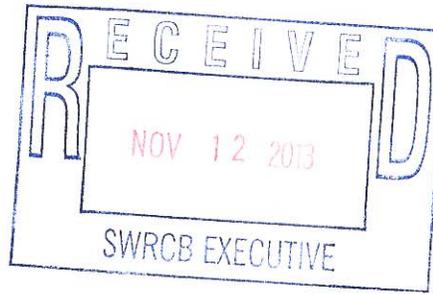


NRG Delta, LLC
696 W. 10th Street
P.O. Box 192
Pittsburg, CA 94565



DNQ

November 7, 2013

Mr. Thomas Howard
Executive Director
State Water Resources Board
Division of Water Quality, 15th Floor
1001 I Street
Sacramento, CA 95814

Re: Once-Through Cooling Policy Implementation Plan Update for Pittsburg Generating Station; Letter dated September 9, 2013

Dear Mr. Howard,

NRG Delta, LLC ("NRG"; previously known as GenOn Delta, LLC), owner of the Pittsburg Generating Station, submits this response to your letter of September 9, 2013, requesting updated information regarding compliance with the Statewide Water Quality Control Policy on the Use of Coastal and Estuarine Waters for Power Plant Cooling ("OTC Policy"). As a threshold matter, note that the Pittsburg Generating Station, and its compliance with the OTC Policy, is subject to ongoing confidential settlement negotiations between NRG and the Water Board in the pending case *GenOn West, LP, et al. v. State Water Resources Control Board* (Super. Ct. Sacramento County, Oct. 27, 2010, No. 2010-80000701) and that accordingly NRG cannot comment on certain matters related to the OTC Policy and its compliance plans. To the extent that they do not implicate specific matters that are subject to those ongoing settlement negotiations, NRG submits the responses below.

1. What mechanism is being used to bring this unit into compliance?

The Water Board statement accurately characterizes NRG's plans to comply with the OTC Policy at the Pittsburg Generating Station. NRG has not yet obtained a contract that would support the implementation of the retrofit project.

2. What actions have been taken to obtain permits, obtain contracts or meet other regulatory obligations to implement the compliance mechanism identified above?

As noted above, NRG has not yet obtained a contract that would support the implementation of the retrofit project. The projected schedule included on page 10 of the April 2011 Implementation Plan for the Pittsburg Generating Station remains accurate.

Mr. Thomas Howard
Executive Director, SWRCB
November 7, 2013
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3. What is the capacity of the repowered/replaced/retrofitted facility?

The existing capacity of Units 5 and 6 is 660 megawatts gross (MWg). The capacity of the planned retrofit project has not been finalized.

4. Are retirements covered by California Public Utilities Commission's (CPUC) authorized procurements?

NRG agrees with the Water Board's characterization of the California Independent System Operator's analysis of the Pittsburg sub-area, but NRG believes that there will be a continuing demand for generation from the Pittsburg Generating Station.

I anticipate the above information has addressed the SWRCB's questions regarding Pittsburg's Implementation Plan. If you have any questions, comments, or concerns, please do not hesitate to contact me at george.piantka@nrgenergy.com or (760) 710-2156, or Peter Landreth at peter.landreth@nrgenergy.com or (925) 427-3567.

Sincerely,
NRG Delta, LLC/Pittsburg Generating Station



George L. Piantka, PE
Director, Environmental
NRG Energy, West Region

cc: Chuck Oliver, Pittsburg Generating Station
Peter Landreth, NRG West Region
Julie Babcock, NRG West Region