

**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”),¹ 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 and Jason Marshall at jasonmarshall@nescoe.com.

- 4-1. Referring to the technical session held May 26, 2022, if not already distributed, please provide an itemization of [BEGIN CUI/PRIV-HC] [REDACTED] [END CUI/PRIV-HC]
- 4-2. Please specify the methodology of calculating the Tank Congestion Charge approved by ISO New England for use pursuant to the Fuel Supply Agreement. Please provide the full model in Excel in its native format, with full documentation of all assumptions.
- 4-3. Please identify the details of the following assumptions used in the in the Tank Congestion Cost Model, and whether any of these assumptions have changed since the model as it stood in 2018:
 - a. [BEGIN CUI/PRIV-HC] [REDACTED]

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.

c.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[END CUI/PRIV-HC]

The following questions refer to Section 3.7 of the Mystic Agreement.

- 4-4. For each of the last three winter periods (i.e., December 1, 2019 – February 29, 2020; December 1, 2020 – February 28, 2021; and December 1, 2021 – February 28, 2022):
- a. How many hours of Capacity Scarcity Conditions occurred?
 - b. How many times was the volume in the storage tank at the LNG Terminal at 8 a.m. of each day:
 - i. less than 510,000 MCF,
 - ii. less than 375,000 MCF or,
 - iii. Less than 330,000 MCF.
 - c. How many times was the amount calculated by subtracting the mid-point price, in \$/MMBtu, for the Henry Hub, as published in Platt's Gas Daily, from the mid-point price, in \$/MMBtu, for the Algonquin City-Gates, as published in Platt's Gas Daily for the relevant day, greater than \$17.50/MMBtu?
 - d. For each of the tank levels in 4-3.b above, please indicate what percentage of the storage capability of the tank that level represents (e.g., 510,000 MCF represent ___ % of the storage capability of the tank).
- 4-5. Asked differently, how many times over the last three years would all of the conditions in Section 3.7 of the Mystic Agreement been met that would have resulted in a winter fuel security penalty being assessed?
- a. What would the expected amount of the penalty have been?