



NRG Energy, Inc.  
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Princeton, NJ 08540

***Via Electronic Filing***

**September 5, 2024**

Hon. Michelle L. Phillips  
Secretary to the Commission  
New York State Public Service Commission  
Three Empire State Plaza  
Albany, New York 12223-1350

**Re: Matter 24-01797 – Petition of Central Hudson Gas & Electric Corporation, Consolidated Edison Company of New York, Inc, Keyspan Gas East Corporation d/b/a National Grid, New York State Electric & Gas Corporation, Niagara Mohawk Power Corporation d/b/a National Grid, Orange and Rockland Utilities, Inc., Rochester Gas and Electric Corporation, and The Brooklyn Union Gas Company d/b/a National Grid NY for Permanent Waiver of Order Requirements Regarding Environmental Disclosure Labels.**

**Dear Secretary Phillips,**

NRG Energy, Inc. (“NRG”) respectfully submits these comments supporting the Petition of the Joint Utilities requesting a permanent waiver of Order Requirements regarding Environmental Disclosure Labels (“EDLs”) which was filed on August 30, 2024 (Matter 24-01797).

**About NRG**

NRG is a leading integrated energy and home services company in North America. A Fortune 150 company, NRG is at the forefront of changing how people use, buy, and think about energy. We strive to empower our residential, commercial, and industrial customers with reliable and cost-



effective energy solutions. We draw on our deep industry experience to provide products and services that suit our customers' needs with the consistency and innovation expected from the nation's leading integrated energy and home services provider. NRG is creating a sustainable energy future by fostering smarter energy choices and providing reliable, cleaner power.

NRG's retail brands encompass one of the largest combined competitive retail energy portfolios in the U.S. with 155 TWhs of electricity and 1,918 MMDth of natural gas sold in 2022 and over seven million customers served. Our roughly 15,000 employees provide a suite of products and tools that support sustainable living, load management, and developing technologies while fostering a culture that values safety, accountability, and collaboration.

NRG has eleven licensed Energy Services Companies ("ESCOs") that are actively serving electricity and natural gas customers throughout New York since 1999<sup>1</sup>.

### **Posting EDLs to a Website is More Efficient Than a Bill Insert or Message**

The waiver requested by the Joint Utilities requesting the ability to comply with the EDL requirements by posting the documents to a website should be granted. Mailing these documents or including them as a bill insert is not only expensive and potentially harmful for the environment, but also a nuisance to customers. As explained in the Petition, these EDLs have grown to multiple pages

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<sup>1</sup> The NRG Retail Companies operating in New York include Reliant Energy Northeast LLC d/b/a NRG Home and d/b/a NRG Business Solutions, Green Mountain Energy Company, Energy Plus Holdings LLC, Energy Plus Natural Gas LLC, Independence Energy Group LLC d/b/a Cirro Energy, XOOM Energy New York, LLC, Stream Energy New York, LLC, Direct Energy Business, LLC, Direct Energy Business Marketing, LLC, Direct Energy Services, LLC, and Gateway Energy Services Company.



and can be confusing if stuffed into a customer bill. Posting these EDLs to a website will provide a better customer experience and allow customers to access the documents as often as they would like.

**Conclusion**

NRG supports the Joint Utilities' Petition filed on August 30, 2024, and urges the Commission to approve the request. Thank you for your time and consideration.

**Respectfully submitted,**

/s/ Angela Schorr

Angela Schorr

Director

Regulatory Affairs

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