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**INVESTIGATION OF EMERGENCY § PUBLIC UTILITY COMMISSION
PREPAREDNESS AND RESPONSE BY §
UTILITIES IN HOUSTON AND § OF TEXAS
SURROUNDING COMMUNITIES §**

**NRG ENERGY, INC.'S RESPONSE TO COMMISSION STAFF'S FIRST REQUEST
FOR INFORMATION TO POWER GENERATION COMPANIES**

NRG Energy, Inc. (NRG), on behalf of its power generation company (PGC) subsidiaries, provides the following responses to Staff's First Request for Information to Power Generation Companies related to the May 2024 Derecho event and Hurricane Beryl. NRG appreciates the opportunity to provide information and feedback regarding its experiences during both events and its recommendations for improvements going forward.

I. RESPONSES TO STAFF REQUESTS FOR INFORMATION

PGC 1-1 Please provide the company name, contact information, PGC registration number associated with the PGC responding to this request.

Response: NRG Energy, Inc. (NRG) provides responses to the Requests for Information (RFIs) below for the following PGCs: NRG Cedar Bayou Development Company, LLC (20237), NRG Cottonwood Tenant LLC (20537), and NRG Texas Power LLC¹ (20184). If the Staff has any follow-up questions related to the responses provided below, please contact Bill Barnes, Senior Director of Regulatory Affairs: 1005 Congress Avenue, Suite 950, Austin, Texas 78701, Office Phone: 512-691-6137, bill.barnes@nrg.com.

PGC 1-2 Please provide a list of generation facilities in Impacted Area, including their fuel type (e.g., natural gas, coal, wind, solar), county location, and generation capacity, expressed as the summer net seasonal maximum capacity in megawatts of each resource in the facility.

Response: See the table below for the list of NRG's PGCs' generation facilities in the Impacted Area.

¹ Including DBA's NRG Texas LP and Texas Genco II LP.

Generation Facility	Fuel Type	County	Generation Capacity (MW)
Cedar Bayou 1	Natural Gas	Chambers	745
Cedar Bayou 2	Natural Gas	Chambers	749
Cedar Bayou 4	Natural Gas	Chambers	252 ²
Cottonwood	Natural Gas	Newton	1,166
Greens Bayou	Natural Gas	Harris	327
Limestone	Coal	Limestone	1,660
San Jacinto	Natural Gas	Harris	160
T. H. Wharton	Natural Gas	Harris	1,002
W. A. Parish	Coal	Fort Bend	2,514
W. A. Parish	Natural Gas	Fort Bend	1,118

PGC 1-3 Were any of the PGC’s generation facilities forced offline or derated due to an outage on the transmission or distribution systems? If yes, please provide the total amount of megawatts forced offline or derated due to these outages.

Response: NRG’s PGCs’ generation facilities were not impacted by outages on the transmission or distribution system during either Derecho or Hurricane Beryl and had exceptional performance with 97% availability on average during both storms.

PGC 1-4 Please provide a timeline of the PGC’s response to the May 2024 Derecho and Hurricane Beryl, including the onset and duration of any outages, and the steps taken to restore operations.

Response: As noted in response to PGC 1-3, NRG’s PGCs’ generation facilities had exceptional availability (i.e., 97%) on average during both storms and were not impacted by outages on the transmission and distribution system during either storm. Thus, NRG does not have a specific timeline to provide for Derecho or Hurricane Beryl relating to the onset, duration, or restoration of outages for its PGCs’ generation facilities. Instead, NRG details the overarching timeline applicable to its PGCs’ preparation for hurricanes, both in advance of and during the season, as well as immediately before, during, and after a particular storm.

² NRG Cedar Bayou Development Company, LLC owns 50 percent (or 252 MW) of this unit, but operates all 504 MW of the unit.

More specifically, NRG's hurricane preparedness measures for plants located within the ERCOT region are set forth in our hurricane readiness procedure, which is summarized below.

Pre-Hurricane Season Preparation Activities:

NRG's hurricane readiness preparations typically begin in January with the appointment of an internal Hurricane Readiness Coordinator to manage all of NRG hurricane readiness activities. NRG then conducts a combined Summer and Hurricane Preparation coordination call with all Generation Operations staff in the spring. During this call, lessons learned from previous hurricane seasons are reviewed and expectations are set for preparations and operations. By June 1st, each generation facility then implements their site-specific hurricane readiness procedures which includes training for plant personnel, staging of supply kits, ordering surplus critical supplies, and testing of satellite phones. Progress and completion of these tasks are monitored during bi-weekly calls facilitated by the Hurricane Readiness Coordinator.

Activities Leading up to a Potential Hurricane:

When a hurricane watch is issued by the National Weather Service, plant managers are notified to initiate their Hurricane Emergency Operations Plans as defined in their site-specific Hurricane Procedures. In preparation for Hurricane Beryl, NRG initiated emergency operations on July 6, 2024, and daily coordination calls with operations personnel were initiated. NRG's emergency operations procedures minimize risk to operations by deferring maintenance activities until after the emergency conditions have ended.

Regardless of the severity of the threat, NRG generation facilities prepare for the worst-case scenario. Site preparation includes the following:

- Ensuring chemical and fuel tanks are full;
- Verifying availability and functionality of communication devices (plant radios, cell phones, satellite phone, computers, and walkie-talkies in the event of loss of power);
- Surveying the site for loose debris (wood, metal, ladders, barrels, etc.) and storing or securing them properly;
- Tying down all gas cylinders;
- Securing all instrument cabinets; and
- Closing and securing doors and gate.

NRG's PGCs' generation facilities also ensure they are properly staffed for the duration of the event. All employees who are able to safely travel to the site are advised to be prepared for 7 days of lock-down.

While facilities are staffed for the duration of the event, if conditions warrant a complete evacuation, there are checklists and procedures to safely shut-down and secure the plant.

Storm and Post-Storm Activities:

Status reports are prepared and sent to senior management four times per day during Hurricane Emergency Operations.

When hurricane conditions have subsided, the decision to stand-down will be made by senior management. If safe to do so, on-site personnel will survey the plant and assess damage. The plant manager or their designee will report the status of each unit and estimated time for any repairs.

PGC 1-5 Please provide a description of any communications with ERCOT or the PGC's interconnecting transmission and distribution utility regarding the PGC's status during the storms.

Response: NRG's PGCs communicate regularly with ERCOT in the normal course of business as part of their operations of generation facilities, and this communication took place without issue during Derecho and Hurricane Beryl. ERCOT coordinates the dispatch of generation facilities and since there were no issues impacting the operations of our generation facilities on the transmission system, there was no need for NRG's PGCs to communicate with the interconnecting transmission and distribution utility during either storm.

PGC 1-6 Please provide a description of the PGC's communications and coordination with ERCOT, the PGC's interconnecting transmission and distribution utility, and other stakeholders during and in the aftermath of the May 2024 Derecho and Hurricane Beryl.

Response: NRG's PGCs communicate regularly with ERCOT in the normal course of business as part of their operations of generation facilities, and this communication took place without issue during Derecho and Hurricane Beryl. ERCOT coordinates the dispatch of generation facilities and since there were no issues impacting the operations of our generation facilities on the transmission system, there was no need for NRG's PGCs to communicate with the interconnecting transmission and distribution utility during either storm.

PGC 1-7 Please provide an assessment of the effectiveness of the communications and coordination addressed in PGC 1-6 and any recommendations for improvement.

Response: Since there were no issues impacting the operations of our generation facilities on the transmission system, there was no need for NRG's PGCs to communicate with the interconnecting transmission and distribution utility during either storm, and thus, we have no feedback to share for this question.

PGC 1-8 Please provide a description of any challenges in restoring operations that you encountered due to the May 2024 Derecho and Hurricane Beryl.

Response: NRG's PGCs did not experience any issues operating its generation facilities during Derecho or Hurricane Beryl. The transmission system did not have outages that impacted the availability or operations of NRG's PGC's generation facilities.

PGC 1-9 Please provide any recommendations for improving the resiliency of the bulk power system during events such as the May 2024 Derecho or Hurricane Beryl in the future.

Response: NRG recommends transmission and distribution utilities remain focused on their core business of ensuring a reliable and resilient transmission and distribution system to allow for delivery of electric service from generation facilities to customers including effective vegetation management programs and storm restoration activities. Similar to generation operations, weather events will occur that may impact operations; however, risks can be mitigated by maintaining appropriate inventories of spare equipment and necessary supplies, ensuring proper staffing in advance of and during events, improved coordination and dispatch of mutual assistance personnel, and increased communications with industry partners and the public. Lastly, NRG is disappointed to hear about threats to line workers and would support stronger protections to ensure front line workers can do their work without risks to their safety.

PGC 1-10 Please provide any additional information that may be helpful to this investigation.

Response: NRG does not have any further information to provide at this time.

II. CONCLUSION

NRG commends the Commission and Staff's efforts to holistically review and identify lessons learned from the experiences of different stakeholders (including PGCs) during the May 2024 Derecho storm and Hurricane Beryl. NRG appreciates the opportunity to participate in this

process and looks forward to working with the Commission and Staff to continue to improve the industry's response to the next storm.

Respectfully submitted,

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