

Comment from NRG Energy Inc on the Status of the Dunkirk Units for IPM Modeling

NRG Energy, Inc. (“NRG”) submits this comment on RGGI Inc’s IPM Reference Case modeling assumptions as presented during the August 13, 2012 Webinar. In the presentation, NRG’s Dunkirk Station Units 1, 2, 3, and 4 were listed as retired in 2012. These units have not been retired.

On March 14, 2012, NRG filed a notice with the New York Public Service Commission (“PSC”) of its intention to mothball Units 1, 2, 3, and 4 (“Units”) at its Dunkirk Station as of September 11, 2012. Mothballing will not be a permanent retirement of the Units but rather a temporary lay-up that will allow for the return to service of the units based on economic factors.

National Grid, the transmission owner interconnected to the Dunkirk units, later determined that Unit 1 and 2 are need for local reliability until at least May 31, 2013. On August 17, 2012, the PSC approved a binding Term Sheet and ordered National Grid to file, by August 27, 2012, a full agreement with NRG based on the Term Sheet to insure that Units 1 and 2 to remain in service through May 31, 2013.

For this reason, NRG requests that RGGI Inc. correct its references and information regarding the Dunkirk units to reflect that Units 1 and 2 will remain in service through May 31, 2013 and that Units 3 and 4 are mothballed. NRG is not however, asking for the Reference Case modeling to be re-performed because NRG believes that any impact this correction would have on the presented modeling results would be insignificant.

If you have any questions or require additional information, please contact Ms. Cynthia L. Karlic, Regional Environmental Director, at cynthia.karlic@nrgenergy.com or (860) 343-6962.