ORIGINAL

M.K.P.U.C. Case No. DE 10-160

Exhibit No. #19

Witness Allegrette

DO NOT REMOVE FROM FILE

## **DOCKET NO. DE 10-160**

RESPONSE OF CONSTELLATION ENERGY COMMODITIES GROUP, INC., CONSTELLATION NEWENERGY, INC. AND THE RETAIL ENERGY SUPPLY ASSOCIATION TO THE PUBLIC SERVICE COMPANY OF NEW HAMPSHIRE FIRST SET OF DATA REQUESTS

Received on September 27, 2010 Responded to on October 12, 2010 Responding witness: Daniel Allegretti

## Request No. PSNH - 6

Page 7 line 15: Please provide a generic explanation of how Constellation Energy Commodities Group, as a competitive marketer, develops the prices it offer into RFPs for FRS such as those it has submitted to Unitil and Granite State Electric. At a minimum, in your response please address how each of the following considerations are forecast:

- a. capacity,
- b. energy,
- c. forward reserves,
- d. real-time operating reserves,
- e. regulation,
- f. ARRs,
- g. NCPC charges,
- h. volume risk,
- i. price risk, and
- j. profit.

If there are cost components not identified add them.

## Response:

Constellation objects to this request as overly broad, unduly burdensome and not likely to lead to the discovery of evidence that is relevant to the issues at scope in this proceeding. Constellation further objects to this request as it seeks highly proprietary, confidential and trade secret information. Notwithstanding and without waiving such general and specific objections, in general Constellation Energy Commodities Group, Inc. forms its view as to the forward costs of each of these products based upon its experience in trading natural gas, electricity and related products and in providing load-following service in New England and elsewhere, its observations of the marketplace, analysis of publicly-available data and its own internal proprietary models.

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