

**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”),<sup>1</sup> Exelon Generation Company, LLC, and ISO New England Inc. (“Mystic Agreement”), the New England States Committee on Electricity (“NESCOE”) submits the following information requests to Mystic regarding Mystic’s April 1, 2022 Informational Posting (“2022 Informational Posting”).

Questions regarding these information requests may be directed to Phyllis Kimmel at [pkimmel@pgklawoffice.com](mailto:pkimmel@pgklawoffice.com) and Jason Marshall at [jasonmarshall@nescoe.com](mailto:jasonmarshall@nescoe.com).

- 2-1. Referring to Section 3.9 of the Cost-of-Service Agreement, please provide the fuel supply plan for the first twelve months of the Term.

**Information Requests Related to Everett:<sup>2</sup>**

- 2-2. Referring to Everett Schedule B, please provide a breakdown of the different types of contracting costs, and provide support and documentation for these costs, including an explanation for and documentation of why these costs are higher than what Mystic filed in the 2021 informational filing.
- 2-3. Referring to Everett WP1:
  - a. Please provide a listing, description, and supporting documentation for [BEGIN CUI//PRIV-HC] [REDACTED] [END CUI//PRIV-HC]

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<sup>1</sup> 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.

<sup>2</sup> These information requests refer to the public version of Attachment B provided with Mystic’s 2022 Informational Posting, and to the populated spreadsheet, “Active\_158130937\_1\_EMT Populated 01 April 2022\_vF,” which includes Schedule F and Workpapers not included in Attachment B. Where NESCOE refers to material provided in Schedule F and the Workpapers, it has marked such material as CUI//PRIV-HC.

b. Please provide an explanation of the factors that led to [BEGIN CUI//PRIV-HC]  
[REDACTED]  
[REDACTED] [END CUI//PRIV-HC]

2-4. Referring to Everett WP1, for each of the following items, please provide a detailed breakdown /listing (including description and dollar amounts) of the items that total to the inputted dollar values, and supporting documentation for the ten largest inputs (by dollar value) included in each items breakdown/listing:

(For example, please provide a breakdown/listing of what items make up the [BEGIN CUI//PRIV-HC] [REDACTED]

[REDACTED]



[REDACTED]

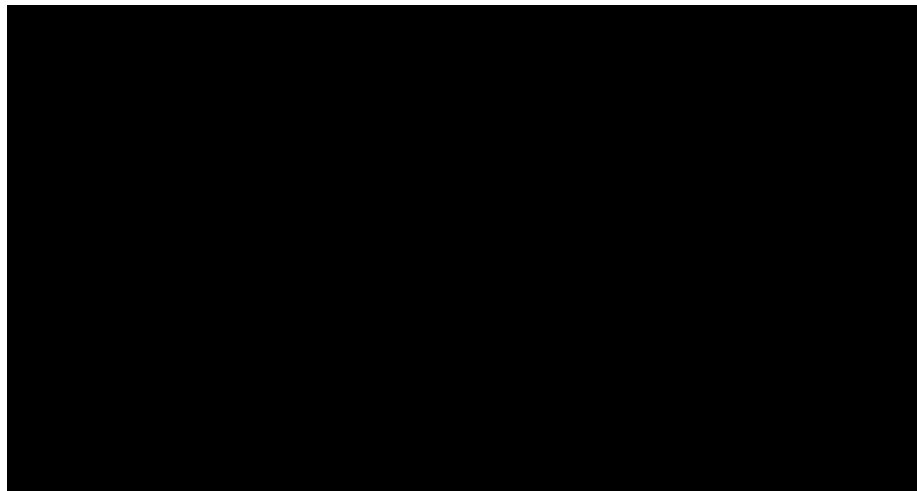
[END CUI//PRIV-HC]

2-5. Referring to Everett Schedule A (line 8) and Schedule F, Materials and Supplies, please provide documentation supporting the inclusion of each item [BEGIN CUI//PRIV-HC] [REDACTED] [END CUI//PRIV-HC]

2-6. Referring to WP 8, if a project was included in the 2021 Informational Filing but omitted from WP8, does this indicate that the project will not be undertaken between June 2022-May 2023?

- 2-7. For each project listed in WP8, please provide documentation such as annual inspection reports, evidence of known service wear, and internal reports that led to the addition of the project and the recommendation to replace or upgrade the equipment.
- 2-8. Referring to Schedule H:
- a. Please provide supporting information for all non-formulaic inputs to Schedule H and to WP7.
  - b. Please explain the process that is used to populate Everett Schedule H and Everett WP7, including how the amounts are derived, what internal systems used, if these systems are audited by internal and/or external auditors and any other information that may provide a better understanding of the extent to which the inputs are reviewed prior to the use in these Schedules/Workpapers.
- 2-9. Referring to Everett WP9, for each of the following items, please provide a detailed breakdown /listing (including description and dollar amounts) of the items that total to the inputted dollar values, and supporting documentation for the ten largest inputs (by dollar value) included in each items breakdown/listing:

(For example, please provide a breakdown/listing of what items make up the **[BEGIN CUI//PRIV-HC]**   




**[END CUI//PRIV-HC]**

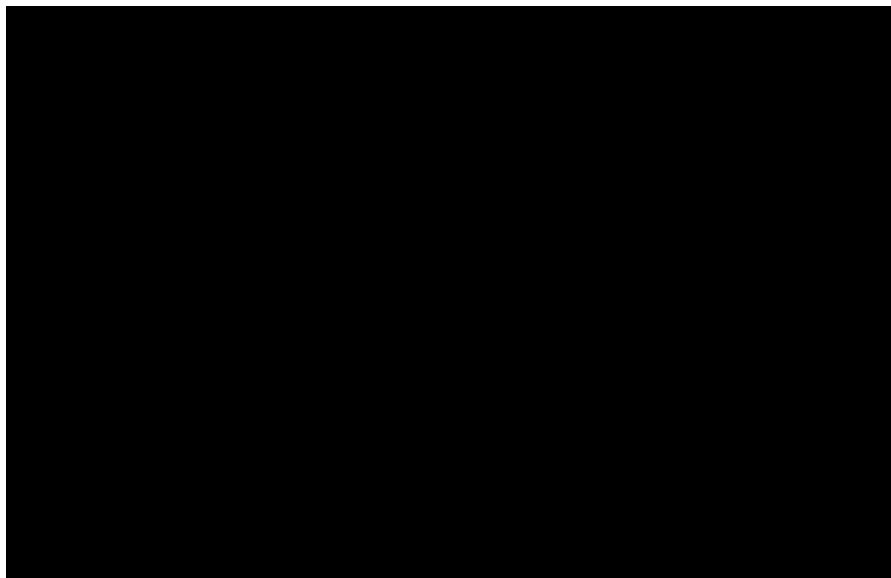
**Information Requests Related to Mystic 8 & 9:**<sup>3</sup>

2-1. Referring to Mystic 8 & 9 WP1, please provide a listing, description, and supporting documentation for [BEGIN CUI//PRIV-HC] [REDACTED] [END CUI//PRIV-HC]

a. Please provide an explanation of the factors that led to [BEGIN CUI//PRIV-HC] [REDACTED] [END CUI//PRIV-HC]

2-2. Referring to Mystic WP1, for each of the following items, please provide a detailed breakdown/listing (including description and dollar amounts) of the items that total to the inputted dollar values, and supporting documentation for the ten largest inputs (by dollar value) included in each items breakdown/listing:

(For example, please provide a breakdown/listing of what items make up the [BEGIN CUI//PRIV-HC] [REDACTED] [REDACTED] [REDACTED])



[END CUI//PRIV-HC]

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<sup>3</sup> These information requests refer to the public version of Attachment B provided with Mystic’s 2022 Informational Posting, and to the populated spreadsheet, ““Active\_158130544\_1\_Mystic89 Populated 01 April 2022\_vF”, which includes Schedule F and Workpapers not included in Attachment B. Where NESCOE refers to material provided in Schedule F and the Workpapers, it has marked such material as CUI//PRIV-HC.

- 2-3. Referring to Mystic 8 & 9 Schedule A (line 8) and Schedule F, Materials and Supplies, please provide documentation supporting [BEGIN CUI//PRIV-HC] [REDACTED] [END CUI//PRIV-HC]
- 2-4. Referring to WP9, if a project was included in the 2021 Informational Filing but omitted from WP9, does this indicate that the project will not be undertaken between June 2022-May 2023?
- 2-5. For each project listed in WP9, please provide documentation such as annual inspection reports, evidence of known service wear, and internal reports that led to the addition of the project and the recommendation to replace or upgrade the equipment.
- 2-6. Regarding Mystic 8 & 9 Schedule H:
- a. Please provide supporting information for all non-formulaic inputs to Schedule H and WP7.
  - b. Please explain the process that is used to populated Schedule H and WP7, including how the amounts are derived, what internal systems used, if these systems are audited by internal and/or external auditors and any other information that may provide a better understanding of the extent to which the inputs are reviewed prior to the use in these Schedules/Workpapers.
- 2-7. Please explain the process that is used to populated Schedule I and WP8, including how the amounts are derived, what internal systems used, if these systems are audited by internal and/or external auditors and any other information that may provide a better understanding of the extent to which the inputs are reviewed prior to the use in these Schedules/Workpapers.
- 2-8. Please confirm or deny that amounts related to the recoating of the EMT LNG storage “Tank Recoating Project” have been removed from Everett’s rate base. (See Mystic’s Response to Formal Challenges at 45-49.) If yes, please identify where in the Workpapers this has been done and [BEGIN CUI//PRIV-HC] [REDACTED] [END CUI//PRIV-HC] If no, please explain why not.
- 2-9. Referring to Mystic 8 & 9 Schedule B, Line 8, if Mystic 8 & 9 had retired, would the property tax expense still have been incurred? Please explain.