

PUBLIC (REDACTED)

**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.

- 3-1. Referring to Mystic’s response to NES-MYS-1-1, EMT Template, subpart 1 (Recoat LNG Storage Tanks (incl Outer Shell Welds)):
 - a. Our understanding based on the discussion at the May 20, 2021 technical meeting is that [BEGIN CUI//PRIV-HC] █████ [END CUI//PRIV-HC] of this work will be completed prior to June 1, 2022. Please confirm this understanding or provide an updated estimate.
 - b. How much money has been spent on this project (i) to date and (ii) expected to be spent prior to June 1, 2022?
 - c. Please provide all informal and formal approvals secured for this project and any documentation that establishes this work as the least-cost, commercially-reasonable option.
 - d. Please provide all documentation demonstrating that this recoating project is needed in order for Mystic to meet its obligations under the Mystic Agreement.
 - e. Please provide an estimate of how many years this work extended the life of the storage tanks.

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.

PUBLIC (REDACTED)

f. Please provide the date(s) of the recoating of these tanks in the last twenty years.

3-2. Referring to Mystic's response to NES-MYS-1-2 [BEGIN CUI//PRIV-HC]:

a. [REDACTED]

b. [REDACTED]

c. [REDACTED]

d. [REDACTED]

i. [REDACTED]

ii. [REDACTED]

iii. [REDACTED]

e. [REDACTED]

i. [REDACTED]

ii. [REDACTED]

iii. [REDACTED]

f. [REDACTED]

i. [REDACTED]

ii. [REDACTED]

[END CUI//PRIV-HC]

PUBLIC (REDACTED)

- 3-3. Referring to the statement in Attachment B to Constellation Mystic Power, LLC April 1, 2021 Informational Posting, the Affidavit of Michael Brown and Abigail Piollo-Alam (“Affidavit”), that the 2022 CapEx projects include four CRI Projects “that Mystic would not have otherwise undertaken but for the Mystic Agreement” (Affidavit at P 12):
- a. Please provide any documentation addressing alternative and preferred solutions. Please include any documentation of the final determination of need for the CRI Projects at this time.
 - b. Please provide any documentation demonstrating that the expenses to be incurred related to the CRI Projects are the least-cost commercially reasonable options consistent with Good Utility Practice to meet the obligations of the Mystic Agreement.
 - c. Please provide any financial or cost-benefit analysis completed related to the decision to undergo the CRI Projects.
- 3-4. Referring to the statement in the Affidavit that “The CRI Projects are based on manufacturer specifications – specifically, the OEM programmatic recommendation for the age and use these units” (Affidavit at P 13):
- a. Please provide the OEM programmatic recommendation with a specific reference to the age and use of these units.
- 3-5. Referring to the report provided in privileged attachment NES-MYS-1-02b_ Gas Turbine Rotor Inspection Analysis_CUI-PRIV.pdf:
- a. The report concludes that [BEGIN CUI//PRIV-HC] [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
 - i. [REDACTED]
[REDACTED]
 - ii. [REDACTED]
 - b. [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

PUBLIC (REDACTED)

- i. [REDACTED]
- ii. [REDACTED]
- iii. [REDACTED]
[REDACTED] [END CUI//PRIV-HC]

3-6. Referring to Mystic's response to NES-MYS-1-4, subpart b ([053C19007] HA ByPass for SCR (HAB) Replacement), and to the attachment NES-MYS-1-04b_2-Everett LNG HAB Ducting Failure Analysis_CUI-PRIV [BEGIN CUI//PRIV-HC], [REDACTED]
[REDACTED]

- a. [REDACTED]
[REDACTED]
 - i. [REDACTED]
 - ii. [REDACTED]
[REDACTED]
 - iii. [REDACTED]
[REDACTED]
- b. [REDACTED]
[REDACTED]
- c. [REDACTED]
[REDACTED]
[REDACTED] [END CUI//PRIV-HC]

3-7. Referring to ENC-MYS-1-11_053C19007 - ELF HPE HAB Piping Replacement EPCAC 032421_CUI-PRIV [BEGIN CUI//PRIV-HC]:

- a. [REDACTED]
[REDACTED]
[REDACTED]
- b. [REDACTED]
[REDACTED]
[REDACTED]
- c. [REDACTED]
[REDACTED]

PUBLIC (REDACTED)

- d. [REDACTED]
- e. [REDACTED] [END
CUI//PRIV-HC]

3-8. Referring to Mystic’s response to NES-MYS-1-4, subpart c ([053C21005] Forward Bollard):

- a. Is the failure that was identified in the January 24, 2020 U.S. Coast Guard Report the reason for replacement of the Forward Bollard?
- b. When did this failure occur?
- c. It is our understanding from the discussion at the May 20, 2021 technical meeting that [BEGIN CUI//PRIV-HC] [REDACTED]
- i. [REDACTED] [END CUI//PRIV-HC]
- d. Please explain how the Forward Bollard replacement is necessary for Mystic to meet the obligations of the Mystic Agreement.
- e. Please explain how the Forward Bollard replacement was determined to be the least-cost commercially reasonable option consistent with Good Utility Practice to meet Mystic’s obligations of the Mystic Agreement and provide all documentation supporting this determination.

3-9. Referring to Mystic’s response to NES-MYS-1-4, subpart d ([053C21008] Secondary Feed), and the attachment NES-MYS-1-04d_Eversource Letter to NGRID_CUI-PRIV [BEGIN CUI//PRIV-HC], [REDACTED] [END CUI//PRIV-HC]

3-10. Referring to Mystic’s response to NES-MYS-1-4, subpart f ([053C22009] Mooring Hooks):

- a. Is the failure that was identified in the January 24, 2020 U.S. Coast Guard Report (see Mystic’s response to NES-MYS-1-4) the reason for replacement of the Mooring Hooks?

PUBLIC (REDACTED)

- b. Please explain how the Mooring Hooks replacement is necessary for Mystic to meet the obligations of the Mystic Agreement.
 - c. Please explain how the Mooring Hooks replacement was determined to be the least-cost commercially reasonable option consistent with Good Utility Practice to meet Mystic's obligations of the Mystic Agreement and provide all documentation supporting this determination.
- 3-11. Referring to Mystic's response to NES-MYS-1-4, subpart g ([053C220010] Heated Vent Hot Water Piping), the photo of the piping shown in the response is from May 2020.
- a. Please confirm or deny whether Mystic believes the damage shown in this photo needs be fixed prior to May 31, 2022, and explain your response.
 - b. Please identify which of the [BEGIN CUI//PRIV-HC] [REDACTED] [END CUI//PRIV-HC] the damage identified in the photo of the piping.
 - c. Has the damage to the piping shown in the response been fully repaired? If the answer is no, please identify what repairs still need to be undertaken and when these repairs will be completed.
- 3-12. Referring to Mystic's response to NES-MYS-1-4, subpart h ([053C22011] Tank Base Heater Replacement), and to the attachment NES-MYS-1-04h_1-LNG Tank Upgrade Recommendations CUI-PRIV [BEGIN CUI//PRIV-HC], [REDACTED]
[REDACTED]
[REDACTED]
- a. [REDACTED]
[REDACTED]
 - b. [REDACTED]
[REDACTED] [END CUI//PRIV-HC]
- 3-13. Referring to the EMT Template, [053C22011] Tank Base Heater Replacement (Row 30):
- a. Please explain why the Tank Base Heater Replacement is needed in order to meet Mystic's obligations of the Mystic Agreement and provide any documentation supporting this conclusion.
 - b. Please provide any documentation demonstrating that the Tank Base Heater Replacement was determined to be the least-cost commercially reasonable option consistent with Good Utility Practice to meet the obligations under the Mystic Agreement.

PUBLIC (REDACTED)

- c. Please explain why this project is needed to keep the Mystic 8&9 Units running through June 30, 2024.
- 3-14. Referring to Mystic's response to NES-MYS-1-7, please provide the cost build up documentation that supports the revised cost estimates. If there is no documentation, please state so.
 - 3-15. Referring to Attachment A of Mystic's 2021 Informational Posting, Mystic Template Row 7 [5M8C19009] MYD8 GT 81/82 Exp Jts 01, please provide documentation on the scope refinement and the need to change to linear plates from non-linear plates.
 - 3-16. Mystic's objections to a number of NESCOE's requests state that "the populated version of the template 'only reflects the addition of the costs of the 2022 CapEx Projects' in Schedule D of the Mystic and Everett templates in the row designated as being updated based on the 2021 Informational Filing." This statement was reiterated by Mystic at the May 20, 2021 technical meeting.
 - a. In light of this objection to NES-MYS-1-12, please explain why the Electric Plant in Service amount (Line 1 of Mystic 8&9 Schedule A) is different than what Mystic originally proposed for its Electric Plant in Service in Docket No. ER18-1639.
 - b. In light of this objection to NES-MYS-1-13, please explain why the Net Plant amount (Row 4 of Mystic 8 & 9 Schedule D) is different than what Mystic originally proposed for the Net Plant amount in Docket No. ER18-1639.
 - c. In light of this objection to NES-MYS-1-14, please explain why the accumulated deferred federal income tax balances and the excess deferred income tax balance shown in Mystic 8 & 9 Schedule E are different than the balances originally proposed in Docket No. ER18-1639.
 - d. In light of this objection, please explain why the Electric Plant in Service (line 1), Depreciation Reserve (line 2), Net Plant (line 3), Prepayments (line 9), Rate Base (line 12), Production (line 16) and Total Depreciation Expense (line 17) amounts shown in Mystic 8 & 9 Schedule A are different than the balances originally proposed in Docket No. ER18-1639.