July 28, 2023

Ms. Sallie Tanner, Executive Secretary
Georgia Public Service Commission
244 Washington Street, Suite 127
Atlanta, GA 30334

RE: Constellation NewEnergy - Gas Division, LLC ("Constellation")
Responses to the 98th Set of Staff Data Requests
Docket No. 14675-U

Dear Ms. Tanner:

Please find enclosed an electronic TRADE SECRET version and PUBLIC DISCLOSURE version of **Constellation's Responses to the Staff's 98th Set of Data Requests** in Docket No. 14675.

Constellation is filing TRADE SECRET and PUBLIC DISCLOSURE versions in accordance with the rules of the Georgia Public Service Commission and the Georgia Trade Secrets Act. The reports are being filed under trade secret protection because they contain highly sensitive and confidential information, the public disclosure of which might confer a competitive advantage on Constellation's competitors. Constellation takes reasonable steps to preserve the confidentiality of this information.

If there are any questions regarding this filing, please contact me at 779-231-5789 or amy.klaviter@constellation.com.

Respectfully yours,

Amy Klaviter

Amy Klaviter
Principal Compliance Specialist

Enclosures

PUBLIC DISCLOSURE

BEFORE THE GEORGIA PUBLIC SERVICE COMMISSION

IN RE: ANALYSIS OF THE IMPACT OF NATURAL GAS COMPETITION AND DEREGULATION	} } } }	DOCKET NO. 14675

RESPONSES OF CONSTELLATION NEWENERGY – GAS DIVISION, LLC
TO STAFF'S NINETY-EIGHTH SET OF DATA REQUESTS

COMES NOW, Constellation NewEnergy – Gas Division, LLC ("Constellation") and hereby responds to Staff's NINETY-EIGHTH Set of Data Requests in this docket under oath as follows herein. For each question, the person responding on behalf of Constellation is Mr. Mark Lawrence. Some of the information provided herein is highly proprietary and the public disclosure of such information could create a competitive advantage for other Marketers. Constellation takes reasonable measures to preserve the confidentiality of this information, and it is therefore filed under trade secret protection.

STF-98-1 Beginning with January 1, 2023 and ending with March 31, 2023, please provide weighted average rate for residential customers who were **billed for ONLY variable rate plan(s)**. The weighted average rate should be calculated using the following formula:

(V_1) * (percent of customers on V_1) + (V_2) * (percent of customers on V_2) + (V_3) * (percent of customers on V_3) + … (V_n) * (percent of customers on V_n)

Where V_n equals **ONLY** the variable rates offered to customers during the months of January through March 2023.

In your response, please list **ALL** variable rate plans, the rates, the percent of customers, and the weighted average **(of ALL variable plans) for each month**.

RESPONSE

REDACTED

STF-98-2 Beginning with January 1, 2023 and ending with March 31, 2023, please provide weighted average rate for residential customers who were **billed a customer service charge for variable rate plans ONLY**. The weighted average rate should be calculated using the following formula:

(V_1) * (percent of customers on V_1) + (V_2) * (percent of customers on V_2) + (V_3) * (percent of customers on V_3) + … (V_n) * (percent of customers on V_n)

Where V_n equals the customer service charge **billed to ONLY variable rate plan customers** during the months of January through March 2023.

In your response, please list **ALL** customer service charges, the rates, the percent of customers, and the weighted average **(of all variable rate plans)**.

RESPONSE

REDACTED

STF-98-3 Beginning with January 1, 2023 and ending with March 31, 2023, please provide weighted average rate for residential customers who were **billed ONLY for fixed rate plan(s)**. The weighted average rate should be calculated using the following formula:

(V_1) * (percent of customers on V_1) + (V_2) * (percent of customers on V_2) + (V_3) * (percent of customers on V_3) + … (V_n) * (percent of customers on V_n)

Where V_n equals **ONLY** the fixed rates offered to customers during the months of January through March 2023.
In your response, please list **ALL** fixed rate plan, the rate, the percent of customers and the weighted average **(of all fixed plans).**

RESPONSE

REDACTED

STF-98-4 Beginning with January 1, 2023 and ending with March 31, 2023, please provide weighted average rate for residential customers who were **billed a customer service charge for fixed rate plans ONLY**. The weighted average rate should be calculated using the following formula:

(V_1) * (percent of customers on V_1) + (V_2) * (percent of customers on V_2) + (V_3) * (percent of customers on V_3) + … (V_n) * (percent of customers on V_n)

Where V_n equals the customer service charge **billed to ONLY fixed rate plan customers** during the months of January through March 2023.

In your response, please list **ALL** customer service charges, the rates, the percent of customers, and the weighted average **(of all fixed rate plans)**.

RESPONSE

REDACTED

STF-98-5 Beginning with January 1, 2023 and ending with March 31, 2023, please provide weighted average rate for **ALL** residential customers who were **billed for either a fixed or variable rate plan(s)**. The weighted average rate should be calculated using the following formula:

(V_1) * (percent of customers on V_1) + (V_2) * (percent of customers on V_2) + (V_3) * (percent of customers on V_3) + … (V_n) * (percent of customers on V_n)

Where V_n equals the variable rates offered to customers during the months of January through March 2023.

In your response, please list **ALL** fixed and variable rate plans, the rates, the percent of customers, and the weighted average **(for both rate plans)**.

RESPONSE

REDACTED

STF-98-6 Beginning with January 1, 2023 and ending with March 31, 2023, please provide weighted average rate for residential customers who were **billed a fixed or variable customer service charge**. The weighted average rate should be calculated using the following formula:

(V_1) * (percent of customers on V_1) + (V_2) * (percent of customers on V_2) + (V_3) * (percent of customers on V_3) + … (V_n) * (percent of customers on V_n)

Where V_n equals the customer service charge billed to customers during the months of January through March 2023.

In your response, please list **ALL** customer service charges, the rates, the percent of customers, and the weighted average **(for both fixed and variable plans)**.

RESPONSE

REDACTED

STF-98-7 Please provide the number of customers and the percent of customers on fixed rates and variable rates for the months of January through March 2023.

RESPONSE

	Number of customers	No. of customers on variable rates	% of customers on Variable rates	No. of customers on fixed rates	% of customers on Fixed rates
January 2023					
February 2023					
March 2023					

This response represents residential customers only.

Respectfully submitted this 28th day of July 2023

Amy Klaviter
Principal Compliance Specialist
Constellation
100 N. Riverside Plaza, Suite 900
Chicago, IL 60606
779-231-5789 (Phone)
amy.klaviter@constellation.com

VERIFICATION

Texas

Harris County

Mark Lawrence personally appeared before the undersigned Notary Public and stated under oath that he is a duly authorized representative as **Senior Manager, Retail Operations**, that he is authorized to execute this verification on Constellation NewEnergy - Gas Division, LLC's ("Constellation's") behalf, and that Constellation is filing Trade Secret and Public Disclosure versions of the **Constellation's Responses** in accordance with the rules of the Commission and the Georgia Trade Secrets Act, Article 27 of Chapter 1 of Title 10. **Constellation's Responses** are filed under trade secret protection because it contains highly sensitive and confidential trade secret information, as defined under the Trade Secrets Act. The public disclosure of this trade secret information might confer an advantage on Constellation's competitors. Constellation takes reasonable steps to preserve the confidentiality of this information.

Mark Lawrence further states that, on his information and belief, the facts included in **Constellation's Responses** are true and correct to the best of his knowledge.

This 27th day of July 2023.

Mark Lawrence

Sworn to and subscribed
before me this 27th day
of July, 2023.

NOTARY PUBLIC