b.4.14	Railroad Track Maintenance	-	-	-	-	-	-	81	12	93	-	-	93	-	-	-	-	-	-	-	-
2b.4.15	Security Staff Cost	-	-	-	-	-	-	6,910	1,037	7,947	7,947	-	-	-	-	-	-	-	-	-	199,870
2b.4.16	DOC Staff Cost	-	-	-	-	-	-	16,857	2,529	19,386	19,386	-	-	-	-	-	-	-	-	-	230,680
2b.4.17	Utility Staff Cost	-	-	-	-	-	-	22,809	3,421	26,230	26,230	-	-	-	-	-	-	-	-	-	428,180
2b.4	Subtotal Period 2b Period-Dependent Costs	894	5,676	114	37	-	430	58,375	9,950	75,477	72,632	2,751	93	-	5,477	-	-	-	109,540	179	858,730
2b.0	TOTAL PERIOD 2b COST	6,245	25,354	1,038	2,550	8,319	17,534	65,461	24,555	151,056	139,055	9,131	2,870	101,555	85,343	-	-	-	9,235,394	414,545	858,730
PERIOD 2c - Spent fuel delay prior to SFP decon																					
Period 2c Direct Decommissioning Activities																					
Period 2c Collateral Costs																					
2c.3.1	Spent Fuel Capital and Transfer	-	-	-	-	-	-	69,007	10,351	79,358	-	79,358	-	-	-	-	-	-	-	-	-
2c.3	Subtotal Period 2c Collateral Costs	-	-	-	-	-	-	69,007	10,351	79,358	-	79,358	-	-	-	-	-	-	-	-	-
Period 2c Period-Dependent Costs																					
2c.4.1	Insurance	-	-	-	-	-	-	5,381	538	5,919	5,919	-	-	-	-	-	-	-	-	-	-
2c.4.2	Property taxes	-	-	-	-	-	-	11,530	1,153	12,684	12,684	-	-	-	-	-	-	-	-	-	-
2c.4.3	Health physics supplies	-	2,115	-	-	-	-	-	529	2,644	2,644	-	-	-	-	-	-	-	-	-	-
2c.4.4	Disposal of DAW generated	-	-	92	30	-	349	-	101	572	572	-	-	-	4,440	-	-	-	88,800	145	-
2c.4.5	Plant energy budget	-	-	-	-	-	-	6,652	998	7,650	7,650	-	-	-	-	-	-	-	-	-	-
2c.4.6	NRC Fees	-	-	-	-	-	-	2,860	286	3,146	3,146	-	-	-	-	-	-	-	-	-	-
2c.4.7	Emergency Planning Fees	-	-	-	-	-	-	12,779	1,278	14,057	-	14,057	-	-	-	-	-	-	-	-	-
2c.4.8	Fixed Overhead	-	-	-	-	-	-	13,191	1,979	15,169	15,169	-	-	-	-	-	-	-	-	-	-
2c.4.9	Spent Fuel Pool O&M	-	-	-	-	-	-	4,257	638	4,895	-	4,895	-	-	-	-	-	-	-	-	-
2c.4.10	Liquid Radwaste Processing Equipment/Services	-	-	-	-	-	-	216	32	248	248	-	-	-	-	-	-	-	-	-	-
2c.4.11	ISFSI Operating Costs	-	-	-	-	-	-	514	77	591	-	591	-	-	-	-	-	-	-	-	-
2c.4.12	Railroad Track Maintenance	-	-	-	-	-	-	574	86	660	-	-	660	-	-	-	-	-	-	-	-
2c.4.13	Security Staff Cost	-	-	-	-	-	-	41,864	6,280	48,144	24,072	24,072	-	-	-	-	-	-	-	-	1,195,234
2c.4.14	Utility Staff Cost	-	-	-	-	-	-	46,311	6,947	53,258	26,629	26,629	-	-	-	-	-	-	-	-	886,606
2c.4	Subtotal Period 2c Period-Dependent Costs	-	2,115	92	30	-	349	146,129	20,922	169,638	98,734	70,244	660	-	4,440	-	-	-	88,800	145	2,081,840
2c.0	TOTAL PERIOD 2c COST	-	2,115	92	30	-	349	215,136	31,273	248,995	98,734	149,602	660	-	4,440	-	-	-	88,800	145	2,081,840
PERIOD 2d - Decontamination Following Wet Fuel Storage																					
Period 2d Direct Decommissioning Activities																					
2d.1.1	Remove spent fuel racks	287	29	90	32	-	574	-	308	1,320	1,320	-	-	-	2,092	-	-	-	138,298	576	-
Disposal of Plant Systems																					
2d.1.2.1	Electrical - Contaminated - Fuel Pool	-	163	2	6	72	9	-	55	307	307	-	-	864	33	-	-	-	37,250	2,783	-
2d.1.2.2	Electrical - Decontaminated - Fuel Pool	-	1,001	13	50	675	-	-	360	2,099	2,099	-	-	8,069	-	-	-	-	327,668	16,495	-
2d.1.2.3	Fire Protection & Detection - RCA Fuel P	-	30	0	2	24	-	-	11	67	67	-	-	286	-	-	-	-	11,622	476	-
2d.1.2.4	HVAC - Contaminated - Fuel Pool	-	466	11	33	404	50	-	196	1,159	1,159	-	-	4,828	182	-	-	-	208,080	7,448	-
2d.1.2.5	Safeguards Chilled Water - RCA	-	4	0	0	2	-	-	1	7	7	-	-	26	-	-	-	-	1,045	51	-
2d.1.2.6	Spent Fuel Pool Cooling	27	29	3	2	3	29	-	29	122	122	-	-	39	107	-	-	-	8,635	882	-
2d.1.2.7	Spent Fuel Pool Normal Ventilation	-	22	1	2	22	3	-	10	60	60	-	-	265	12	-	-	-	11,532	394	-
2d.1.2	Totals	27	1,715	29	94	1,203	91	-	662	3,822	3,822	-	-	14,376	333	-	-	-	605,832	28,530	-
Decontamination of Site Buildings																					
2d.1.3.1	Fuel Handling of Aux Building	860	941	9	34	202	167	-	743	2,956	2,956	-	-	2,417	944	-	-	-	177,818	30,401	-
2d.1.3	Totals	860	941	9	34	202	167	-	743	2,956	2,956	-	-	2,417	944	-	-	-	177,818	30,401	-
2d.1.4	Scaffolding in support of decommissioning	-	626	6	2	23	6	-	162	826	826	-	-	253	22	-	-	-	12,861	6,567	-
2d.1	Subtotal Period 2d Activity Costs	1,174	3,311	134	163	1,428	838	-	1,876	8,923	8,923	-	-	17,046	3,391	-	-	-	934,809	66,074	-
Period 2d Additional Costs																					
2d.2.1	License Termination Survey Planning	-	-	-	-	-	-	547	164	711	711	-	-	-	-	-	-	-	-	-	6,240
2d.2.2	Remedial Action Surveys	-	-	-	-	-	-	793	238	1,031	1,031	-	-	-	-	-	-	-	-	16,230	-
2d.2	Subtotal Period 2d Additional Costs	-	-	-	-	-	-	1,339	402	1,741	1,741	-	-	-	-	-	-	-	-	16,230	6,240

*Prairie Island Nuclear Nuclear Generating Plant
Decommissioning Cost Analysis*

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Table F-2
Prairie Island DECON Unit 2
200 Years of Spent Fuel Storage and Periodic TN-40 Replacement Decommissioning Cost Estimate
(Thousands of 2014 Dollars)

Activity Index	Activity Description	Decon Cost	Removal Cost	Packaging Costs	Transport Costs	Off-Site Processing Costs	LLRW Disposal Costs	Other Costs	Total Contingency	Total Costs	NRC Lic. Term. Costs	Spent Fuel Management Costs	Site Restoration Costs	Processed Volume Cu. Feet	Burial Volumes				Burial / Processed Wt., Lbs.	Craft Manhours	Utility and Contractor Manhours
															Class A Cu. Feet	Class B Cu. Feet	Class C Cu. Feet	GTCC Cu. Feet			
Period 2d Collateral Costs																					
2d.3.1	Process decommissioning water waste	15	-	12	30	-	52	-	26	135	135	-	-	-	117	-	-	-	6,990	23	-
2d.3.2	Process decommissioning chemical flush waste	0	-	1	5	-	11	-	4	20	20	-	-	-	13	-	-	-	1,422	2	-
2d.3.3	Small tool allowance	-	67	-	-	-	-	-	10	77	77	-	-	-	-	-	-	-	-	-	-
2d.3.4	Decommissioning Equipment Disposition	-	-	137	59	556	145	-	142	1,039	1,039	-	-	6,000	529	-	-	-	304,968	88	-
2d.3.5	Spent Fuel Capital and Transfer	-	-	-	-	-	-	3,528	529	4,057	-	4,057	-	-	-	-	-	-	-	-	-
2d.3	Subtotal Period 2d Collateral Costs	15	67	150	94	556	207	3,528	711	5,328	1,271	4,057	-	6,000	659	-	-	-	313,381	113	-
Period 2d Period-Dependent Costs																					
2d.4.1	Decon supplies	168	-	-	-	-	-	-	42	211	211	-	-	-	-	-	-	-	-	-	-
2d.4.2	Insurance	-	-	-	-	-	-	390	39	429	429	-	-	-	-	-	-	-	-	-	-
2d.4.3	Property taxes	-	-	-	-	-	-	579	58	637	637	-	-	-	-	-	-	-	-	-	-
2d.4.4	Health physics supplies	-	707	-	-	-	-	-	177	884	884	-	-	-	-	-	-	-	-	-	-
2d.4.5	Heavy equipment rental	-	1,570	-	-	-	-	-	235	1,805	1,805	-	-	-	-	-	-	-	-	-	-
2d.4.6	Disposal of DAW generated	-	-	42	14	-	157	-	46	258	258	-	-	-	2,002	-	-	-	40,031	65	-
2d.4.7	Plant energy budget	-	-	-	-	-	-	965	145	1,110	1,110	-	-	-	-	-	-	-	-	-	-
2d.4.8	NRC Fees	-	-	-	-	-	-	285	29	314	314	-	-	-	-	-	-	-	-	-	-
2d.4.9	Emergency Planning Fees	-	-	-	-	-	-	927	93	1,020	-	1,020	-	-	-	-	-	-	-	-	-
2d.4.10	Fixed Overhead	-	-	-	-	-	-	957	144	1,101	1,101	-	-	-	-	-	-	-	-	-	-
2d.4.11	Liquid Radwaste Processing Equipment/Services	-	-	-	-	-	-	313	47	360	360	-	-	-	-	-	-	-	-	-	-
2d.4.12	ISFSI Operating Costs	-	-	-	-	-	-	37	6	43	-	43	-	-	-	-	-	-	-	-	-
2d.4.13	Railroad Track Maintenance	-	-	-	-	-	-	42	6	48	-	-	48	-	-	-	-	-	-	-	-
2d.4.14	Security Staff Cost	-	-	-	-	-	-	1,074	161	1,235	1,235	-	-	-	-	-	-	-	-	-	29,526
2d.4.15	DOC Staff Cost	-	-	-	-	-	-	5,091	764	5,855	5,855	-	-	-	-	-	-	-	-	-	70,436
2d.4.16	Utility Staff Cost	-	-	-	-	-	-	6,818	1,023	7,841	7,841	-	-	-	-	-	-	-	-	-	127,029
2d.4	Subtotal Period 2d Period-Dependent Costs	168	2,277	42	14	-	157	17,480	3,013	23,150	22,039	1,063	48	-	2,002	-	-	-	40,031	65	226,990
2d.0	TOTAL PERIOD 2d COST	1,357	5,654	325	270	1,985	1,203	22,347	6,001	39,142	33,974	5,120	48	23,046	6,052	-	-	-	1,288,221	82,483	233,230
PERIOD 2f - License Termination																					
Period 2f Direct Decommissioning Activities																					
2f.1.1	ORISE confirmatory survey	-	-	-	-	-	-	163	49	212	212	-	-	-	-	-	-	-	-	-	-
2f.1.2	Terminate license	-	-	-	-	-	-	-	-	a	-	-	-	-	-	-	-	-	-	-	-
2f.1	Subtotal Period 2f Activity Costs	-	-	-	-	-	-	163	49	212	212	-	-	-	-	-	-	-	-	-	-
Period 2f Additional Costs																					
2f.2.1	License Termination Survey	-	-	-	-	-	-	5,826	1,748	7,573	7,573	-	-	-	-	-	-	-	-	102,642	3,120
2f.2	Subtotal Period 2f Additional Costs	-	-	-	-	-	-	5,826	1,748	7,573	7,573	-	-	-	-	-	-	-	-	102,642	3,120
Period 2f Collateral Costs																					
2f.3.1	DOC staff relocation expenses	-	-	-	-	-	-	1,708	256	1,964	1,964	-	-	-	-	-	-	-	-	-	-
2f.3.2	Spent Fuel Capital and Transfer	-	-	-	-	-	-	2,299	345	2,643	-	2,643	-	-	-	-	-	-	-	-	-
2f.3	Subtotal Period 2f Collateral Costs	-	-	-	-	-	-	4,006	601	4,607	1,964	2,643	-	-	-	-	-	-	-	-	-
Period 2f Period-Dependent Costs																					
2f.4.1	Insurance	-	-	-	-	-	-	344	34	379	379	-	-	-	-	-	-	-	-	-	-
2f.4.2	Property taxes	-	-	-	-	-	-	526	53	578	578	-	-	-	-	-	-	-	-	-	-
2f.4.3	Health physics supplies	-	572	-	-	-	-	-	143	715	715	-	-	-	-	-	-	-	-	-	-
2f.4.4	Disposal of DAW generated	-	-	7	2	-	26	-	8	43	43	-	-	-	334	-	-	-	6,685	11	-
2f.4.5	Plant energy budget	-	-	-	-	-	-	462	69	532	532	-	-	-	-	-	-	-	-	-	-
2f.4.6	NRC Fees	-	-	-	-	-	-	300	30	330	330	-	-	-	-	-	-	-	-	-	-
2f.4.7	Emergency Planning Fees	-	-	-	-	-	-	47	5	52	-	52	-	-	-	-	-	-	-	-	-
2f.4.8	Fixed Overhead	-	-	-	-	-	-	917	138	1,054	1,054	-	-	-	-	-	-	-	-	-	-
2f.4.9	ISFSI Operating Costs	-	-	-	-	-	-	36	5	41	-	41	-	-	-	-	-	-	-	-	-
2f.4.10	Railroad Track Maintenance	-	-	-	-	-	-	40	6	46	-	-	46	-	-	-	-	-	-	-	-
2f.4.11	Security Staff Cost	-	-	-	-	-	-	1,010	151	1,161	1,161	-	-	-	-	-	-	-	-	-	27,690
2f.4.12	DOC Staff Cost	-	-	-	-	-	-	3,451	518	3,969	3,969	-	-	-	-	-	-	-	-	-	46,410
2f.4.13	Utility Staff Cost	-	-	-	-	-	-	3,345	502	3,847	3,847	-	-	-	-	-	-	-	-	-	59,670
2f.4	Subtotal Period 2f Period-Dependent Costs	-	572	7	2	-	26	10,478	1,661	12,747	12,608	93	46	-	334	-	-	-	6,685	11	133,770
2f.0	TOTAL PERIOD 2f COST	-	572	7	2	-	26	20,473	4,059	25,139	22,357	2,737	46	-	334	-	-	-	6,685	102,653	136,890
PERIOD 2 TOTALS		8,469	57,971	25,318	6,802	13,306	35,308	383,275	97,170	627,619	442,158	178,945	6,517	163,227	131,421	125	617	-	14,923,200	834,160	4,036,861

Prairie Island Nuclear Nuclear Generating Plant
Decommissioning Cost Analysis

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Table F-2
Prairie Island DECON Unit 2
200 Years of Spent Fuel Storage and Periodic TN-40 Replacement Decommissioning Cost Estimate
(Thousands of 2014 Dollars)

Activity Index	Activity Description	Decon Cost	Removal Cost	Packaging Costs	Transport Costs	Off-Site Processing Costs	LLRW Disposal Costs	Other Costs	Total Contingency	Total Costs	NRC Lic. Term. Costs	Spent Fuel Management Costs	Site Restoration Costs	Processed Volume Cu. Feet	Burial Volumes				Burial / Processed Wt., Lbs.	Craft Manhours	Utility and Contractor Manhours
															Class A Cu. Feet	Class B Cu. Feet	Class C Cu. Feet	GTCC Cu. Feet			
Period 3c Collateral Costs																					
3c.3.1	Spent Fuel Capital and Transfer	-	-	-	-	-	-	810,724	121,609	932,333	-	932,333	-	-	-	-	-	-	-	-	-
3c.3	Subtotal Period 3c Collateral Costs	-	-	-	-	-	-	810,724	121,609	932,333	-	932,333	-	-	-	-	-	-	-	-	-
Period 3c Period-Dependent Costs																					
3c.4.1	Insurance	-	-	-	-	-	-	31,681	3,168	34,849	-	34,849	-	-	-	-	-	-	-	-	-
3c.4.2	Property taxes	-	-	-	-	-	-	76,923	7,692	84,615	-	84,615	-	-	-	-	-	-	-	-	-
3c.4.3	Plant energy budget	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
3c.4.4	NRC ISFSI Fees	-	-	-	-	-	-	24,995	2,499	27,494	-	27,494	-	-	-	-	-	-	-	-	-
3c.4.5	Emergency Planning Fees	-	-	-	-	-	-	8,703	870	9,573	-	9,573	-	-	-	-	-	-	-	-	-
3c.4.6	Fixed Overhead	-	-	-	-	-	-	74,068	11,110	85,178	-	85,178	-	-	-	-	-	-	-	-	-
3c.4.7	ISFSI Operating Costs	-	-	-	-	-	-	6,570	986	7,556	-	7,556	-	-	-	-	-	-	-	-	-
3c.4.8	Railroad Track Maintenance	-	-	-	-	-	-	7,340	1,101	8,441	-	8,441	-	-	-	-	-	-	-	-	-
3c.4.9	Security Staff Cost	-	-	-	-	-	-	146,509	21,976	168,486	-	168,486	-	-	-	-	-	-	-	-	3,874,963
3c.4.10	DOC Staff Cost	-	-	-	-	-	-	13,713	2,057	15,770	-	15,770	-	-	-	-	-	-	-	-	143,517
3c.4.11	Utility Staff Cost	-	-	-	-	-	-	96,594	14,489	111,083	-	111,083	-	-	-	-	-	-	-	-	1,903,037
3c.4	Subtotal Period 3c Period-Dependent Costs	-	-	-	-	-	-	487,097	65,949	553,046	-	553,046	-	-	-	-	-	-	-	-	5,921,517
3c.0	TOTAL PERIOD 3c COST	-	-	-	6,407	-	53,424	1,297,821	201,875	1,559,527	-	1,559,527	-	-	175,294	-	-	-	27,783,000	-	5,921,517
PERIOD 3d - GTCC shipping																					
Period 3d Direct Decommissioning Activities																					
Nuclear Steam Supply System Removal																					
3d.1.1.1	Vessel & Internals GTCC Disposal	-	-	877	-	-	7,480	-	1,341	9,698	9,698	-	-	-	-	-	-	2,810	641,697	-	-
3d.1.1	Totals	-	-	877	-	-	7,480	-	1,341	9,698	9,698	-	-	-	-	-	-	2,810	641,697	-	-
3d.1	Subtotal Period 3d Activity Costs	-	-	877	-	-	7,480	-	1,341	9,698	9,698	-	-	-	-	-	-	2,810	641,697	-	-
Period 3d Collateral Costs																					
3d.3.1	Spent Fuel Capital and Transfer	-	-	-	-	-	-	82,249	12,337	94,587	-	94,587	-	-	-	-	-	-	-	-	-
3d.3	Subtotal Period 3d Collateral Costs	-	-	-	-	-	-	82,249	12,337	94,587	-	94,587	-	-	-	-	-	-	-	-	-
Period 3d Period-Dependent Costs																					
3d.4.1	Insurance	-	-	-	-	-	-	6,219	622	6,841	-	6,841	-	-	-	-	-	-	-	-	-
3d.4.2	Property taxes	-	-	-	-	-	-	15,102	1,510	16,612	-	16,612	-	-	-	-	-	-	-	-	-
3d.4.3	Plant energy budget	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
3d.4.4	NRC ISFSI Fees	-	-	-	-	-	-	4,907	491	5,398	-	5,398	-	-	-	-	-	-	-	-	-
3d.4.5	Emergency Planning Fees	-	-	-	-	-	-	1,709	171	1,879	-	1,879	-	-	-	-	-	-	-	-	-
3d.4.6	Fixed Overhead	-	-	-	-	-	-	14,541	2,181	16,722	-	16,722	-	-	-	-	-	-	-	-	-
3d.4.7	ISFSI Operating Costs	-	-	-	-	-	-	1,290	193	1,483	-	1,483	-	-	-	-	-	-	-	-	-
3d.4.8	Railroad Track Maintenance	-	-	-	-	-	-	1,639	246	1,885	-	1,885	-	-	-	-	-	-	-	-	-
3d.4.9	Security Staff Cost	-	-	-	-	-	-	28,762	4,314	33,076	-	33,076	-	-	-	-	-	-	-	-	760,706
3d.4.10	Utility Staff Cost	-	-	-	-	-	-	10,039	1,506	11,544	-	11,544	-	-	-	-	-	-	-	-	190,458
3d.4	Subtotal Period 3d Period-Dependent Costs	-	-	-	-	-	-	84,206	11,234	95,441	-	95,441	-	-	-	-	-	-	-	-	951,164
3d.0	TOTAL PERIOD 3d COST	-	-	877	-	-	7,480	166,456	24,913	199,726	9,698	190,027	-	-	-	-	-	2,810	641,697	-	951,164
PERIOD 3e - ISFSI Decontamination																					
Period 3e Direct Decommissioning Activities																					
Period 3e Additional Costs																					
3e.2.1	Decommissioning of ISFSI	14	1	3	2	-	18	629	167	834	834	-	-	-	125	-	-	-	8,916	3,452	828
3e.2	Subtotal Period 3e Additional Costs	14	1	3	2	-	18	629	167	834	834	-	-	-	125	-	-	-	8,916	3,452	828
Period 3e Collateral Costs																					
3e.3	Subtotal Period 3e Collateral Costs	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-

Prairie Island Nuclear Nuclear Generating Plant
Decommissioning Cost Analysis

Table F-2
Prairie Island DECON Unit 2
200 Years of Spent Fuel Storage and Periodic TN-40 Replacement Decommissioning Cost Estimate
(Thousands of 2014 Dollars)

Activity Index	Activity Description	Decon Cost	Removal Cost	Packaging Costs	Transport Costs	Off-Site Processing Costs	LLRW Disposal Costs	Other Costs	Total Contingency	Total Costs	NRC Lic. Term. Costs	Spent Fuel Management Costs	Site Restoration Costs	Processed Volume Cu. Feet	Burial Volumes				Burial / Processed Wt., Lbs.	Craft Manhours	Utility and Contractor Manhours
															Class A Cu. Feet	Class B Cu. Feet	Class C Cu. Feet	GTCC Cu. Feet			
Period 3e Period-Dependent Costs																					
3e.4.1	Insurance	-	-	-	-	-	-	84	21	104	104	-	-	-	-	-	-	-	-	-	-
3e.4.2	Property taxes	-	-	-	-	-	-	185	46	232	232	-	-	-	-	-	-	-	-	-	-
3e.4.3	Plant energy budget	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
3e.4.4	Fixed Overhead	-	-	-	-	-	-	178	45	223	223	-	-	-	-	-	-	-	-	-	-
3e.4.5	Railroad Track Maintenance	-	-	-	-	-	-	18	4	22	-	-	22	-	-	-	-	-	-	-	-
3e.4.6	Security Staff Cost	-	-	-	-	-	-	65	16	81	81	-	-	-	-	-	-	-	-	-	2,510
3e.4.7	Utility Staff Cost	-	-	-	-	-	-	103	26	129	129	-	-	-	-	-	-	-	-	-	1,901
3e.4	Subtotal Period 3e Period-Dependent Costs	-	-	-	-	-	-	633	158	791	769	-	22	-	-	-	-	-	-	-	4,411
3e.0	TOTAL PERIOD 3e COST	14	1	3	2	-	18	1,262	325	1,625	1,603	-	22	-	125	-	-	-	8,916	3,452	5,239
PERIOD 3f - ISFSI Site Restoration																					
Period 3f Direct Decommissioning Activities																					
Period 3f Additional Costs																					
3f.2.1	Demolition and Site Restoration of ISFSI	-	411	-	-	-	-	28	66	504	-	-	504	-	-	-	-	-	-	2,986	80
3f.2	Subtotal Period 3f Additional Costs	-	411	-	-	-	-	28	66	504	-	-	504	-	-	-	-	-	-	2,986	80
Period 3f Collateral Costs																					
3f.3.1	Small tool allowance	-	4	-	-	-	-	-	1	4	-	-	4	-	-	-	-	-	-	-	-
3f.3	Subtotal Period 3f Collateral Costs	-	4	-	-	-	-	-	1	4	-	-	4	-	-	-	-	-	-	-	-
Period 3f Period-Dependent Costs																					
3f.4.1	Insurance	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
3f.4.2	Property taxes	-	-	-	-	-	-	93	9	103	-	-	103	-	-	-	-	-	-	-	-
3f.4.3	Plant energy budget	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
3f.4.4	Fixed Overhead	-	-	-	-	-	-	90	13	103	-	-	103	-	-	-	-	-	-	-	-
3f.4.5	Railroad Track Maintenance	-	-	-	-	-	-	9	1	10	-	-	10	-	-	-	-	-	-	-	-
3f.4.6	Security Staff Cost	-	-	-	-	-	-	33	5	38	-	-	38	-	-	-	-	-	-	-	1,265
3f.4.7	Utility Staff Cost	-	-	-	-	-	-	41	6	47	-	-	47	-	-	-	-	-	-	-	784
3f.4	Subtotal Period 3f Period-Dependent Costs	-	-	-	-	-	-	266	35	301	-	-	301	-	-	-	-	-	-	-	2,050
3f.0	TOTAL PERIOD 3f COST	-	415	-	-	-	-	293	101	809	-	-	809	-	-	-	-	-	-	2,986	2,130
PERIOD 3 TOTALS		14	27,164	880	6,409	-	60,923	1,505,778	237,103	1,838,270	11,389	1,777,455	49,426	-	175,419	-	-	2,810	28,433,610	221,569	7,149,450
TOTAL COST TO DECOMMISSION		11,423	90,207	26,580	13,622	13,462	101,210	1,983,144	351,295	2,590,944	552,172	1,982,135	56,636	169,551	320,726	713	617	2,810	43,976,330	1,089,269	12,040,560

TOTAL COST TO DECOMMISSION WITH 15.69% CONTINGENCY:	\$2,590,944	thousands of 2014	dollars
TOTAL NRC LICENSE TERMINATION COST IS 21.31% OR:	\$552,172	thousands of 2014	dollars
SPENT FUEL MANAGEMENT COST IS 76.5% OR:	\$1,982,135	thousands of 2014	dollars
NON-NUCLEAR DEMOLITION COST IS 2.19% OR:	\$56,636	thousands of 2014	dollars
TOTAL RADWASTE VOLUME BURIED (EXCLUDING GTCC):	322,057	Cubic Feet	
TOTAL GREATER THAN CLASS C RADWASTE VOLUME GENERATED:	2,810	Cubic Feet	
TOTAL SCRAP METAL REMOVED:	34,906	Tons	
TOTAL CRAFT LABOR REQUIREMENTS:	1,089,269	Man-hours	

End Notes:
n/a - indicates that this activity not charged as decommissioning expense.
a - indicates that this activity performed by decommissioning staff.
0 - indicates that this value is less than 0.5 but is non-zero.
a cell containing " - " indicates a zero value

APPENDIX G

DETAILED COST ANALYSIS

ISFSI

Table G
Prairie Island Nuclear Generating Plant
ISFSI Decommissioning Cost Estimate
(thousands of 2014 dollars)

Activity Description	Removal Costs	Packaging Costs	Transport Costs	LLRW Disposal Costs	Other Costs	Total Costs	Burial Volume Class A (cubic feet)	Craft Manhours	Oversight and Contractor Manhours
Decommissioning Contractor									
Planning (characterization, specs and procedures)					130.2	130.2			880
Decontamination		1.3	0.4	4.7		6.4	60		
License Termination (radiological surveys)					603.5	603.5		5,100	
Subtotal		1.3	0.4	4.7	733.7	740.1	60	5,100	880
Supporting Costs									
NRC and NRC Contractor Fees and Costs					383.7	383.7			776
Insurance					167.1	167.1			
Property taxes					370.8	370.8			
Plant energy budget					-	-			
Fixed Overhead					356.8	356.8			
Railroad Track Maintenance					35.4	35.4			
Security Staff Cost					129.4	129.4			2,510
Oversight Staff Cost					206.4	206.4			1,901
Subtotal					1,649.6	1,649.6			5,187
Total (w/o contingency)		1.3	0.4	4.7	2,383.3	2,389.7	60.0	5,100.0	6,067.3
Total (w/25% contingency)		1.6	0.5	5.9	2,979.1	2,987.1			

The application of contingency (25%) is consistent with the evaluation criteria referenced by the NRC in NUREG-1757 ("Consolidated Decommissioning Guidance, Financial Assurance, Recordkeeping, and Timeliness," U.S. NRC's Office of Nuclear Material Safety and Safeguards, NUREG-1757, Vol. 3, Rev. 1, February 2012)