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PROJECT NO. 53385

**PROJECT TO SUBMIT EMERGENCY § PUBLIC UTILITY COMMISSION
OPERATIONS PLANS AND RELATED §
DOCUMENTS UNDER 16 TAC § 25.53 § OF TEXAS**

**2023 ANNUAL REVIEW STATEMENT FOR THE ELECTRIC SERVICE
EMERGENCY OPERATIONS PLAN (ESEOP) OF NRG SOUTH TEXAS LP**

COMES NOW NRG South Texas LP (NRG SO TX), PGC Certificate No. 20147, by and through its operating company, South Texas Project Nuclear Operating Company (STPNOC), and submits this 2023 Annual Review Statement in compliance with 16 Tex. Admin. Code §25.53 (c)(3)(B) for an entity that did not make a change to its EOP that materially affects how the entity would respond to an emergency.

NO CHANGES TO LIST OF PRIMARY/BACKUP EMERGENCY CONTACTS

Pursuant to §25.53 (c)(3)(B)(i) requiring the entry of a pleading that documents any changes to the list of emergency contacts who can immediately address urgent requests and questions from the Commission during an emergency, NRG SO TX hereby confirm that no changes have been made to the List of Primary/Backup Emergency Contacts previously submitted under the *Electric Service Emergency Operations Plan, Executive Summary, and Affidavits* filed in this docket on April 14, 2022, Item 56.

ATTESTATION AND AFFIDAVIT

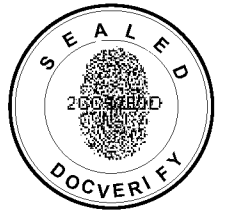
In accordance with §25.53 (c)(3)(B)(iii), an Affidavit from NRG SO TX's highest-ranking representative, official, or officer with binding authority over NRG SO TX, as described under §25.53 (c)(4)(C) is attached hereto as ATTACHMENT A.

In accordance with §25.53 (c)(3)(B)(ii), an Attestation from NRG SO TX's highest-ranking representative, official, or officer with binding authority over NRG SO TX stating that there have been no changes made to the *Electric Service Emergency Operations Plan, Executive Summary, and Affidavits* (filed in this docket on April 14, 2022, Item 56) that materially affects how the entity would respond to an emergency is included as Item 4 of ATTACHMENT A.

Respectfully submitted,

Jennifer S. Hsia

Jennifer Hsia
Managing Senior Counsel
NRG Energy, Inc.
910 Louisiana St.
Houston, TX 77002
(713) 537-3292
jennifer.hsia@nrg.com



2023.03.10 Pistner Affidavit STP - 25.53 - 3.8.2023 v2 signed notarized.pdf

DocVerify ID: 2CC3280D-04F0-4AF6-AD2D-96BB497CDD8A
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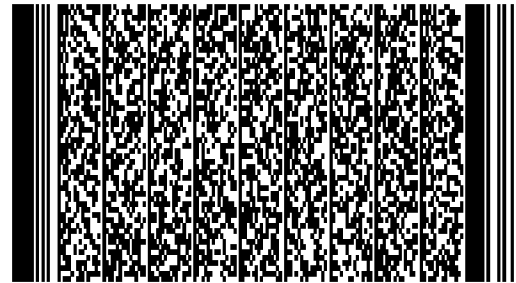
E-Signature Summary

E-Signature 1: Matthew J Pistner (MJP)

March 13, 2023 15:09:02 -6:00 [3D570B7C7DBA] [75.26.205.56]
 matthew.pistner@nrg.com (Principal)

E-Signature Notary: Elizabeth Wolford (EW)

March 13, 2023 15:09:02 -6:00 [BED5D7D2027F] [75.26.205.56]
 liz.wolford@nrg.com
 I, Elizabeth Wolford, did witness the participants named above electronically sign this document.



ATTACHMENT A

AFFIDAVIT AND ATTESTATION OF MATTHEW PISTNER

STATE OF TEXAS §
 §
COUNTY OF HARRIS §

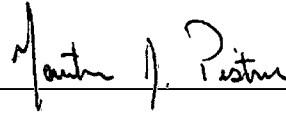
BEFORE ME, the undersigned authority, on this day personally appeared Matthew Pistner who, being duly sworn deposed and stated as follows:

1. My name is Matthew Pistner. My business address is 910 Louisiana Street, Houston, Texas, 77002. I am over eighteen (18) years of age. I have personal knowledge of the facts contained herein, and to the best of my knowledge, they are true and correct.
2. I am currently employed as a Senior Vice President, Generation with NRG Energy, Inc. (NRG). NRG South Texas LP¹ ("NRG SO TX"), being PGC Certificate No. 20147, is a Power Generation Company (PGC) and a subsidiary of NRG. I am authorized to make this affidavit on behalf of NRG SO TX as its President.
3. NRG South Texas LP, by and through its operating company, South Texas Project Nuclear Operating Company (STPNOC), filed the Executive Summary and redacted Electric Service Emergency Operations Plan (ESEOP) on April 14, 2022, in Project No. 53385, Item 56. On the same day, it submitted the required non-redacted ESEOP to the Electric Reliability Council of Texas.
4. I hereby attest that no changes were made to the ESEOP that materially affect how NRG SO TX would respond to an emergency.
5. On behalf of NRG SO TX, I affirm the following:
 - i. All relevant operating personnel responsible for the critical operation of South Texas Project Electric Generating Station are familiar with, and have received training, on the applicable contents and execution of the ESEOP and plant specific documents, and are committed to following the plans and the provisions contained therein in the event of a system-wide or local emergency that arises from natural or manmade disasters, except to the extent deviations are appropriate as a result of specific circumstances in the course of an emergency.
 - ii. The ESEOP has been reviewed and approved by the appropriate executives.

¹ NRG South Texas LP is 44% owner and is the Master Qualifying Scheduling Entity (QSE) for the South Texas Project Energy Generation Station (STPEGS) with the other two owners being CPS Energy (40%) and the City of Austin d/b/a Austin Energy (16%).

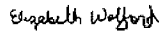


- iii. NRG SO TX will comply with the requirements for drills contained within the Commission's Emergency Operations Plan rule, subsection (f). In 2022, drills were conducted, and NRG SO TX activated emergency procedures for a hurricane. For 2023, drills are currently planned. NRG SO TX will comply with the requirement for PGCs to provide notification 30 days prior to a drill.
- iv. The ESEOP or a summary will be distributed to local jurisdictions if deemed necessary.
- v. NRG maintains business continuity plans that cover our corporate functions and retail operations. These documents outline our plans to return to normal operations after a disruption caused by an incident.
- vi. All relevant emergency management personnel who are designated to interact with emergency management officials during emergency events have completed the latest IS-100, IS-200, IS-700, and IS-800 National Incident Management System Training.



Matthew Pistner
Senior Vice President, Generation
NRG Energy, Inc., and President of NRG
South Texas LP

SUBSCRIBED AND SWORN TO BEFORE ME on the 10th day of March, 2023
to certify which witness my official hand and seal of office.



Signed on 2023/03/13 15:09:02 -6:00

Notary Public in and for the
State of Texas

My Commission Expires:

