

# Welcome to your CDP Water Security Questionnaire 2022

# **W0. Introduction**

#### W0.1

#### (W0.1) Give a general description of and introduction to your organization.

We are the nation's largest producer of carbon-free energy and the leading competitive retail supplier of power and energy products and services for homes and businesses across the United States. Headquartered in Baltimore, our generation fleet powers more than 20 million homes and is helping to accelerate the nation's transition to clean energy with more than 32,400 megawatts of capacity and annual output that is 90 percent carbon-free.

As this is our first year as a separate independent company, we are still in the process of refining our sustainability strategy and programs. Therefore, we have opted to respond to the minimum version of this year's CDP Water Security questionnaire. We plan to respond to the full questionnaire in 2023. For more information about Constellation's sustainability strategy, please see the inaugural 2022 Constellation Sustainability Report at www.constellationenergy.com/csr.

### **W-EU0.1a**

#### (W-EU0.1a) Which activities in the electric utilities sector does your organization engage in?

Electricity generation



## **W-EU0.1**b

# (W-EU0.1b) For your electricity generation activities, provide details of your nameplate capacity and the generation for each technology.

|                                                           | Nameplate capacity (MW) | % of total nameplate capacity | Gross electricity generation (GWh) |
|-----------------------------------------------------------|-------------------------|-------------------------------|------------------------------------|
| Coal – hard                                               | 0                       | 0                             | 0                                  |
| Lignite                                                   | 0                       | 0                             | 0                                  |
| Oil                                                       | 1,104                   | 3.29                          | 28                                 |
| Gas                                                       | 8,226                   | 24.49                         | 19,972                             |
| Biomass                                                   | 0                       | 0                             | 0                                  |
| Waste (non-biomass)                                       | 0                       | 0                             | 0                                  |
| Nuclear                                                   | 20,899                  | 62.21                         | 162,891                            |
| Fossil-fuel plants fitted with carbon capture and storage | 0                       | 0                             | 0                                  |
| Geothermal                                                | 0                       | 0                             | 0                                  |
| Hydropower                                                | 1,642                   | 4.89                          | 3,948                              |
| Wind                                                      | 1,463                   | 4.35                          | 4,052                              |
| Solar                                                     | 250                     | 0.74                          | 596                                |
| Marine                                                    | 0                       | 0                             | 0                                  |
| Other renewable                                           | 10                      | 0.03                          | 0                                  |
| Other non-renewable                                       | 0                       | 0                             | 0                                  |
| Total                                                     | 33,594                  | 100                           | 191,487                            |



### W0.2

#### (W0.2) State the start and end date of the year for which you are reporting data.

|                | Start date      | End date          |
|----------------|-----------------|-------------------|
| Reporting year | January 1, 2021 | December 31, 2021 |

#### W0.3

#### (W0.3) Select the countries/areas in which you operate.

Canada United States of America

#### W0.4

(W0.4) Select the currency used for all financial information disclosed throughout your response. USD

#### W0.5

(W0.5) Select the option that best describes the reporting boundary for companies, entities, or groups for which water impacts on your business are being reported.

Companies, entities or groups over which operational control is exercised

#### W0.6

(W0.6) Within this boundary, are there any geographies, facilities, water aspects, or other exclusions from your disclosure? No



### W0.7

#### (W0.7) Does your organization have an ISIN code or another unique identifier (e.g., Ticker, CUSIP, etc.)?

| Indicate whether you are able to provide a unique identifier for your organization. | Provide your unique identifier |
|-------------------------------------------------------------------------------------|--------------------------------|
| Yes, an ISIN code                                                                   | US21037T1097                   |

# W1. Current state

### W1.1

(W1.1) Rate the importance (current and future) of water quality and water quantity to the success of your business.

|                                                                       | Direct use<br>importance<br>rating | Indirect use<br>importance<br>rating | Please explain                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
|-----------------------------------------------------------------------|------------------------------------|--------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Sufficient amounts of<br>good quality freshwater<br>available for use | Important                          | Neutral                              | Access to affordable, reliable and adequate water supplies is imperative to the success of our business. Direct water access supports our zero-emission hydroelectric and nuclear facilities and our fossil fuel steam power plants. While water quality is a consideration, access to sufficient volume is more of a concern. In 2021, we withdrew 53.5 million megaliters of water, 99 percent of which our facilities returned to the source. We have consistently achieved annual discharge rates above 98 percent since 2019. Water supply has not been a significant challenge to date; however, we continue to assess our risks, evaluate our impacts and closely monitor our watersheds on an ongoing basis. We engage the communities in our watershed through environmental education and sustainability initiatives. Like direct importance, indirect importance is more dependent on quantity than quality; therefore, we rate it as neutral. Our largest upstream dependence is on fuels and purchased power for resale. Our products have de minimis requirements for water at the end point of use. |



|                                                                                           |           |         | Constellation uses water primarily as a cooling medium in our nuclear and natural gas power plants, and condenses steam after it passes through steam-turbine generators. Constellation uses closed-cycle cooling systems for a portion of our generating capacity. Closed-cycle cooling systems use a dedicated tower or pond to evaporate and recirculate, thereby reusing water. These systems use and discharge less water than open-cycle cooling systems, and in 2021, our nuclear assets recycled more than seven million megaliters of water through these systems. Our remaining fleet uses open-cycle cooling systems where water is withdrawn from a water body and then returned directly to its source. In open-cycle cooling systems, a small percentage of water is lost to evaporation. Where dry condenser cooling technologies are used, ambient air cools and condenses steam, requiring little to no water.                                                                       |
|-------------------------------------------------------------------------------------------|-----------|---------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Sufficient amounts of<br>recycled, brackish and/or<br>produced water available<br>for use | Important | Neutral | Our nuclear and fossil plants located in saline watersheds depend directly on brackish water<br>for cooling. Our Limerick nuclear plant collaborated with regulators and environmental<br>stakeholders to develop a flow augmentation alternative that uses upriver mine water to<br>supplement flow in the Schuylkill River. Adequate, affordable and reliable water supplies to<br>support our indirect operations have not been a challenge to date; however, we continue to<br>assess our risks, evaluate our impacts and closely monitor our watersheds on an ongoing<br>basis. We engage the communities in our watersheds' improvement, environmental<br>education and sustainability initiatives. Like direct importance, indirect importance is more<br>dependent on quantity than quality; therefore, we rate it as neutral. Our largest upstream<br>dependence is on fuels and purchased power for resale. Our products have de minimis<br>requirements for water at the end point of use. |

### W1.2

#### (W1.2) Across all your operations, what proportion of the following water aspects are regularly measured and monitored?

| % of                        | Please explain |
|-----------------------------|----------------|
| sites/facilities/operations |                |



| Water withdrawals – total<br>volumes              | 100% | We measure all water inflows and outflows by source (including dedicated cooling ponds) in accordance with permit and/or internal performance monitoring requirements and methodology specifications for both quantitative and qualitative aspects of water use (e.g. sensor or meter type, calibration frequency, testing) defined by the engineering department of individual operating companies or sites. |
|---------------------------------------------------|------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Water withdrawals – volumes<br>by source          | 100% | We measure all water inflows and outflows by source (including dedicated cooling ponds) in accordance with permit and/or internal performance monitoring requirements and methodology specifications for both quantitative and qualitative aspects of water use (e.g. sensor or meter type, calibration frequency, testing) defined by the engineering department of individual operating companies or sites. |
| Water withdrawals quality                         | 100% | We monitor water quality of all withdrawals as necessary to meet the performance requirements of our systems in accordance with permit and/or internal performance monitoring requirements and methodology specifications (e.g. sensor or meter type, calibration frequency, testing) defined by the engineering department of individual operating companies or sites.                                       |
| Water discharges – total<br>volumes               | 100% | We measure all water inflows and outflows by source (including dedicated cooling ponds) in accordance with permit and/or internal performance monitoring requirements and methodology specifications of our systems (e.g. sensor or meter type, calibration frequency, testing) defined by the engineering department of individual operating companies or sites.                                             |
| Water discharges – volumes<br>by destination      | 100% | We measure all water inflows and outflows by source (included dedicated cooling ponds) by source and destination water bodies in accordance with permit and/or internal performance monitoring requirements and methodology specifications (e.g. sensor or meter type, calibration frequency, testing) defined by the engineering department of individual operating companies or sites.                      |
| Water discharges – volumes<br>by treatment method | 100% | We monitor all discharges by treatment and/or use methods in accordance with permit and/or internal performance monitoring requirements and methodology specifications (e.g. sensor or meter type, calibration frequency, testing) defined by the engineering department of individual operating companies or sites.                                                                                          |



| Water discharge quality – by standard effluent parameters                              | 100% | We monitor and report standard effluent parameters including chemical constituents and temperature in accordance with our various operating permits and methodology specifications (e.g. sensor or meter type, calibration frequency, testing) defined by engineering department of individual operating companies or sites.                                      |
|----------------------------------------------------------------------------------------|------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Water discharge quality –<br>temperature                                               | 100% | We monitor and report standard effluent parameters including chemical constituents and temperature in accordance with our various operating permits and methodology specifications (e.g. sensor or meter type, calibration frequency, testing) defined by engineering department of individual operating companies or sites.                                      |
| Water consumption – total<br>volume                                                    | 100% | We measure and report total water consumption (withdrawal minus discharge) for all of our water use in accordance with permit and/or internal performance monitoring requirements and methodology specifications (e.g. sensor or meter type, calibration frequency, testing) defined by the engineering department of individual operating companies or sites.    |
| Water recycled/reused                                                                  | 100% | We measure the volume of recycled water at all facilities that generate or use recycled water<br>in accordance with permit and/or internal performance monitoring requirements and<br>methodology specifications (e.g. sensor or meter type, calibration frequency, testing) defined<br>by the engineering department of individual operating companies or sites. |
| The provision of fully-<br>functioning, safely managed<br>WASH services to all workers | 100% | We provide WASH services in all facilities. We meet all drinking and sanitary water needs of our facilities.                                                                                                                                                                                                                                                      |

### **W-EU1.2a**

(W-EU1.2a) For your hydropower operations, what proportion of the following water aspects are regularly measured and monitored?

| % of sites/facilities/operations | Please explain |
|----------------------------------|----------------|
| measured and monitored           |                |



| Fulfilment of<br>downstream<br>environmental flows | 100%         | We fulfil downstream environmental flow commitments in accordance with company policy and/or permit requirements that establish minimum flow requirements and, monitoring frequency and methodology specifications (e.g. sensor or meter type, calibration frequency, testing) defined by the engineering department of individual operating companies or sites. |
|----------------------------------------------------|--------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Sediment loading                                   | 100%         | We monitor and report standard effluent parameters including sediment parameters in accordance with company policy and/or our various operating permits and methodology specifications (e.g. sensor or meter type, calibration frequency, testing) defined by engineering department of individual operating companies or sites.                                 |
| Other, please specify                              | Not relevant | Not applicable                                                                                                                                                                                                                                                                                                                                                   |

### W1.2b

(W1.2b) What are the total volumes of water withdrawn, discharged, and consumed across all your operations, and how do these volumes compare to the previous reporting year?

|                   | Volume (megaliters/year) | Comparison with previous reporting year | Please explain |
|-------------------|--------------------------|-----------------------------------------|----------------|
| Total withdrawals | 53,485,702               | Higher                                  |                |
| Total discharges  | 52,807,159               | Higher                                  |                |
| Total consumption | 678,542                  | About the same                          |                |

## W1.2d

(W1.2d) Indicate whether water is withdrawn from areas with water stress and provide the proportion.

|       | Withdrawals are from areas with water stress | Please explain |
|-------|----------------------------------------------|----------------|
| Row 1 |                                              |                |



### W1.2h

#### (W1.2h) Provide total water withdrawal data by source.

|                                                                                  | Relevance | Please explain |
|----------------------------------------------------------------------------------|-----------|----------------|
| Fresh surface water, including rainwater, water from wetlands, rivers, and lakes |           |                |
| Brackish surface water/Seawater                                                  |           |                |
| Groundwater – renewable                                                          |           |                |
| Groundwater – non-renewable                                                      |           |                |
| Produced/Entrained water                                                         |           |                |
| Third party sources                                                              |           |                |

### W1.2i

#### (W1.2i) Provide total water discharge data by destination.

|                                 | Relevance | Please explain |
|---------------------------------|-----------|----------------|
| Fresh surface water             |           |                |
| Brackish surface water/seawater |           |                |
| Groundwater                     |           |                |
| Third-party destinations        |           |                |

### W1.2j

#### (W1.2j) Within your direct operations, indicate the highest level(s) to which you treat your discharge.

|                    | Relevance of treatment level to discharge | Please explain |
|--------------------|-------------------------------------------|----------------|
| Tertiary treatment |                                           |                |



| Secondary treatment                                    |  |
|--------------------------------------------------------|--|
| Primary treatment only                                 |  |
| Discharge to the natural environment without treatment |  |
| Discharge to a third party without treatment           |  |
| Other                                                  |  |

#### W1.3

#### (W1.3) Provide a figure for your organization's total water withdrawal efficiency.

|       | Revenue        | Total water withdrawal volume (megaliters) | Total water withdrawal efficiency | Anticipated forward trend |
|-------|----------------|--------------------------------------------|-----------------------------------|---------------------------|
| Row 1 | 19,649,000,000 | 53,485,702                                 | 367.3692083166                    |                           |

### **W-EU1.3**

(W-EU1.3) Do you calculate water intensity for your electricity generation activities?

#### W1.4

(W1.4) Do you engage with your value chain on water-related issues?

# W2. Business impacts

#### W2.1

(W2.1) Has your organization experienced any detrimental water-related impacts?



#### No

### W2.2

(W2.2) In the reporting year, was your organization subject to any fines, enforcement orders, and/or other penalties for water-related regulatory violations?

Yes, fines, enforcement orders or other penalties but none that are considered as significant

### W2.2a

(W2.2a) Provide the total number and financial value of all water-related fines.

| ow 1                                                |  |  |
|-----------------------------------------------------|--|--|
| Total number of fines                               |  |  |
| 0                                                   |  |  |
| Total value of fines                                |  |  |
| 0                                                   |  |  |
| % of total facilities/operations associated         |  |  |
| 0                                                   |  |  |
| Number of fines compared to previous reporting year |  |  |
| This is our first year of measurement               |  |  |

#### Comment

None of the water-related regulatory violations we received in 2021 resulted in a monetary fine.



# **W3. Procedures**

#### **W-EU3.1**

# (W-EU3.1) How does your organization identify and classify potential water pollutants associated with your business activities in the electric utilities sector that could have a detrimental impact on water ecosystems or human health?

Under the federal Clean Water Act, NPDES permits for discharges into waterways are required to be obtained from the EPA or from the state environmental agency to which the permit program has been delegated; permits must be renewed periodically. Certain of Constellation's facilities discharge storm water and industrial wastewater into waterways and are therefore subject to these regulations and operate under NPDES permits or pending applications for renewals of such permits after being granted an administrative extension. Constellation is also subject to the jurisdiction of the Delaware River Basin Commission and the Susquehanna River Basin Commission, regional agencies that primarily regulate water use.

Potential water pollutants associated with our business activities are identified and classified based upon parameters to be monitored and measured in accordance with facility permit requirements. In addition, potential pollutants of concern may be identified through organizations that focus on protecting watersheds or Total Maximum Daily Load (TMDL) limits in watersheds where we have operations such as the Delaware River watershed where we monitor PCB parameters as a result of a PCB TMDL in the watershed. Typical permit parameters can address water quality aspects from pH, temperature, dissolved oxygen, total suspended solids among others, and can vary across our operations depending upon the specific type of generating facility (e.g. nuclear, fossil, etc.) as well as geographical location and prevailing watershed characteristics. These aspects are considered across our value chain based upon individual facility and watershed characteristics such as TMDLs or other specific situations.

### W-EU3.1a

(W-EU3.1a) Describe how your organization minimizes the adverse impacts of potential water pollutants associated with your activities in the electric utilities sector on water ecosystems or human health.

| Potential water | Description of water    | Management procedures | Please explain |
|-----------------|-------------------------|-----------------------|----------------|
| pollutant       | pollutant and potential |                       |                |
|                 | impacts                 |                       |                |



| Hydrocarbons               | • Oil and grease – potential<br>surface water impacts in<br>immediate receiving water<br>body | Compliance with effluent<br>quality standards<br>Measures to prevent<br>spillage, leaching, and<br>leakages<br>Community/stakeholder<br>engagement<br>Emergency preparedness | Environmental monitoring is conducted in accordance with applicable permit<br>requirements and company procedures. Successful implementation is<br>assessed through sampling, tracking of self-identified permit non-<br>compliances or other regulatory notifications. Our facilities utilize SPCC plans<br>and regularly review and update them to control potential impacts of oil and<br>grease.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
|----------------------------|-----------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Radiation                  | • Radionuclides – potential<br>for localized surface or<br>groundwater impacts                | Compliance with effluent<br>quality standards<br>Measures to prevent<br>spillage, leaching, and<br>leakages<br>Community/stakeholder<br>engagement<br>Emergency preparedness | Environmental monitoring is conducted in accordance with applicable permit<br>requirements. Constellation has adopted a Radiological Groundwater<br>Protection program that includes a robust groundwater monitoring program<br>designed by a third-party environmental engineering firm. Samples are<br>obtained from wells at least quarterly and are reviewed by station personnel,<br>a corporate geologist and a third-party geologist to identify and respond to<br>impacts, if any. In addition, we have procedures that outline monitoring and<br>ground water protection program objectives at our facilities which follow the<br>Nuclear Energy Institute's NEI-07-07 Rev 1 Ground Water Protection<br>Initiative Guidance Document which also includes communication to federal,<br>state and local stakeholders. Monitoring is also conducted in accordance with<br>the NRC REMP/RETS program requirements. Successful implementation is<br>assessed through sampling, tracking of self-identified non-compliances or<br>other regulatory notifications. |
| Contaminated cooling water | • Radionuclides, other contaminants                                                           | Compliance with effluent<br>quality standards<br>Measures to prevent<br>spillage, leaching, and<br>leakages                                                                  | Environmental monitoring is conducted in accordance with applicable permit<br>requirements. Cooling water is non-contact and does not typically contain<br>station derived radionuclides or other contaminants, and is monitored to<br>ensure compliance with all environmental permits. Successful implementation<br>is assessed through sampling, tracking of self-identified permit non-<br>compliances or other regulatory notifications.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |



|                                       |                                                                                                        | Community/stakeholder<br>engagement<br>Emergency preparedness                                                                                                                |                                                                                                                                                                                                                                                                                                                                                                                                                                |
|---------------------------------------|--------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Thermal<br>pollution                  | • Temperature – potential for<br>surface water impacts in<br>immediate receiving water<br>body         | Compliance with effluent<br>quality standards<br>Measures to prevent<br>spillage, leaching, and<br>leakages<br>Community/stakeholder<br>engagement<br>Emergency preparedness | Environmental monitoring is conducted in accordance with applicable permit<br>requirements and company procedures. Successful implementation is<br>assessed through sampling, tracking of self-identified permit non-<br>compliances or other regulatory notifications.                                                                                                                                                        |
| Other, please<br>specify<br>PCBs      | • PCBs – potential surface<br>water impacts in immediate<br>receiving water body                       | Compliance with effluent<br>quality standards<br>Measures to prevent<br>spillage, leaching, and<br>leakages<br>Community/stakeholder<br>engagement<br>Emergency preparedness | Environmental monitoring is conducted in accordance with applicable permit<br>requirements and company procedures. Successful implementation is<br>assessed through sampling, tracking of self-identified, permit non-<br>compliances or other regulatory notifications. We are also performing<br>targeted replacement of equipment containing PCBs across our utility<br>businesses reducing the likelihood of PCB releases. |
| Other, please<br>specify<br>Nutrients | • Nitrogen and Phosphorus -<br>potential surface water<br>impacts in immediate<br>receiving water body | Compliance with effluent<br>quality standards<br>Measures to prevent<br>spillage, leaching, and<br>leakages<br>Community/stakeholder<br>engagement<br>Emergency preparedness | Environmental monitoring is conducted in accordance with applicable permit<br>requirements and company procedures. Successful implementation is<br>assessed through sampling, tracking of self-identified permit non-<br>compliances or other regulatory notifications.                                                                                                                                                        |



| Other, please | CBOD, COD – potential     | Compliance with effluent | Environmental monitoring is conducted in accordance with applicable permit |
|---------------|---------------------------|--------------------------|----------------------------------------------------------------------------|
| specify       | surface water impacts in  | quality standards        | requirements and company procedures. Successful implementation is          |
| Dissolved     | immediate receiving water | Measures to prevent      | assessed through sampling, tracking of self-identified permit non-         |
| oxygen        | body                      | spillage, leaching, and  | compliances or other regulatory notifications.                             |
|               |                           | leakages                 |                                                                            |
|               |                           | Community/stakeholder    |                                                                            |
|               |                           | engagement               |                                                                            |
|               |                           | Emergency preparedness   |                                                                            |

### W3.3

#### (W3.3) Does your organization undertake a water-related risk assessment?

No, water risks-related are not assessed

### W3.3c

#### (W3.3c) Why does your organization not undertake a water-related risk assessment?

|          | Primary reason                                                    | Please explain                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
|----------|-------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Row<br>1 | Other, please<br>specify<br>See the<br>"Please<br>explain" field. | As this is our first year as a separate independent company, we are still in the process of refining our sustainability strategy and programs. Therefore, we have opted to respond to the minimum version of this year's CDP Water Security questionnaire. We plan to respond to the full questionnaire in 2023.<br>We selected the "No, water risks-related are not assessed" option in W3.3 because we are not currently in a position to provide the level of detail required on our procedures for identifying and assessing water-related risks at this time. In reality, we do have robust procedures in place, and we will look to provide more details on those in next year's CDP Water Security questionnaire response. For more information about our water management practices, please see the Water Management section of our 2022 Sustainability Report at www.constellationenergy.com/csr. |



# W4. Risks and opportunities

### W4.1

(W4.1) Have you identified any inherent water-related risks with the potential to have a substantive financial or strategic impact on your business?

No

#### W4.1a

#### (W4.1a) How does your organization define substantive financial or strategic impact on your business?

As this is our first year as a separate independent company, we are still in the process of refining our sustainability strategy and programs. Therefore, we have opted to respond to the minimum version of this year's CDP Water Security questionnaire. We plan to respond to the full questionnaire in 2023. For more information about Constellation's sustainability strategy, please see the inaugural 2022 Constellation Sustainability Report at www.constellationenergy.com/csr.

#### W4.2b

(W4.2b) Why does your organization not consider itself exposed to water risks in its direct operations with the potential to have a substantive financial or strategic impact?

|     | Primary       | Please explain                                                                                                                          |
|-----|---------------|-----------------------------------------------------------------------------------------------------------------------------------------|
|     | reason        |                                                                                                                                         |
| Row | Evaluation in | As this is our first year as a separate independent company, we are still in the process of refining our sustainability strategy and    |
| 1   |               | programs. Therefore, we have opted to respond to the minimum version of this year's CDP Water Security questionnaire. We plan to        |
|     |               | respond to the full questionnaire in 2023. For more information about Constellation's sustainability strategy, please see the inaugural |
|     |               | 2022 Constellation Sustainability Report at www.constellationenergy.com/csr.                                                            |



### W4.2c

(W4.2c) Why does your organization not consider itself exposed to water risks in its value chain (beyond direct operations) with the potential to have a substantive financial or strategic impact?

|     | Primary       | Please explain                                                                                                                          |
|-----|---------------|-----------------------------------------------------------------------------------------------------------------------------------------|
|     | reason        |                                                                                                                                         |
| Row | Evaluation in | As this is our first year as a separate independent company, we are still in the process of refining our sustainability strategy and    |
| 1   | progress      | programs. Therefore, we have opted to respond to the minimum version of this year's CDP Water Security questionnaire. We plan to        |
|     |               | respond to the full questionnaire in 2023. For more information about Constellation's sustainability strategy, please see the inaugural |
|     |               | 2022 Constellation Sustainability Report at www.constellationenergy.com/csr.                                                            |

### W4.3

(W4.3) Have you identified any water-related opportunities with the potential to have a substantive financial or strategic impact on your business?

No

#### W4.3b

(W4.3b) Why does your organization not consider itself to have water-related opportunities?

|          | Primary<br>reason | Please explain                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
|----------|-------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Row<br>1 | progress          | As this is our first year as a separate independent company, we are still in the process of refining our sustainability strategy and programs. Therefore, we have opted to respond to the minimum version of this year's CDP Water Security questionnaire. We plan to respond to the full questionnaire in 2023. For more information about Constellation's sustainability strategy, please see the inaugural 2022 Constellation Sustainability Report at www.constellationenergy.com/csr. |



# W6. Governance

### W6.1

#### (W6.1) Does your organization have a water policy?

Yes, we have a documented water policy that is publicly available

### W6.1a

#### (W6.1a) Select the options that best describe the scope and content of your water policy.

|          | Scope            | Content             | Please explain                                                                                                                                                                                                                           |
|----------|------------------|---------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Row<br>1 | Company-<br>wide | dependency on water | Constellation's Water Resources Management Policy is publicly available on our corporate website at:<br>https://www.constellationenergy.com/content/dam/constellationenergy/pdfs/Constellation-Water-Resource-<br>Management-Policy.pdf. |



### W6.2

(W6.2) Is there board level oversight of water-related issues within your organization?

Yes

### W6.2a

(W6.2a) Identify the position(s) (do not include any names) of the individual(s) on the board with responsibility for water-related issues.

| Position of individual | Please explain                                                                                                                                   |
|------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------|
| Board-level            | Our Board of Directors has ultimate responsibility for overseeing the company's management of environmental matters, including water. The        |
| committee              | Corporate Governance Committee of the Board of Directors oversees our environmental strategies, including climate and sustainability             |
|                        | policies. reviews the company's strategies and efforts to protect and improve the quality of the environment, including, but not limited to, the |
|                        | company's climate change and sustainability policies and programs, and any material company disclosures on these matters.                        |

### W6.2b

#### (W6.2b) Provide further details on the board's oversight of water-related issues.

|          | Frequency that water-<br>related issues are a<br>scheduled agenda item | Governance mechanisms into which water-<br>related issues are integrated                                                                                                                                                                            | Please explain                                                                                                                                                                                                                                                                                                                                                                                                                                       |
|----------|------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Row<br>1 | Periodically and as                                                    | Overseeing major capital expenditures<br>Reviewing and guiding risk management policies<br>Reviewing and guiding strategy<br>Other, please specify<br>Regular reporting to the board by management<br>of monitoring implementation and performance; | Constellation is subject to comprehensive and complex environmental<br>statutes and regulations at the federal, state and local levels, including<br>requirements relating to water quality, impacts on species and habitat,<br>solid and hazardous waste and air emissions. Our Board of Directors<br>reviews the management of environmental matters. Our executive team,<br>including the CEO and other senior management, is accountable for our |



| related regulations | environmental compliance and our compliance assurance strategy. The<br>performance of individuals directly involved in environmental compliance<br>affects compensation as part of the annual individual performance<br>review process. The executive team is also in charge of ensuring<br>compliance with various federal and state regulatory requirements. The<br>executive team provides regular reports to the board regarding any<br>potential compliance issues with these regulations. |
|---------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|---------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

### W6.2d

(W6.2d) Does your organization have at least one board member with competence on water-related issues?

|          | Board member(s) have<br>competence on water-<br>related issues | Criteria used to assess competence of board member(s) on water-related issues                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
|----------|----------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Row<br>1 | Yes                                                            | Our board consists of individuals who are competent in many areas, however none have specifically related to significant water-related issues, except for one board member that is a former retired Navy admiral. Our board functions at a high level in providing direction and oversight of management – many of which have direct and relevant experience in water-related matters. Due to the governance structure of our board of directors, the board receives and reviews material water related matters and is able to provide input and advise as necessary. |

### W6.3

(W6.3) Provide the highest management-level position(s) or committee(s) with responsibility for water-related issues (do not include the names of individuals).

Name of the position(s) and/or committee(s) Other, please specify Executive Committee Constellation Energy Group, Inc. CDP Water Security Questionnaire 2022 Thursday, September 29, 2022



#### Responsibility

Other, please specify

Both assessing and managing water-related risks and opportunities

#### Frequency of reporting to the board on water-related issues

As important matters arise

#### Please explain

Constellation is subject to comprehensive and complex environmental statutes and regulations at the federal, state and local levels, including requirements relating to water quality, impacts on species and habitat, solid and hazardous waste and air emissions. Our Board of Directors has oversight of the management of environmental matters. Our executive team, including the CEO and other senior management, is ultimately accountable for our environmental compliance and our compliance assurance strategy.

#### W6.4

#### (W6.4) Do you provide incentives to C-suite employees or board members for the management of water-related issues?

|   |     | Provide incentives for<br>management of water-<br>related issues | Comment                                                                                                                 |
|---|-----|------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------|
| F | Row | No, not currently but we plan                                    | Constellation is subject to comprehensive and complex environmental statutes and regulations at the federal, state      |
| - | 1   | to introduce them in the next                                    | and local levels, including requirements relating to water quality, impacts on species and habitat, solid and hazardous |
|   |     | two years                                                        | waste and air emissions The performance of individuals directly involved in environmental compliance affects            |
|   |     |                                                                  | compensation as part of the annual individual performance review process.                                               |

#### W6.5

# (W6.5) Do you engage in activities that could either directly or indirectly influence public policy on water through any of the following?

Yes, direct engagement with policy makers

Yes, trade associations

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Yes, funding research organizations Yes, other

### W6.5a

(W6.5a) What processes do you have in place to ensure that all of your direct and indirect activities seeking to influence policy are consistent with your water policy/water commitments?

As this is our first year as an independent company, we are still in the process of refining our sustainability strategy and programs, including our public policy advocacy. Therefore, we have opted to respond to the minimum version of this year's CDP Climate Change questionnaire. We plan to provide a more detailed response in 2023.

### W6.6

(W6.6) Did your organization include information about its response to water-related risks in its most recent mainstream financial report?

Yes (you may attach the report - this is optional)

# W7. Business strategy

### W7.1

(W7.1) Are water-related issues integrated into any aspects of your long-term strategic business plan, and if so how?

| Are water-related | Long-term    | Please explain |
|-------------------|--------------|----------------|
| issues            | time horizon |                |
| integrated?       | (years)      |                |



| Long-term<br>business<br>objectives                | Yes, water-related<br>issues are<br>integrated | We identify and assess relevant near and long-term water issues in support of strategic planning, risk management, capital expenditures and business planning, including consideration of geographic water stressed regions, with a focus on ensuring the availability of water and its effective use. We also consider different climate change related conditions, including temperature, precipitation, storm frequency and intensity trends and sea level rise projections into our business planning and risk assessment processes. We review flood risk for all critical substations and assess the implications, at a high-level, of worst-case conditions.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
|----------------------------------------------------|------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Strategy for<br>achieving long-<br>term objectives | Yes, water-related<br>issues are<br>integrated | We integrate water resource considerations into the life-cycle of operations, products and services (i.e., design, supply chain, operations, customer interfaces, maintenance and de-commissioning) to avoid, mitigate or improve water use impacts. We establish annual performance targets and long-term water management goals at an operating company level to drive performance improvement in areas including water availability, water use, water quality and protection of aquatic species and habitats. We annually track and publicly report on water availability/use and relevant issues internally and externally. We employ Best Management Practices (BMP) and standards to improve life-cycle water use and water quality and to reduce the risk of adverse impacts on operations and the environment. We raise the awareness of employees, suppliers and other key stakeholders of the strategic importance of water and the need for effective water use management to sustain operations, communities and the ecosystem. We also advocate on water and energy public policy issues based on sound science, competitive markets and universal safe drinking water and sanitation. |
| Financial<br>planning                              | Yes, water-related<br>issues are<br>integrated | Constellation regularly completes risk assessments to identify and focus on the top risks facing our company, including water-related aspects. Our assessment framework looks at strategic, financial, operational, regulatory/compliance and reputational risks and is being automated for improved intelligence and risk analytics. Additionally, Constellation employs various market, credit, liquidity and operational risk assessment tools to identify financial and business risk exposures that are evaluated by risk management committees at the corporate level and within each business unit.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |



### W7.2

(W7.2) What is the trend in your organization's water-related capital expenditure (CAPEX) and operating expenditure (OPEX) for the reporting year, and the anticipated trend for the next reporting year?

Row 1

Water-related CAPEX (+/- % change)

Anticipated forward trend for CAPEX (+/- % change)

Water-related OPEX (+/- % change)

Anticipated forward trend for OPEX (+/- % change)

#### **Please explain**

As this is our first year as an independent company, we are still in the process of refining our sustainability strategy and programs. Therefore, we have opted to respond to the minimum version of this year's CDP Water Security questionnaire. We plan to provide a more detailed response in 2023.

#### W7.3

#### (W7.3) Does your organization use scenario analysis to inform its business strategy?

| Use of scenario | Comment |
|-----------------|---------|
| analysis        |         |



| Row | No, but we anticipate    | As this is our first year as an independent company, we are still in the process of refining our sustainability strategy and                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
|-----|--------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1   | doing so within the next | programs. Therefore, we have opted to respond to the minimum version of this year's CDP Water Security questionnaire.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
|     | two years                | We plan to provide a more detailed response in 2023.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
|     |                          | Constellation is continually analyzing market conditions, regulatory developments, and new technologies in order to best position itself. Constellation maintains a Corporate Strategy organization that analyzes market trends, key risk indicators, and anticipated developments in the market to retain its role as an industry leader. This includes coordination of cross-company analysis on emerging technologies that may be associated with climate change action, potential risks associated with various future scenarios and identification of key signposts that might indicate changes in market signals, which can help influence and inform other areas of the company. |

## W7.4

#### (W7.4) Does your company use an internal price on water?

Row 1

#### Does your company use an internal price on water?

No, and we do not anticipate doing so within the next two years

#### Please explain

At the present time weighing the most significant risk factors including increased water stress and scarcity, flooding, drought, and the related potential of climate change, we are not currently using an internal price on water.

#### W7.5

#### (W7.5) Do you classify any of your current products and/or services as low water impact?

| Products and/or serv | vices classified as low | Primary reason for not classifying any of your current products and/or | Please  |
|----------------------|-------------------------|------------------------------------------------------------------------|---------|
| water impact         |                         | services as low water impact                                           | explain |



| Row | No, and we do not plan to address this within the |  |
|-----|---------------------------------------------------|--|
| 1   | next two years                                    |  |

# W8. Targets

### W8.1

(W8.1) Describe your approach to setting and monitoring water-related targets and/or goals.

|          | Levels for<br>targets and/or<br>goals              | Monitoring at corporate level               | Approach to setting and monitoring targets and/or goals                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
|----------|----------------------------------------------------|---------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Row<br>1 | Business level<br>specific targets<br>and/or goals | None are<br>monitored at<br>corporate level | The Constellation Water Policy commits the company to operating its businesses in a socially responsible, sustainable manner, which includes the preservation and protection of water resources. Our policy supports this effort by establishing annual and long-term water management goals. We set annual goals regarding reportable releases and permit non-compliance violations, which drives protection of water resources, and performance against those goals is measured and reported through our annual Constellation Sustainability Report, located at www.constellationenergy.com/csr. |

# **W9. Verification**

#### **W9.1**

(W9.1) Do you verify any other water information reported in your CDP disclosure (not already covered by W5.1a)? Yes



# W9.1a

#### (W9.1a) Which data points within your CDP disclosure have been verified, and which standards were used?

| Disclosure<br>module | Data verified                                                                                                                                                                                                                                              | Verification standard                                                                                | Please explain                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
|----------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| W1 Current<br>state  | Applicable withdrawals and discharges are<br>monitored for both quantity and quality. This<br>includes cooling water intakes and<br>discharges, treated wastewater discharges,<br>storm water and various industrial or<br>construction related activities | Other, please specify<br>USEPA NPDES<br>System, US DOE EIA<br>Reporting<br>Requirements (Fm.<br>923) | The CWA's National Pollutant Discharge Elimination System<br>(NPDES) Program regulates point sources that discharge<br>pollutants into waters of the United States. Compliance monitoring<br>under the NPDES Program encompasses a range of techniques,<br>from Discharge Monitoring Report reviews, to on-site compliance<br>evaluation as well as providing assistance to enhance compliance<br>with NPDES permits. The objective is to address the most<br>significant problems and to promote compliance Inspection Manual<br>provides information on how compliance inspections are<br>conducted. Form EIA-923 collects information on the operation of<br>electric power plants and combined heat and power (CHP) plants in<br>the United States. Data collected on this form includes electric<br>power generation operational cooling water data. These data are<br>used to monitor the status and trends of the electric power industry<br>and appear in U.S. Energy Information Administration (EIA)<br>publications and public databases. |



# W10. Sign off

#### W-FI

(W-FI) Use this field to provide any additional information or context that you feel is relevant to your organization's response. Please note that this field is optional and is not scored.

### W10.1

(W10.1) Provide details for the person that has signed off (approved) your CDP water response.

|       | Job title              | Corresponding job category |
|-------|------------------------|----------------------------|
| Row 1 | Chief Strategy Officer | Other C-Suite Officer      |

### W10.2

(W10.2) Please indicate whether your organization agrees for CDP to transfer your publicly disclosed data on your impact and risk response strategies to the CEO Water Mandate's Water Action Hub [applies only to W2.1a (response to impacts), W4.2 and W4.2a (response to risks)].

Yes