



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

January 4, 2016

VIA Electronic Filing

Hon Kathleen Burgess, Secretary
New York Public Service Commission
Three Empire State Plaza
Albany, NY 12223

Subject: Notice of Intent to Mothball Astoria Gas Turbine Units 8, 10, & 11

Dear Secretary Burgess:

In accordance with the Commission's *Generating Unit Retirement Order*¹, Astoria Gas Turbine Power LLC (Astoria GT), 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 the Astoria GTs 8, 10, and 11. The units are located in Queens, NY and are interconnected to the Consolidated Edison system in the New York Independent System Operator's (NYISO) Zone J. Astoria GT 8 (NYISO PTID 24108) is approximately 19.2 MW nameplate, and Astoria GT 10 (PTID 24110), and Astoria GT 11 (PTID 24225) are each approximately 31.8 MW nameplate.

The units are Westinghouse gas turbines that were commissioned in December 1970. The units have been experiencing increasing operational challenges and have reached a point where a major overhaul would be necessary to restore their performance. Due to the advanced age and current market conditions such an investment cannot be justified at this time. Therefore, NRG has made the decision to place the units in a mothball state.

Four additional Westinghouse Astoria GTs, which have been on forced outage will be transitioned by the NYISO to an Installed Capacity Ineligible Forced Outage (IIFO) on January 1, 2016, pursuant to the NYISO's new rules under Section 5.18 of the Market Services Tariff. These units include Astoria GT 5 (NYISO PTID 24106), Astoria GT 7 (NYISO PTID 24017), Astoria GT 12 (NYISO PTID 24226), and Astoria GT 13 (NYISO PTID 24227).

As Astoria GT 8, 10, and 11 entered into a Forced Outage before May 1, 2015, they are not eligible to enter an IIFO state and are being handled under the legacy rules for mothball by the NYISO. Due to the fact that these units are currently in a forced outage state and are not being repaired, NRG respectfully requests that the Commission waive the 90 day notification period requirement and allow Units 8, 10, and 11 to enter into a Mothball Outage as soon as allowed under the NYISO's rules.

¹ Case 05-E-0889 – Proceeding on the 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).

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If you have any questions, you may contact me at (609) 455-0042 or via email at kelli.joseph@nrg.com

Sincerely,

s/ Kelli Joseph

Kelli Joseph

Director, Regulatory/Market Affairs NY

NRG Energy, Inc.