

NRG Energy, Inc.
211 Carnegie Center
Princeton, NJ 08540

March 14, 2012

VIA Electronic Filing

Hon. Jaclyn Brillling, Secretary
NYS Public Service Commission
Three Empire State Plaza
Albany, New York 12223

Subject: Notice of intent to Mothball Dunkirk Units 1, 2, 3 and 4

Dear Secretary Brillling:

In accordance with the Commission's *Generating Unit Retirement Order*¹, Dunkirk Power LLC ("Dunkirk"), a wholly owned subsidiary of NRG Energy, Inc. ("NRG"), hereby provides notice that it intends to cease operation and place in NERC Inactive State Mothballed Units 1, 2, 3 and 4 at the Dunkirk facility, no later than September 10, 2012. Additionally, to the extent that it is determined prior to this date that there would be no adverse reliability impact from the mothball of any individual unit identified in this notice, NRG requests a waiver of the 180 day notice requirement and seeks the Commission's consent to cease operation of such unit or units in advance of this date.

The units are located in Dunkirk, NY, and are interconnected to the National Grid system in the New York Independent System Operator's ("NYISO") Zone A. The NYISO PTID's and nameplate capability are as follows:

UNIT NAME	NYISO PTID	NAMEPLATE MW
Dunkirk 1	23563	100.0
Dunkirk 2	23564	100.0
Dunkirk 3	23565	217.6
Dunkirk 4	23566	217.6

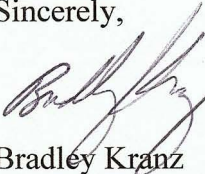
¹ Case 05-E-0889 – Proceeding on Motion of the Commission to Establish Policies and Procedures Regarding Generating Unit Retirements, *Order Adopting Notice Requirements for Generation Unit Retirements* (Issued and Effective December 20, 2005).

Due to the current and forecasted wholesale electric prices in Western New York and the underlying cost of operation, the Dunkirk facility is, and would continue to be, operating at a net loss. Thus, because the facility is not currently economic and is not expected to be economic, NRG intends to mothball the units until such time as market conditions improve. NRG reserves the right to rescind this notice and will continue to evaluate the economic conditions for any change that may warrant continuing operation of the Dunkirk facility.

It should be noted that NRG exercised its right to request a confidential Additional Reliability Study be performed to assess the impact of the lay-up of Dunkirk Units 1 & 2. This study was performed by the New York Independent System Operator, Inc. ("NYISO") and Niagara Mohawk Power Corporation [d/b/a National Grid] ("National Grid") to assess the bulk power and local reliability impacts from the lay-up of these units. Additionally, a more comprehensive reliability assessment of the impact of Western NY coal retirements, including the entire Dunkirk site has recently been completed by National Grid at the request of Department of Public Service Staff². Consequently, the potential impact of the mothball being noticed in this letter is already known and it should be possible for a determination to be made shortly after receipt of this notice in order to facilitate the waiver requested above.

NRG is simultaneously providing a copy of this notice to the NYISO and National Grid. If you have any questions, please contact me at (609) 571-2329.

Sincerely,



Bradley Kranz
Director, Regulatory & Market Affairs - NY
NRG Energy, Inc.

cc: NYISO at generator_retirement@nyiso.com
Carol Sedewitz - Director, Transmission Planning, National Grid
Bill Malee, Director - Transmission Commercial, National Grid
Mike Schiavone - Director, Transmission Control Center, National Grid

² Matter Number 11-02360 – Request for Exception from Disclosure by Niagara Mohawk Power Corporation Regarding Bulk Power Studies for Eastern and Western New York, *Final Report - Addendum to Western Division Area Review – Review of Potential EPA Impacts*, October 31, 2011.