STATE OF NORTH CAROLINA
UTILITIES COMMISSION
RALEIGH

DOCKET NO. E-2, SUB 1321

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

In the Matter of Application of Duke Energy Progress, LLC Pursuant to G.S. 62-133.2 and NCUC Rule R8-55 Relating to Fuel and Fuel-Related Charge Adjustments for Electric Utilities	)))))	**DIRECT TESTIMONY OF MATTHEW L. CAMERON FOR DUKE ENERGY PROGRESS, LLC**

Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.

A. My name is Matthew L. Cameron and my business address is 526 South Church Street, Charlotte, North Carolina.

Q. BY WHOM ARE YOU EMPLOYED AND IN WHAT CAPACITY?

A. I am the Manager of Nuclear Fuel Supply for Duke Energy Carolinas, LLC ("DEC" or the "Company") and Duke Energy Progress, LLC ("DEP").

Q. WHAT ARE YOUR PRESENT RESPONSIBILITIES AT DEP?

A. I am responsible for nuclear fuel procurement for the nuclear units owned and operated by DEC and DEP.

Q. PLEASE SUMMARIZE YOUR EDUCATIONAL BACKGROUND AND PROFESSIONAL EXPERIENCE.

A. I graduated from Purdue University with a Bachelor of Science degree in Nuclear Engineering, and from Wake Forest University with a Master's degree in Business Administration. I began my career with the Company in 2006 as an engineer and worked in Duke Energy's safety analysis group where I performed plant response and accident analysis. I assumed the lead for purchasing uranium and conversion services in 2012 and took over responsibility for purchasing uranium, conversion services, enrichment services, and fuel fabrication in 2022.

I became a registered professional engineer in the state of North Carolina in 2010.

Q. HAVE YOU FILED TESTIMONY OR TESTIFIED BEFORE THIS COMMISSION IN ANY PRIOR PROCEEDING?

A. Yes. I filed testimony in the DEC fuel and fuel-related cost recovery proceedings in Docket E-2, Sub 1292.

Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY IN THIS PROCEEDING?

A. The purpose of my testimony is to (1) provide information regarding DEP's nuclear fuel purchasing practices, (2) provide costs for the April 1, 2022 through March 31, 2023 test period ("test period"), and (3) describe changes forthcoming for the December 1, 2023 through November 30, 2024 billing period ("billing period").

Q. YOUR TESTIMONY INCLUDES TWO EXHIBITS. WERE THESE EXHIBITS PREPARED BY YOU OR AT YOUR DIRECTION AND UNDER YOUR SUPERVISION?

A. Yes. These exhibits were prepared at my direction and under my supervision, and consist of Cameron Exhibit 1, which is a Graphical Representation of the Nuclear Fuel Cycle, and Cameron Exhibit 2, which sets forth the Company's Nuclear Fuel Procurement Practices.

Q. PLEASE DESCRIBE THE COMPONENTS THAT MAKE UP NUCLEAR FUEL.

A. In order to prepare uranium for use in a nuclear reactor, it must be processed from an ore to a ceramic fuel pellet. This process is commonly broken into four distinct industrial stages: (1) mining and milling; (2) conversion; (3) enrichment; and (4) fabrication. This process is illustrated graphically in Cameron Exhibit 1.

Uranium is often mined by either surface (*i.e.*, open cut) or underground mining techniques, depending on the depth of the ore deposit. The ore is then sent to a mill where it is crushed and ground-up before the uranium is extracted by leaching, the process in which either a strong acid or alkaline solution is used to dissolve the uranium. Once dried, the uranium oxide ("U_3O_8") concentrate – often referred to as yellowcake – is packed in drums for transport to a conversion facility. Alternatively, uranium may be mined by in situ leach ("ISL") in which oxygenated groundwater is circulated through a very porous ore body to dissolve the uranium and bring it to the surface. ISL may also use slightly acidic or alkaline solutions to keep the uranium in solution. The uranium is then recovered from the solution in a mill to produce U_3O_8.

After milling, the U_3O_8 must be chemically converted into uranium hexafluoride ("UF_6"). This intermediate stage is known as conversion and produces the feedstock required in the isotopic separation process.

Naturally occurring uranium primarily consists of two isotopes, 0.7% Uranium-235 ("U-235") and 99.3% Uranium-238. Most of this country's nuclear reactors (including those of the Company) require U-235 concentrations in the 3-5% range to operate a complete cycle of 18 to 24 months between refueling outages. The process of increasing the concentration of U-235 is known as enrichment. Gas centrifuge is the primary technology used by the commercial enrichment suppliers. This process first applies heat to the UF_6 to create a gas. Then, using the mass differences between the uranium isotopes, the natural uranium is separated into two gas streams, one being enriched to the desired level

of U-235, known as low enriched uranium, and the other being depleted in U-235, known as tails.

Once the UF_6 is enriched to the desired level, it is converted to uranium dioxide powder and formed into pellets. This process and subsequent steps of inserting the fuel pellets into fuel rods and bundling the rods into fuel assemblies for use in nuclear reactors is referred to as fabrication.

Q. PLEASE PROVIDE A SUMMARY OF DEP'S NUCLEAR FUEL PROCUREMENT PRACTICES.

A. As set forth in Cameron Exhibit 2, DEP's nuclear fuel procurement practices involve computing near and long-term consumption forecasts, establishing nuclear system inventory levels, projecting required annual fuel purchases, requesting proposals from qualified suppliers, negotiating a portfolio of long-term contracts from diverse sources of supply, and monitoring deliveries against contract commitments.

For uranium concentrates, conversion, and enrichment services, long-term contracts are used extensively in the industry to cover forward requirements and ensure security of supply. Throughout the industry, the initial delivery under new long-term contracts commonly occurs several years after contract execution. DEP relies extensively on long-term contracts to cover the largest portion of its forward requirements. By staggering long-term contracts over time for these components of the nuclear fuel cycle, DEP's purchases within a given year consist of a blend of contract prices negotiated at many different periods in the markets, which has the effect of smoothing out DEP's exposure to price volatility.

Diversifying fuel suppliers reduces DEP's exposure to possible disruptions from any single source of supply. Due to the technical complexities of changing fabrication services suppliers, DEP generally sources these services to a single domestic supplier on a plant-by-plant basis using multi-year contracts.

Q. PLEASE DESCRIBE DEP'S DELIVERED COST OF NUCLEAR FUEL DURING THE TEST PERIOD.

A. Staggering long-term contracts over time for each of the components of the nuclear fuel cycle means DEP's purchases within a given year consist of a blend of contract prices negotiated at many different periods in the markets. DEP mitigates the impact of market volatility on the portfolio of supply contracts by using a mixture of pricing mechanisms. Consistent with its portfolio approach to contracting, DEP entered into several long-term contracts during the test period.

DEP's portfolio of diversified contract pricing yielded an average unit cost of $43.05 per pound for uranium concentrates during the test period, representing less than 7% increase from the prior test period.

A majority of DEP's enrichment purchases during the test period were delivered under long-term contracts negotiated prior to the test period. The staggered portfolio approach has the effect of smoothing out DEP's exposure to price volatility. The average unit cost of DEP's purchases of enrichment services during the test period decreased 47% to $76.73 per Separative Work Unit.

Delivered costs for fabrication and conversion services have a limited impact on the overall fuel expense rate given that the dollar amounts for these purchases represent a substantially smaller percentage – 20% and 7%,

respectively, for the fuel batches recently loaded into DEP's reactors – of DEP's total direct fuel cost relative to uranium concentrates or enrichment, which are 45% and 28%, respectively.

Q. PLEASE DESCRIBE THE LATEST TRENDS IN NUCLEAR FUEL MARKET CONDITIONS.

A. Prices in the uranium concentrate markets have increased due to production cutbacks and activity from financial investors. Industry consultants believe that recent production cutbacks have been warranted due to the previously existing oversupply conditions and that market prices need to further increase in the longer term to provide the economic incentive for the exploration, mine construction, and production necessary to support future industry uranium requirements.

Market prices for conversion and enrichment services continue to increase primarily due to the potential for production gaps as a result of the Russian invasion of Ukraine.

Fabrication is not a service for which prices are published; however, industry consultants expect fabrication prices will continue to generally trend upward.

Q. WHAT CHANGES DO YOU SEE IN DEP'S NUCLEAR FUEL COST IN THE BILLING PERIOD?

A. Because fuel is typically expensed over two to three operating cycles (roughly three to six years), DEP's nuclear fuel expense in the upcoming billing period will be determined by the cost of fuel assemblies loaded into the reactors during the test period, as well as prior periods. The fuel residing in the reactors during the

billing period will have been obtained under historical contracts negotiated in various market conditions. Each of these contracts contributes to a portion of the uranium, conversion, enrichment, and fabrication costs reflected in the total fuel expense.

The average fuel expense is expected to remain relatively flat, from 0.6122 cents per kWh incurred in the test period, to approximately 0.6113 cents per kWh in the billing period.

Q. WHAT STEPS IS DEP TAKING TO PROVIDE STABILITY IN ITS NUCLEAR FUEL COSTS AND TO MITIGATE PRICE INCREASES IN THE VARIOUS COMPONENTS OF NUCLEAR FUEL?

A. As I discussed earlier and as described in Cameron Exhibit 2, for uranium concentrates, conversion, and enrichment services, DEP relies extensively on staggered long-term contracts to cover the largest portion of its forward requirements. By staggering long-term contracts over time and incorporating a range of pricing mechanisms, DEP's purchases within a given year consist of a blend of contract prices negotiated at many different periods in the markets, which has the effect of smoothing out DEP's exposure to price volatility.

Although costs of certain components of nuclear fuel are expected to increase in future years, nuclear fuel costs on a cents per kWh basis will likely continue to be a fraction of the cents per kWh cost of fossil fuel. Therefore, customers will continue to benefit from DEP's diverse generation mix and the strong performance of its nuclear fleet through lower fuel costs than would

otherwise result absent the significant contribution of nuclear generation to meeting customers' demands.

Q. DOES THIS CONCLUDE YOUR PRE-FILED DIRECT TESTIMONY?

A. Yes, it does.