FILED
08/28/2026
Executive Secretary G.P.S.C.

Docket # 14675
Document # 228224

BEFORE THE GEORGIA PUBLIC SERVICE COMMISSION

IN RE:	)	
Analysis of the	)	
Impact of Natural	)	Docket No. 14675
Gas Competition	)	
And Deregulation	)	

STAFF'S ONE HUNDRED-ELEVENTH SET OF DATA REQUESTS TO CONSTELLATION ENERGY

TO: Patricia Chang
Constellation NewEnergy Gas Division
1001 Louisiana Street, Suite 2300
Houston, Texas 77002
Patricia.Chang@constellation.com

COMES NOW the Georgia Public Service Commission Staff (Staff) and, pursuant to the authority vested in it by the Georgia Public Service Commission (Commission) pursuant to O.C.G.A. § 46-2-57, herein propounds the following interrogatories and requests for production of documents (collectively, "data requests"), to be answered under oath by Constellation, or its designated representatives. Constellation has Thirty (30) days to respond to data requests. The Company shall file with the Executive Secretary's Office using the Alternative E-filing instructions. Public and Trade Secret responses shall be Accompanied therewith shall be an electronic version in Microsoft Word® format for text documents and Excel® for spreadsheets.

Please provide responses on or before 4:00 p. m. on September 30, 2026.

INSTRUCTIONS

a) These requests shall be deemed to be continuing. The Respondent is obliged to change, supplement, and correct all answers to requests to conform to available information, including such information as first comes available to the Respondent after the answers are hereto filed.

b) The answers provided should first restate the question asked and also identify the person(s) supplying the information.

c) All information is to be divulged that is within the knowledge, possession, control, or custody of the Respondent be reasonably ascertained thereby.

d) As used herein the "document" included, but is not limited to, the original and all copies (regardless of origin and whether or not including additional writing thereon or attached thereto) of memoranda, reports, books, manuals, instructions, directives, records, forms, notes, letters, notices, confirmations, telephone calls, meetings or other communications, bulletins, transcripts, diaries, analyses, summaries, correspondence and enclosures, circulars, opinions, studies, investigations, questionnaires and surveys, work sheets, and all drafts, preliminary versions, alterations, modifications, revisions, changes, amendments and written comments concerning the foregoing, in whatever form, stored or contained in or on whatever medium including computerized memory or magnetic media.

DATA REQUEST

***Please provide all responses in an Excel spreadsheet with formulas intact.**

STF-111-1 For April 1, 2026 through June 30, 2026, 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) * (% of customers on V_1) + (V_2) * (% of customers on V_2) + (V_3) * (% of customers on V_3) + ... (V_n) * (% of customers on V_n)

Where V_n = **ONLY** the variable rates offered to customers during the months of April through June 2026.

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**.

Please provide for the months of April, May, and June 2026 (format below).

Month			
Variable Rate Plans	**Rate**	**% of Customers**	**Weighted Avg Rate**
Combo Plan	$0.00	0.00%	$0.00
XYZ Select	$0.00	0.00%	$0.00
1234 Senior	$0.00	0.00%	$0.00
Two Ton Savings	$0.00	0.00%	$0.00
Weighted Avg Rate	**$0.00**	**0.00%**	**$0.00**

STF-111-2 For April 1, 2026 through June 30, 2026, 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) * (% of customers on V_1) + (V_2) * (% of customers on V_2) + (V_3) * (% of customers on V_3) + ... (V_n) * (% of customers on V_n)

Where V_n = the customer service charge billed to **ONLY** variable rate plan customers during the months of April through June 2026.

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

Please provide for the months of April, May, and June 2026 (format below).

Month			
Variable Rate Plans	**Rate**	**% of Customers**	**Weighted Avg Rate**
Combo Plan	$0.00	0.00%	$0.00
XYZ Select	$0.00	0.00%	$0.00
1234 Senior	$0.00	0.00%	$0.00
Two Ton Savings	$0.00	0.00%	$0.00
Weighted Avg Rate	**$0.00**	**0.00%**	**$0.00**

STF-111-3 For April 1, 2026 through June 30, 2026, 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) * (% of customers on V_1) + (V_2) * (% of customers on V_2) + (V_3) * (% of customers on V_3) + ... (V_n) * (% of customers on V_n)

Where V_n = **ONLY** the fixed rates offered to customers during the months of April through June 2026.

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

Please provide for the months of April, May, and June 2026 (format below).

Month			
Fixed Rate Plans	**Rate**	**% of Customers**	**Weighted Avg Rate**
Combo Plan	$0.00	0.00%	$0.00
XYZ Select	$0.00	0.00%	$0.00
1234 Senior	$0.00	0.00%	$0.00
Two Ton Savings	$0.00	0.00%	$0.00
Weighted Avg Rate	**$0.00**	**0.00%**	**$0.00**

STF-111-4 For April 1, 2026 through June 30, 2026, 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) * (% of customers on V_1) + (V_2) * (% of customers on V_2) + (V_3) * (% of customers on V_3) + ... (V_n) * (% of customers on V_n)

Where V_n = **the customer service charge billed to ONLY fixed rate plan customers** during the months of April through June 2026.

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

Please provide for the months of April, May, and June 2026 (format below).

Month			
Fixed Rate Plans	**Rate**	**% of Customers**	**Weighted Avg Rate**
Combo Plan	$0.00	0.00%	$0.00
XYZ Select	$0.00	0.00%	$0.00
1234 Senior	$0.00	0.00%	$0.00
Two Ton Savings	$0.00	0.00%	$0.00
Weighted Avg Rate	**$0.00**	**0.00%**	**$0.00**

STF-111-5 For April 1, 2026 through June 30, 2026, 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) * (% of customers on V_1) + (V_2) * (% of customers on V_2) + (V_3) * (% of customers on V_3) + ... (V_n) * (% of customers on V_n)

Where V_n = the fixed or variable rates offered to customers during the months of April through June 2026.

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

Please provide for the months of April, May, and June 2026 (format below).

Month			
Fixed & Variable Rate Plans	**Rate**	**% of Customers**	**Weighted Avg Rate**
Combo Plan	$0.00	0.00%	$0.00
XYZ Select	$0.00	0.00%	$0.00
1234 Senior	$0.00	0.00%	$0.00
Two Ton Savings	$0.00	0.00%	$0.00
Weighted Avg Rate	**$0.00**	**0.00%**	**$0.00**

STF-111-6 For April 1, 2026 through June 30, 2026, 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) * (% of customers on V_1) + (V_2) * (% of customers on V_2) + (V_3) * (% of customers on V_3) + ... (V_n) * (% of customers on V_n)

Where V_n = the customer service charge billed to customers during the months of April through June 2026.

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

Please provide for the months of April, May, and June 2026 (format below).

Month			
Fixed & Variable Rate Plans	**Rate**	**% of Customers**	**Weighted Avg Rate**
Combo Plan	$0.00	0.00%	$0.00
XYZ Select	$0.00	0.00%	$0.00
1234 Senior	$0.00	0.00%	$0.00
Two Ton Savings	$0.00	0.00%	$0.00
Weighted Avg Rate	**$0.00**	**0.00%**	**$0.00**

STF-111-7 Using the format below, please provide the number of customers and the percent of customers on variable rates and fixed rates for the months of April through June 2026.

NOTE: Sample numbers below.

	# of customers	# of Customers on Variable Rates	% of Customers on Variable Rates	# of Customers on Fixed Rates	% of Customers on Fixed Rates
April	1000	300	30%	700	70%
May	1000	400	40%	600	60%
June	1000	350	35%	650	65%

CERTIFICATE OF SERVICE

DOCKET NO. 14675

IN RE:	)	
Adoption of Amendments to	)	
Commission Utility Rule	)	Docket No. 14675
515-7-3: Marketer Certificate	)	
Of Authority	)	

I, the undersigned, do herewith certify that I have caused to be served the required copies of the enclosed Data Request from Staff to Constellation Energy. All parties are being provided an electronic copy.

Sallie Tanner
Executive Secretary
Georgia Public Service Commission
244 Washington St., S. W.
Atlanta, GA 30334

Patricia Chang
Senior State Government Affairs Manager
Constellation Energy
116 John Street
Lowell, Massachusetts 01852
Patricia.Chang@constellation.com

Dannieka McLean
Analyst, Legal Compliance
Constellation Energy
1310 Point Street
Legal – 8th floor
Baltimore, MD 21231
dannieka.mclean@constellation.com
Adrienne.Mouton-Henderson@constellation.com

Respectfully submitted, this 31st day of August 2026

Diana Cain