

**New England States Committee on Electricity
Information Requests to Constellation Mystic Power, LLC**

Pursuant to Section II.3 of Schedule 3A (the “Protocols”) of the Amended and Restated Cost-of-Service Agreement among Constellation Mystic Power, LLC (“Mystic”), Exelon Generation Company, LLC, and ISO New England Inc. (“Mystic Agreement”),¹ the New England States Committee on Electricity (“NESCOE”) submits the following information requests to Mystic regarding Mystic’s April 1, 2021 Informational Posting (“2021 Informational Posting”).

Questions regarding these information requests may be directed to Phyllis Kimmel at pkimmel@pgklawoffice.com and Jason Marshall at jasonmarshall@nescoe.com.

The following information requests refer to Attachment A of Mystic’s 2021

Informational Posting:

- 1-1. For each of the following projects, please clarify whether the project costs are (i) no longer being charged to consumers or if (ii) they were added to rate base or (iii) if they were expensed.

Mystic 8&9 Template

- a. [5M8C22001] MYD8 BOP Capital (Row 6)
- b. [5M8C22002] MYD8 GT81 & GT82 Exp Joints 00 (Row 7)
- c. [5M8C22010] MYD8 Transmsn Trnsfrmr Prote (Row 13)
- d. [5M8C22011] MYD8 Generator Projection Refr (Row 14)
- e. [5M8C22012] MYD8 GT SFC Refresh (Row 15)
- f. [5M8C22014] MYD8 UPS Replacement (Row 17)

¹ Aspects of the Mystic Agreement and Protocols are still in dispute at the Federal Energy Regulatory Commission and/or the U.S. Court of Appeals for the D.C. Circuit.

- g. [5M9C22003] MYD9 GT93/GT94 Exp Jts 00 (Row 24)
 - h. [5M9C22004] MYD9 GT93/GT94 Exp Jts 01 (Row 25)
 - i. [5M9C22009] MYD9 Transmsn Trnsfrmr Protec (Row 30)
 - j. [5M9C22010] MYD9 Generator Projection (Row 31)
 - k. [5M9C22013] MYD9 UPS Replacement (Row 33)
- EMT Template
- l. Recoat LNG Storage Tanks (incl Outer Shell Welds) (Row 6)
 - m. [053C20003] DeNOx Refurbishment Repl (SCR) (Row 7)
 - n. Site Water Removal System Improvements (Row 10)
- 1-2. Referring to the Mystic 8 & 9 Template, column D (2022 COS Capex (April 2021 Update)):
- a. Please provide the Mitsubishi Hitachi Power System (“MHPS”) second major inspection report from 2017 and any subsequent MHPS reports related to the CRIs being required on all four gas turbines prior to the retirement the equipment at the end of the Mystic Agreement.
 - b. Please provide the Black & Veatch evaluation that concluded with the recommendation of performing CRIs on all four gas turbines at the next inspection and any documentation from Exelon engineers agreeing with this recommendation.
- 1-3. Please provide documentation such as annual inspection reports, evidence of known service wear, and internal reports that lead to the addition of the MYD8 Compressors (Row 20) on the Cap Ex schedule and the recommendation to replace the equipment.
- 1-4. Please provide documentation such as annual inspection reports, evidence of known service wear, and internal reports that lead to the addition of the following items on the EMT Template tab of the Cap Ex schedule and the recommendation to replace the equipment.
- a. [053C19006] Firewater Main Repl/Upgrade (Row 23)
 - b. [053C19007] HA Bypass for SCR (HAB) Repl (Row 24)
 - c. [053C21005] Forward Bollard (Row 25)
 - d. [053C21008] Secondary Feed (Row 26)

- e. [053C22007] Structural Suppt Upgr-Conduit (Row 27)
- f. [053C22009] Mooring Hooks (Row 28)
- g. [053C220010] Heated Vent Hot Water Piping (Row 29)
- h. [053C22011] Tank Base Heater Replacment (Row 30)

1-5. Please confirm that the following projects are not expected to be completed during the term of the Mystic Agreement:

EMT Template

- a. [053C22002] Jetty/Dock Structure Improvmt (Row 11)
- b. [5M8C22009] MYD8 Waterfront Rip Rap (Row 12)
- c. [053C22006] Plant Steam Modifications (Row 16)
- d. [053C20010] Boil-Off Compressor Upgrade (Row 21)

Mystic 8&9 Template

- e. [5M9C22008] MYD9 Waterfront Rip Rap (Row 29)
- f. [5M9C22015] MYD9 ST 96 Valves (even) (Row 34)

1-6. Referring to the Mystic 8&9 template (Row 41), with respect to the auxiliary boiler:

- a. Please provide documentation that led Mystic to determine that it could make several upgrades to segregate services currently supplied to the auxiliary boiler and fire pump house by the Mystic 7 facility and allow Mystic 8 & 9 to provide these services, specifically electric power, water, air supply, and industrial waste-water.
- b. Please provide any cost build up documentation that supports the revised cost estimate.

1-7. Referring to the EMT template, with respect to Row 14, [053C20011] Cryo Insulation boiler:

- a. Please provide documentation on the scope refinement and inspection reports that led Mystic to reclassify this project and update the cost estimate.
- b. Please provide any cost build up documentation that supports the revised cost estimate.

The following information requests refer to the public version of Attachment C of

Mystic's 2021 Informational Posting:

- 1-8. Referring to Mystic 8 & 9 Schedule A, please provide the actual expenditures for the calendar years 2018, 2019 and 2020 for the following expense line items:
 - a. Production O&M
 - b. Corporate Admin and General
 - c. Other Taxes
- 1-9. Referring to Mystic 8 & 9 Schedule A, please provide the following year end balances for the years 2018, 2019 and 2020 for the following asset accounts:
 - a. Material and Supplies
 - b. Prepayments
- 1-10. Referring to Mystic 8 & 9 Schedule D, Page 1, please clarify if the \$12,000,000 listed on line 23 (cell C29) are the costs related to the previously labeled "Common - Boiler move Costs" that are now shown as "MYD9 Mystic Campus Segregation (line 26). Since the "MYD9 Mystic Campus Segregation" costs are included as RMR CapEx costs in line 26, should the \$12,000,000 amount in line 23 be reduced to \$0? If the answer is "no," please explain.
- 1-11. Referring to Mystic 8 & 9 Schedule D, please confirm or deny that the book depreciation adjustment for the period 7/1/2003 through 6/30/2004 is related only to Mystic 8 & 9. If denied, please provide a detailed breakdown of the total book depreciation for each asset that was impacted by this adjustment (*i.e.*, Mystic 8 & 9, Mystic 7, Mystic Jet, Mystic Common).
- 1-12. Referring to Mystic 8 & 9 Schedule A, please provide a reconciliation and explanation of the Electric Plant in Service amount (Line 1) from what Mystic originally proposed for its Electric Plant in Service in Docket No. ER18-1639.
- 1-13. Referring to Mystic 8 & 9 Schedule D, the Net Plant Adjustment in Row 4 (\$441,418.636), please confirm that this adjustment is the result of complying with FERC's directive to use the original cost test. Please provide supporting documentation to replicate this calculation.
- 1-14. Referring to Mystic 8 & 9 Schedule E, please confirm or deny that the tax basis for determining the excess deferred income taxes should be adjusted for any plant that was not included in the book basis calculation at the end of 2017. If deny, provide a detailed explanation of why the book basis was adjusted from the Compliance filing, but not the tax basis calculation.

- 1-15. Referring to Mystic 8 & 9 Schedule E, please provide the underlying calculation of the hard coded numbers for Mystic 8 & 9 Tax Basis used for determining excess deferred income taxes. Please include all years as well as the detailed components on lines 2-4.
- 1-16. Referring to Mystic 8 & 9 Schedule I, please provide an updated calculation of the Gross Plant Allocator based on the annual gross plant balance that is included on the Mystic 8 & 9 Schedule D. Mystic 8 & 9 Schedule I references Mystic 8 & 9 Schedule D, but the reference does not appear to be correct. If Mystic disagrees that the reference is incorrect, please provide an explanation.
- 1-17. Referring to Mystic 8 & 9 Schedule I, please provide the gross plant detail allocated to Mystic 8 & 9 as of December 31, 2020 for the following:
 - a. Mystic 7
 - b. Mystic Jet
 - c. Mystic Station Common gross plant
 - d. Mystic Station Common
- 1-18. Referring to Everett Schedule A, please provide the actual expenditures for the calendar years 2018, 2019 and 2020 for the following expense line items:
 - a. Production O&M
 - b. Corporate Admin and General
 - c. Other Taxes
- 1-19. Referring to Everett Schedule A, please provide the year end balances for the years 2018, 2019 and 2020 for the following asset accounts:
 - a. Material and Supplies
 - b. Prepayments
- 1-20. Please provide supporting information for all non-formulaic inputs to Mystic 8 & 9 Schedule B.
- 1-21. Please provide supporting information for all non-formulaic inputs to Everett Schedule B.
- 1-22. Regarding Mystic 8 & 9 Schedule H:
 - a. Please provide supporting information for all non-formulaic inputs to Schedule H.
 - b. Please describe the type of costs included in line 11.
- 1-23. Regarding Everett Schedule H:

- a. Please provide supporting information for all non-formulaic inputs to Schedule H.
 - b. Please describe the type of costs included in line 11.
- 1-24. Referring to Mystic 8 & 9 Schedule I:
- a. Please provide supporting information for all non-formulaic inputs to Schedule I.
 - b. Please explain the basis for the use of 0.75 to determine the amount in line 5. Should line 5 be an input? If so please provide supporting information.
- 1-25. Referring to Everett Schedule I, please provide supporting information for all non-formulaic inputs to Schedule I.
- 1-26. Please provided an organization chart detailing the number of employees by position for all on-site labor currently at the Mystic facilities and the expected level of employees during the term of the Mystic Agreement.
- 1-27. Please confirm if any special compensation packages (such as retention bonus, severance pay) are expected during the term of the Mystic Agreement that will be included in Revenue Requirement.
- 1-28. Please provide a detailed breakdown of the \$500 million impairment that was recognized for the New England asset group in the third quarter of 2020 as reported in Exelon Corporation's SEC Form 10K filed February 24, 2021. Provide the amount of the impairment that was directly related to the early retirement of Mystic 8 & 9 and if it is included on the Mystic 8 & 9 Schedule D. Also, provide a brief description of the nature of the impairment.