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NRG Energy Inc.
1005 Congress Avenue, Suite 950
Austin, Texas 78701

March 10, 2023

Public Utility Commission of Texas
Attn: Central Records
1701 N. Congress Avenue
P.O. Box 13326
Austin, Texas 78711-3326

RE: Project No. 53385, Project to Submit Emergency Operations Plans and Related Documents under 16 TAC § 25.53

To Whom It May Concern:

The following Retail Electric Providers submit this filing to comply 16 Tex. Admin. Code (TAC) § 25.53(c)(3)(B): Reliant Energy Retail Services, LLC (REP Certificate No. 10007), CPL Retail Energy LP (Certificate No. 10023), Direct Energy LP (Certificate No. 10040), Direct Energy Business LLC (Certificate No. 10011), First Choice Power LLC (Certificate No. 10008), Green Mountain Energy Company (Certificate No. 10009), NRG Controllable Load Services LLC (Certificate No. 10311), Stream SPE, Ltd. (Certificate No. 10104), US Retailers LLC (Certificate No. 10177), WTU Retail Energy LP (Certificate No. 10022), and XOOM Energy Texas, LLC (Certificate No. 10203) (collectively NRG Energy, Inc. REPs).

This filing includes:

1. Affidavits from Elizabeth Killinger and Scott Hart:
 - a. attesting that no changes were made to the EOP that materially affect how NRG REPs would respond to an emergency; and,
 - b. providing the affirmations required by 16 TAC § 25.53(c)(4)(C).
2. A pleading confirming NRG Energy, Inc. REPs' Emergency Contacts.

Should you have any questions regarding this filing, please contact at me at 512.691.6150.

Respectfully submitted,

A handwritten signature in black ink that reads "Lauren D. Damen". The signature is written in a cursive, flowing style.

Lauren D. Damen
Lauren.damen@nrg.com
Senior Counsel, NRG Energy, Inc.
State Bar No. 24078394
Attorney for NRG Energy, Inc. Retail Electric Providers

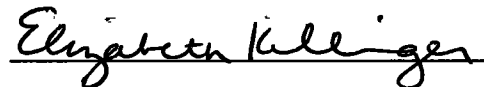
AFFIDAVIT OF ELIZABETH KILLINGER**STATE OF TEXAS****§****§****COUNTY OF HARRIS****§**

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

1. My name is Elizabeth Killinger. 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 Executive Vice President, NRG Home with NRG Energy, Inc. (NRG). Reliant Energy Retail Services, LLC (Certificate No. 10007) (Reliant), Direct Energy LP (Certificate No. 10040) (Direct Energy), Green Mountain Energy Company (Certificate No. 10009) (GMEC), Stream SPE, Ltd. (Certificate No. 10104) (Stream Energy), US Retailers LLC (Certificate No. 10177) (US Retailers), XOOM Energy Texas, LLC (Certificate No. 10203) (XOOM Energy), CPL Retail Energy LP (Certificate No. 10023) (CPL), First Choice Power LLC (Certificate No. 10008) (First Choice Power), and WTU Retail Energy LP (Certificate No. 10022) (WTU) are Retail Electric Providers (REPs) and subsidiaries of NRG. I am the President for each of these REPs. I am authorized to make this affidavit on their behalf.
3. The above listed REPs, and Direct Energy Business LLC (Certificate No. 10011) and NRG Controllable Load Services LLC (Certificate No. 10311), are collectively the NRG Energy, Inc. REPs or NRG REPs. A separate affidavit is being provided on behalf of Direct Energy Business LLC and NRG Controllable Load Services LLC.
4. The NRG REPs submitted the Executive Summary and redacted Joint Emergency Operations Plan for NRG Retail Electric Providers (EOP) on April 14, 2022 in Project No. 53385, Items 49 and 50. On the same day, NRG REPs submitted the non-redacted EOP to the Electric Reliability Council of Texas.
5. I hereby attest that no changes were made to the EOP that materially affect how the NRG REPs would respond to an emergency.
6. On behalf of Reliant, Direct Energy, GMEC, Stream Energy, US Retailers, XOOM Energy, CPL, First Choice Power, and WTU, I affirm the following:
 - i. Relevant operating personnel are familiar with, and have received training, on the applicable contents and execution of the EOP. Such personnel are

instructed to follow the applicable portions of the EOP except to the extent deviations are appropriate as a result of specific circumstances in the course of an emergency.

- ii. The EOP has been reviewed and approved by the appropriate executives.
- iii. NRG REPs comply with the requirements for drills contained within the Commission's Emergency Operations Plan rule, subsection (f). In 2022, drills were conducted, and NRG REPs activated emergency procedures for a hurricane. For 2023, drills are currently planned. NRG REPs will comply with the requirement for REPs to provide notification 30 days prior to a drill.
- iv. The 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 retail 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.



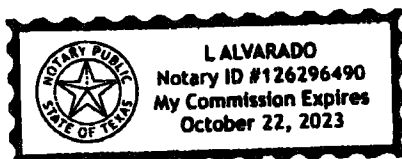
Elizabeth Killinger
Executive Vice President, NRG Home
NRG Energy, Inc.

SUBSCRIBED AND SWORN TO BEFORE ME on the 2nd day of March, 2023 to certify which witness my official hand and seal of office.



Notary Public in and for the
State of Texas

My Commission Expires:



AFFIDAVIT OF SCOTT HART

STATE OF TEXAS

§

COUNTY OF HARRIS

§

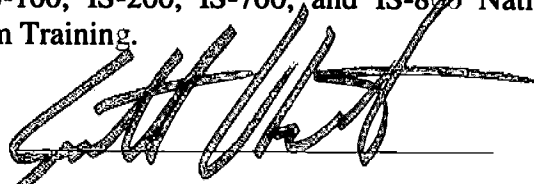
§

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

1. My name is Scott Hart. 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 SVP, NRG Business with NRG Energy, Inc. (NRG). Direct Energy Business LLC dba NRG Business¹ (Certificate No. 10011) (DEB) and NRG Controllable Load Services LLC (Certificate No. 10311) are Retail Electric Providers (REPs), and subsidiaries of NRG. I am the President for each of these REPs. I am authorized to make this affidavit on their behalf.
3. DEB and NRG Controllable Load Services LLC, along with CPL Retail Energy LP (Certificate No. 10023), Direct Energy LP (Certificate No. 10040), First Choice Power LLC (Certificate No. 10008), Green Mountain Energy Company (Certificate No. 10009), Reliant Energy Retail Services, LLC (Certificate No. 10007), Stream SPE, Ltd. (Certificate No. 10104), US Retailers LLC (Certificate No. 10177), WTU Retail Energy LP (Certificate No. 10022), and, XOOM Energy Texas, LLC (Certificate No. 10203), are collectively the NRG Energy, Inc. REPs or NRG REPs. A separate affidavit is being provided on behalf of the NRG REPs other than DEB and NRG Controllable Load Services.
4. The NRG REPs submitted the Executive Summary and redacted Joint Emergency Operations Plan for NRG Retail Electric Providers (EOP) on April 14, 2022 in Project No. 53385, Items 49 and 50. On the same day, NRG REPs submitted the non-redacted EOP to the Electric Reliability Council of Texas. While this was prior to NRG Controllable Load Services being certificated in August 2022, when NRG Controllable Load Services became certificated, it was immediately subject to the same documents and procedures described within those documents, including the same emergency contacts as DEB.
5. I hereby attest that no changes were made to the EOP that materially affect how the NRG REPs would respond to an emergency.

¹ The dbas of Direct Energy Business are NRG, NRG Business, CPL Business, WTU Business, and Expert Energy.

6. On behalf of DEB and NRG Controllable Load Services, I affirm the following:
- i. Relevant operating personnel are familiar with, and have received training, on the applicable contents and execution of the EOP. Such personnel are instructed to follow the applicable portions of the EOP except to the extent deviations are appropriate as a result of specific circumstances in the course of an emergency.
 - ii. The EOP has been reviewed and approved by the appropriate executives.
 - iii. NRG REPs comply with the requirements for drills contained within the Commission's Emergency Operations Plan rule, subsection (f). In 2022, drills were conducted, and NRG REPs activated emergency procedures for a hurricane. For 2023, drills are currently planned. NRG REPs will comply with the requirement for REPs to provide notification 30 days prior to a drill.
 - iv. The 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 retail 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.



Scott Hart
SVP, NRG Business
NRG Energy, Inc.

SUBSCRIBED AND SWORN TO BEFORE ME on the 8 day of March, 2023 to certify which witness my official hand and seal of office.



Notary Public in and for the
State of Texas

My Commission Expires: 07/20/25



PROJECT NO. 53385

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

EMERGENCY CONTACT INFORMATION FOR NRG REPS

Pursuant to 16 Tex. Admin. Code § 25.53(c)(3)(B)(i), the following Retail Electric Providers (REP) submit this pleading confirming Emergency Contacts: Reliant Energy Retail Services, LLC (Certificate No. 10007) (Reliant), Direct Energy LP (Certificate No. 10040) (Direct Energy), Green Mountain Energy Company (Certificate No. 10009) (GMEC), Stream SPE, Ltd. (Certificate No. 10104) (Stream Energy), US Retailers LLC (Certificate No. 10177) (US Retailers), XOOM Energy Texas, LLC (Certificate No. 10203) (XOOM Energy), CPL Retail Energy LP (Certificate No. 10023) (CPL), First Choice Power LLC (Certificate No. 10008) (First Choice Power), WTU Retail Energy LP (Certificate No. 10022) (WTU), Direct Energy Business LLC (Certificate No. 10011), and NRG Controllable Load Services LLC (Certificate No. 10311) (Collectively NRG Energy, Inc. REPS or NRG REPs).

The Emergency Contacts for NRG REPs remain the same as those filed in 2022. All primary and backup emergency contacts for NRG REPs are restated in the confidential attachment.

Respectfully submitted,



Lauren D. Damen
 Senior Counsel
 State Bar No. 24078394
 NRG Energy, Inc.
 1005 Congress Ave., Suite 950
 Austin, Texas 78701
 Telephone: (512) 691-6150
 Email: lauren.damen@nrg.com

ATTORNEY FOR NRG REPS

[Attachment Provided Confidentially]