



NRG Energy, Inc.
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November 22, 2010

Mr. Jonathan Schrag
RGGI, Inc.
90 Church Street, 4th Floor
New York City, New York 10007

Sent via e-mail: info@rggi.org

Dear Mr. Schrag:

On behalf of NRG Energy, Inc. ("NRG"), the enclosed comments are submitted to RGGI, Inc. regarding the Regional Greenhouse Gas Initiative ("RGGI") Reference Case modeling presented on November 12, 2010. NRG is a leading wholesale power generation company, primarily engaged in the ownership and operation of power generation facilities and the sale of energy, capacity and related products in the United States. In the RGGI-applicable states, NRG owns over 7,000 MW of the installed fossil-fired generation. As such, we are a significant regional stakeholder.

In the attached document, NRG submits corrections to the assumptions used in the RGGI Reference Case modeling. NRG's corrections concentrate on certain assumptions used for generating units within the NRG fleet. NRG will submit in a separate document, its comments on the specific stakeholder questions presented at the meeting

If you have any questions or require additional information, please feel free to contact me at (860) 343-6962 or cynthia.karlic@nrgenergy.com

Respectfully submitted,

A handwritten signature in blue ink that reads "Cynthia L. Karlic". The signature is written in a cursive, flowing style.

Cynthia L. Karlic
Environmental Director – Northeast Region
NRG Energy, Inc.

Attachment

NRG ENERGY, INC.
CORRECTIONS TO RGGI REFERENCE CASE ASSUMPTIONS

NRG Energy, Inc (“NRG”) submits comments and corrections to the input assumptions used in the RGGI Reference Case modeling. These comments relate to generating sources owned by NRG as follows:

1. Dunkirk and CR Huntley Generating Stations in New York
2. Indian River Generating Station Units 3 and 4 in Delaware

a. Dunkirk Generating Station

Dunkirk Generating Station (“Dunkirk”) located in New York consists of four coal fired steam generating boilers, Units 1, 2, 3, and 4 (collectively, the “Dunkirk Units”). Dunkirk Units 1 and 2 each have a net capacity of 75 MW; Units 3 and 4 are each 190 MW units. All of the Dunkirk Units are equipped with Selective Non-catalytic Reduction (“SNCR”), Trona injection, activated carbon injection (“ACI”) and fabric filters for the control of particulate matter, NO_x, mercury, and SO₂. This equipment, with the exception of ACI, was installed to comply with annual limits for NO_x and SO₂ in New York Consent Decree No. 02-CV-00245 signed on January 11, 2005. The combination of Trona injection and SNCR will meet the Dunkirk Units’ annual NO_x and SO₂ commitments under the Consent Decree. The ACI equipment was installed to comply with the New York State Department of Environmental Conservation Mercury Rule – 6NYCRR Part 246. The RGGI assumption of SNCR in 2010 or 2011 is incorrect since this has already occurred for the Dunkirk Units. Also, an erroneous assumption was made that Flue Gas Desulfurization (“FGD”) systems would be installed in 2011 for Units 3 and 4. However, installation of FGD systems is not planned at Dunkirk.

b. CR Huntley Generating Station

CR Huntley Generating Station (“Huntley”) located in New York consists of two coal fired steam generating boilers, Units 67 and 68 (together, the “Huntley Units”). The Huntley Units each have a net capacity of 190 MW, are equipped with SNCR, Trona injection, ACI, and fabric filters for the control of particulate matter, NO_x, mercury, and SO₂. The equipment, with the exception of ACI, was installed to comply with annual limits for NO_x and SO₂ in New York Consent Decree No. 02-CV-00245 signed on January 11, 2005. The combination of Trona injection and SNCR will meet the Huntley Units’ annual NO_x and SO₂ commitments under the Consent Decree. The ACI equipment was installed to comply with the New York State Department of Environmental Conservation Mercury Rule – 6NYCRR Part 246. Like Dunkirk Units 3 and 4, the RGGI assumption that FGD systems would be installed in 2011 for the Huntley Units is incorrect. Installation of FGD is not planned at Huntley.

c. Indian River Generating Station Units 3 and 4

Effective May 1, 2011, Indian River Generating Station will operate only two units subject to RGGI: Units 3 and 4. Unit 3 is a load following coal fired unit with a net capacity of approximately 155 MW. In addition to activated carbon injection pollution control for mercury and an electrostatic precipitator for particulate, Unit 3 has Low NO_x Burners (“LNB”), Overfired Air (“OFA”), and SNCR for NO_x control, and utilizes low (1.2%) sulfur coal to minimize SO₂ emissions.

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Unit 4 is a load-following, coal fired-unit with a net capacity of approximately 410 MW. By January 1, 2012, Unit 4 will operate with an SCR and circulating dry scrubber as well as mercury and particulate controls similar to Unit 3. The RGGI assumption of LSD in 2012 for this unit is incorrect.

The Delaware Department of Natural Resources and Environmental Control (“DNREC”) and NRG signed a Consent Order on July 16, 2010 for the retirement of Units 1, 2, and 3 by May 1, 2011, May 1, 2010, and January 1, 2014, respectively. The RGGI assumption of ACI would be installed on Unit 3 in 2011 is incorrect, because Unit 3 already is equipped with this technology.