

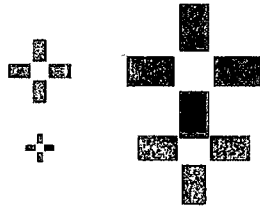


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Addendum StartPage: 0



NRG Energy, Inc.
 1303 San Antonio Street
 Suite 700
 Austin, Texas 78701

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PUBLIC UTILITY COMMISSION
 FILING CLERK

Chairman DeAnn Walker
 Commissioner Brandy Marty Marquez
 Commissioner Kenneth Anderson
 Public Utility Commission of Texas
 1701 N. Congress Avenue
 Austin, Texas 78701

Re: Project 47552- *Issues Related to the Disaster Resulting from Hurricane Harvey*

Dear Commissioners,

At the August 31st Open Meeting, Commissioner Anderson and Commissioner Marquez asked that NRG share information regarding power plant impacts and operations during and after Hurricane Harvey. Harvey was an extremely destructive storm that lingered over Southeast Texas for over four days and became the wettest tropical hurricane on record in the contiguous United States.¹ Below is information regarding the weather and operational impacts at NRG's power plant sites in ERCOT.

• **Weather Impacts at NRG Power Plant Sites**

- NRG power plant sites received extraordinary rainfall totals during the course of the storm. Sites that received the most rainfall include:²
 - San Jacinto: 47"
 - W.A. Parish: 38"
 - Cedar Bayou: 36.5"
 - Greens Bayou: 28"
 - T.H. Wharton: 25"
- The extraordinary rainfall in Southeast Texas led to unprecedented flooding at the downstream bodies of water surrounding our power plant sites. Below are some examples of the water levels observed adjacent to our sites:
 - The Brazos River adjacent to our W. A. Parish plant site crested at 56 feet. The Brazos River normally has a water level around 10 feet.³
 - Smithers Lake, the station cooling reservoir for our W. A. Parish site, reached 69.5 feet. The normal water level for the lake is 66 feet and the top of the levee is at 71 feet.
 - The Greens Bayou beside our Greens Bayou plant site crested at approximately 40 feet. The flood gauge for Greens Bayou at Ley Road (our plant site) became unoperational above 39.5 feet. The water level observed at Greens Bayou exceeded a 500-year flood frequency. The second highest recording at this gauge was 36.10 feet on June 9th, 2001, during Tropical Storm Allison.⁴ The Greens Bayou normally has a water level below 5 feet.

¹ <http://www.nhc.noaa.gov/archive/2017/al09/al092017.public.038.shtml>

² Source: Plant site rain gauge or weather stations near plant site.

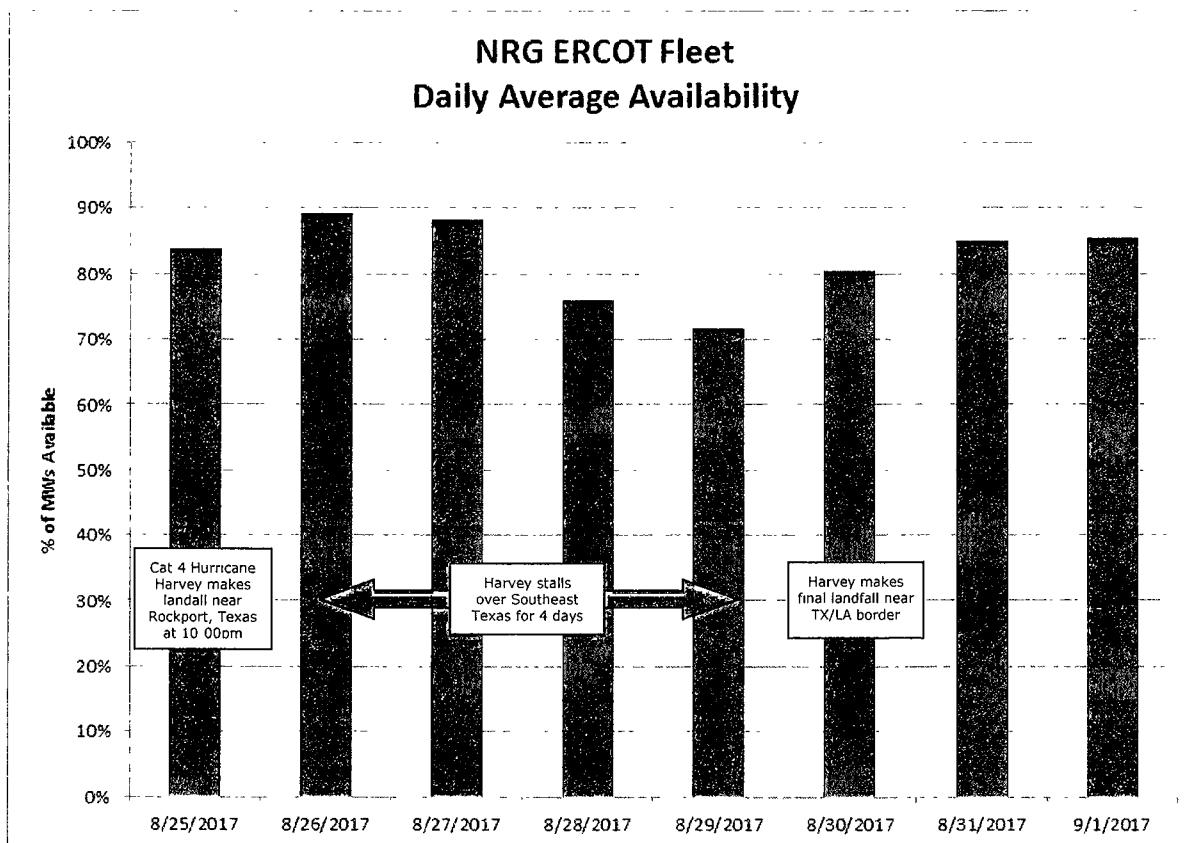
³ https://waterdata.usgs.gov/tx/nwis/uv?site_no=08116650

⁴ <https://www.harriscountyfws.org/GageDetail/Index/1610?span=24%20Hours&v=rainfall>

30

- **NRG ERCOT Generation Fleet Operational Information**


- The historic rainfall and flooding presented unique challenges for our power plant operations and personnel. Notable events and efforts during the storm include the following:
 - No plant personnel injuries or safety incidents were reported during the entire duration of the storm and through the restoration work.
 - Two of our power plant sites had to be temporarily evacuated during the storm. One due to high winds and the other due to flooding.
 - Local road flooding prevented normal shift changes. As a result, power plant staff often worked extended shifts and remained at plant sites for many days while their families were displaced by flooding.
 - The external coal pile at W. A. Parish became so saturated with rain water that coal was unable to be delivered into the silos from the conveyer system. In response to that situation, we transferred W. A. Parish Unit 5 and Unit 6 to natural gas rather than coal as the fuel source. These units haven't used natural gas for operational purposes since 2009.
- Despite the record setting rainfall and flooding, NRG's generation fleet maintained a high level of availability throughout the storm and during the days following when area flooding reached its highest levels.
 - Below is a chart of the daily average availability percentage for NRG's ERCOT generation fleet based on the amount of MWs that were available to ERCOT for the days during and after Harvey.⁵



⁵ Calculation based on Current Operating Plan (COP) data for NRG's conventional generation assets that are in operational status (i.e. not mothballed).

If you have any additional questions about this information, please contact me at 512-691-6137.

Sincerely,

A handwritten signature in black ink, appearing to read "Bill Barnes", with a long horizontal flourish extending to the right.

Bill Barnes
Director, Regulatory Affairs