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PROJECT NO. 53385

PROJECT TO SUBMIT EMERGENCY OPERATIONS PLANS AND RELATED DOCUMENTS UNDER 16 TAC § 25.53	§ § §	PUBLIC UTILITY COMMISSION OF TEXAS
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2024 ANNUAL REVIEW STATEMENT FOR THE JOINT EMERGENCY
OPERATIONS PLAN OF THE NRG POWER GENERATION COMPANIES

COMES NOW the NRG Energy, Inc. (NRG) owned Power Generation Companies listed below (NRG PGCs) and, collectively, submit this 2024 Annual Review Statement in compliance with 16 TAC § 25.53(3)(B) for an entity that did not make a change to its Joint Emergency Operations Plan (EOP) that materially affects how the entity would respond to an emergency.

• NRG Cedar Bayou Development Company, LLC (PGC Certificate No. 20237)
• NRG Cottonwood Tenant LLC (PGC Certificate No. 20537)
• NRG Texas Power LLC (PGC Certificate No. 20184)

In addition, Gregory Power Partners LLC (PGC Certificate No. 20010), submits its 2024 Annual Review Statement in compliance with 16 TAC § 25.53(3)(B) for an entity that did not make a change to its Joint Emergency Operations Plan (EOP) that materially affects how the entity would respond to an emergency.

GREGORY POWER PARTNERS LLC

Prior to October 2, 2023, Gregory Power Partners LLC (“Gregory”) was a direct wholly owned subsidiary of NRG Texas Gregory LLC. As a result of a transaction consummated on October 2, 2023, Gregory became a direct wholly owned subsidiary of Gregory Power Holdings, LLC (“Gregory Holdings”), an indirect subsidiary of Cheniere Energy, Inc. (“Cheniere”). Following a transaction consummated on December 29, 2023, an affiliate of Cheniere and an affiliate of Calpine Corporation (“Calpine”) formed a joint venture, by such Calpine affiliate becoming a member of Gregory Holdings. As a result of the transaction, Calpine now indirectly holds a minority interest in Gregory and Cheniere indirectly holds the remaining majority interest in Gregory.

Gregory Holdings and NRG Energy, Inc. (indirect parent of NRG Texas Gregory LLC) entered into an agreement whereby NRG Texas Gregory LLC agreed to operate and maintain the Gregory Power Plant facility for a specified term (the “Transition Services Agreement”), which ends after the March 15 EOP annual submission deadline and, therefore, Gregory will operate under NRG’s Joint PGC’s EOP (“Joint EOP”) through March 15, 2024 and until the termination of the Transition Services Agreement on March 27, 2024. Following the termination of the agreement between Gregory Holdings and NRG Energy Inc., a new Emergency Operations Plan will be submitted for Gregory in accordance with 16 TAC § 25.53.

NO CHANGES TO LIST OF PRIMARY/BACKUP EMERGENCY CONTACTS

Pursuant to § 25.53(3)(B)(i) requiring the entry of a pleading that documents any change to the list of emergency contacts who can immediately address urgent requests and questions from the Commission during an emergency, the NRG PGCs hereby confirm that no changes have been made to the List of Primary/Backup Emergency Contacts previously submitted under the *NRG Energy, Inc.’s PGC’s Executive Summary, Affidavits and Joint EOP* filed in this docket on April 14, 2022, Items 70 and 71.

UPDATE TO RECORD OF DISTRIBUTION ACCESS TO AND TRAINING ON JOINT EOP

The record of distribution of persons receiving access to and training on the Joint EOP has changed. Outlined on the attached Exhibit B is an updated record (in table format) containing the titles and names of persons who have received access to and training on the Joint EOP, as well as the date(s) of access to the relevant portions of the Joint EOP.

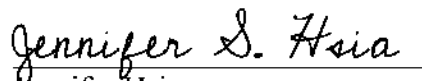
ATTESTATION AND AFFIDAVIT

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

In accordance with § 25.53(3)(B)(ii), an Attestation from the NRG PGCs highest-ranking representative, official, or officer with binding authority over the NRG PGCs stating that there have been no changes made to the *Joint Emergency Operations Plan for NRG Energy, Inc. Power*

Generation Companies (filed in this Project on April 14, 2022, Items 70 and 71) that materially affects how the entity would respond to an emergency is included as Item 5 of Attachment A.

Respectfully submitted,



Jennifer Hsia

Managing Senior Counsel

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ATTACHMENT A

ATTESTATION AND AFFIDAVIT OF MATTHEW J PISTNER

STATE OF TEXAS §
 §
COUNTY OF HARRIS §

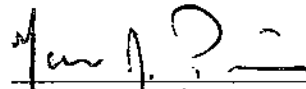
BEFORE ME, the undersigned authority, on this day personally appeared Matthew J Pistner who, being duly sworn, deposed, and stated as follows:

1. My name is Matthew J 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 Cedar Bayou Development Company, LLC, (Certificate No. 20237), NRG Cottonwood Tenant LLC (Certificate No. 20537), and NRG Texas Power LLC (Certificate No. 20184), are Power Generation Companies (PGCs) and subsidiaries of NRG.
3. The above-listed PGCs are collectively the NRG Energy, Inc.'s NRG PGCs.
4. The above listed NRG PGCs filed the Executive Summary, Affidavits, and redacted Joint Emergency Operations Plan (Joint EOP) for NRG PGCs (Joint EOP) on April 14, 2022, in this Project, Items 70 and 71¹. On the same day, NRG PGCs submitted the required non-redacted Joint EOP to the Electric Reliability Council of Texas.
5. I hereby attest that no changes were made to the Joint EOP that materially affects how NRG PGCs would respond to an emergency.
6. On behalf of NRG Cedar Bayou Development Company, LLC, NRG Cottonwood Tenant LLC, NRG Texas Power LLC, and Gregory Power Partners LLC² I affirm the following:

¹ The NRG PGCs Joint EOP filed on April 14, 2022, included Petra Nova Power I LLC and Gregory Power Partners LLC. Note that NRG no longer owns Petra Nova Power I LLC and Gregory Power Partners LLC.

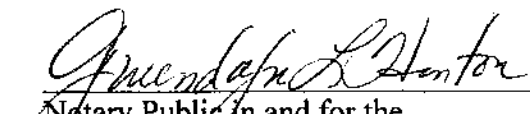
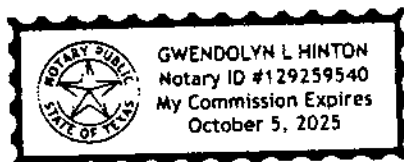
² As noted above, Gregory Holdings and NRG Energy Inc. (indirect parent of NRG Texas Gregory LLC) entered into an agreement whereby NRG Texas Gregory LLC agreed to operate and maintain the Gregory Power Plant facility for a specified term (the "Transition Services Agreement"), which ends after the March 15 EOP annual submission deadline and, therefore, Gregory will operate under NRG's Joint PGC's EOP ("Joint EOP") through March 15, 2024 and until the termination of the Transition Services Agreement on March 27, 2024. Following the termination of the agreement between Gregory Holdings and NRG Energy Inc., a new Emergency Operations Plan will be submitted for Gregory in accordance with 16 TAC § 25.53.

- i. Relevant operating personnel are familiar with and have received training on the applicable contents and execution of the Joint EOP. Such personnel are instructed to follow the applicable portions of the Joint EOP except to the extent deviations are appropriate as a result of specific circumstances in the course of an emergency.
- ii. The Joint EOP has been reviewed and approved by the appropriate executives.
- iii. NRG PGCs comply with the requirements for drills contained within the Commission's Emergency Operations Plan rule, Subsection (f). In 2023, drills were conducted, and NRG PGCs activated emergency procedures for a hurricane. For 2024, drills are currently being planned. NRG PGCs will comply with the requirement for PGCs to provide notification thirty days prior to a drill.
- iv. The Joint EOP, or a summary, will be distributed to local jurisdictions if deemed necessary.
- v. NRG maintains business continuity plans that cover our corporate functions and wholesale operations. These documents outline our plans to return to normal operations after a disruption caused by an incident.
- vi. The relevant emergency management personnel who are designated to interact with emergency management officials during emergency events have received the latest IS-100, IS-200, IS-700, and IS-800 National Incident Management System Training.



Matthew J. Pistner
Senior Vice President, Generation
NRG Energy, Inc., on behalf of NRG PGCs

SUBSCRIBED AND SWORN TO BEFORE ME on the 13th day of March 2024.



Notary Public in and for the
State of Texas

My Commission Expires:

OCTOBER 5, 2025

EXHIBIT B
UPDATED RECORD OF DISTRIBUTION AND TRAINING

Exhibit B is being submitted confidentially.