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

October 6, 2011

BY ELECTRONIC MAIL & CERTIFIED MAIL,
RETURN RECEIPT REQUESTED

Ms. Lisa P. Jackson
Office of the Administrator (MC-1101A)
U. S. Environmental Protection Agency
1200 Pennsylvania Avenue N.W.
Room 3000, Ariel Rios Building
Washington, DC 20460

Re: Docket No. EPA-HQ-OAR-2009-0491
NRG Energy Inc.'s Petition for Reconsideration of the Cross-State Air Pollution Rule

Dear Administrator Jackson:

Attached please find NRG Energy, Inc.'s *Petition for Reconsideration of "Federal Implementation Plans: Interstate Transport of Fine Particulate Matter and Ozone and Correction of SIP Approvals,"* 76 Fed. Reg. 45,210 (Aug. 8, 2011), Docket No. EPA-HQ-OAR-2009-0491)

Thank you for your assistance. If you have any questions or desire additional information, please contact me at verne.shortell@nrgenergy.com or (609) 524-4983.

Respectfully yours,

Verne Shortell
Executive Director – Environmental Business
NRG Energy, Inc.

October 6, 2011

Lisa P. Jackson
Office of the Administrator
Environmental Protection Agency
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1200 Pennsylvania Ave NW
Washington, DC 20460

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NRG Energy, Inc.'s Petition for Reconsideration of

Federal Implementation Plans: Interstate Transport of Fine Particulate Matter and Ozone and Correction of SIP Approvals 76 Fed. Reg. 45,210 (Aug. 8, 2011)

Docket ID: EPA-HQ-OAR-2009-0491

NRG Energy, Inc. ("NRG") requests that EPA reconsider certain narrow aspects of the Cross State Air Pollution Rule ("CSAPR") and make necessary corrections to the IPM modeling through the appropriate regulatory action.[1] NRG Energy, Inc. owns and operates one of the country's largest and most diverse power generation portfolios including over 16,000 MWs subject to the CSAPR. These facilities are located primarily in deregulated markets in the Northeast and Texas, and the regulated market of Louisiana.

Section 307(d)(7)(B) of the federal Clean Air Act ("CAA") provides for EPA reconsideration of a CAA rule upon objection by a petitioner. *See* 42 U.S.C.

[1] NRG is aware of the technical adjustments released on October 6, 2011 but requests a reconsideration out of caution because the proposed corrections are not final.

§ 7607(d)(7)(B). Reconsideration is appropriate when the objection raised by the petitioner was impracticable to raise during the public comment period or the grounds for the objection arise after the public comment period, if the objections are of central relevance to the outcome of the rule. *See id*.

This petition for reconsideration addresses corrections to the IPM modeling results and technical support documents as they relate to NRG's plants and associated state budgets.

New York and Texas

During last year's public comment period, NRG provided comments on CSAPR as it was first proposed, and NRG followed with comments on two subsequent Notices of Data Availability related to CSAPR.[2] With these earlier comments, particularly those in Document No. EPA-HQ-OAR-2009-0491-3792 (October 15, 2011), NRG provided corrections to information in EPA's NEEDS database as it relates to the pollution controls installed on the NRG generating units and the capabilities of that equipment. Since CSAPR was issued in final form on July 6, 2011, NRG has reviewed EPA's IPM modeling and technical support documents and found several new necessary corrections pertaining to our New York and Texas coal plants that have first surfaced with the issuance of the final rule. As a result, it was impracticable for NRG to have offered these corrections with its earlier comments, and they are appropriate for reconsideration now.

Page 8 of the technical support document, "Significant Contribution and State Emissions Budget" provides:

> Modeling of the Transport Rule also showed scrubbers operating in 2012 and in 2014 on units at Dunkirk and at Huntley in New York. However, public comments showed that these units operate dry sorbent injection, not scrubbers, which would yield a lower SO2 removal than what was modeled at those units. As a result, EPA made technical corrections to the 2012 and 2014 SO_2 budgets in New York to reflect a revised SO_2 removal rate at those units consistent with the technology reported by commenters for those units. Therefore, the corrected 2012 and 2014 budgets in New York now reflect operation of the controls reported by commenters at the affected units.

However, the IPM results suggest that the New York state budget was not adjusted to reflect NRG's October 15, 2010 comment concerning the appropriate control technology. Because this discrepancy reflects an apparent error in EPA's response to comments, it is appropriate for reconsideration at this time.

Additionally, NRG petitions for correction of the following items:

[2] NRG's earlier comments can be found in the rulemaking docket at entries no. EPA-HQ-OAR-2009-0491-2749, EPA-HQ-OAR-2009-0491-3793, and EPA-HQ-OAR-2009-0491-3933.

1. New York: Huntley Units 67 and 68 and Dunkirk Units 3 and 4 burn a 0.8 lb/mmbtu SO_2 content coal. The existing DSI is capable of an average removal rate of 50%. The IPM base case has Dunkirk and Huntley SO_2 emissions equal to 16,807 tons. The IPM remedy case has Dunkirk and Huntley SO_2 emissions equal to 2,631 tons, suggesting a SO_2 removal rate of 84% removal efficiency, which is too efficient for dry sorbent injection. Therefore, the SO_2 rate should be modeled as a 0.4 lb/mmbtu in 2012 and 0.24 lb/mmbtu in 2014.
2. New York: For NO_x, Dunkirk Units 3 and 4 are equipped with SNCRs, which can achieve an average removal rate of 25%. In 2012 and 2014, EPA should model 0.15 lb/mmbtu NO_x rate, not 0.10 lb/mmbtu in 2012 or 0.07 in 2014, which suggest an SCR and 50% removal efficiency. These corrections should be applied in both the IPM 2012 and 2014 Remedy files as well as the base case files.
3. New York: EPA should align the assumed VOM to the existing SNCRs and DSI on all units at Huntley and Dunkirk. The current EPA modeling assumes wet scrubbers on Huntley 67 and 68 and Dunkirk 3 and 4 and SCRs on Dunkirk 3 and 4.
4. Texas: NRG's Limestone Units 1 and 2 are equipped with low-NO_x burners, though the retrofit technology for Unit 1 is listed as an SCR in the IPM 2012 and 2014 remedy files. Furthermore, both Units 1 and 2 are modeled with a NO_x emission rate of 0.16 lb/mmbtu in 2012 and 2014, which underestimates the current emission rate of approximately 0.20 lb/mmbtu.
5. Texas: W.A. Parish Unit 6 burns 0.8 lb/mmbtu SO_2 content coal. The SO_2 emission rate is modeled in 2012 and 2014 as 0.06 lb/mmbtu, suggesting over 90% removal efficiency achievable with a wet scrubber. The unit does not have a scrubber, and there are no current plans to add a scrubber. The SO_2 rate should be modeled as 0.8 lb/mmbtu in both 2012 and 2014. The control assumption should be corrected in EPA's IPM 2012 and 2014 remedy files and the 2012 and 2014 base case files.

NRG has also provided tables in Attachment 1 that illustrate the requested corrections to the IPM 2012 and 2014 remedy files. The above-listed corrections are appropriate for reconsideration because they relate to EPA's final IPM modeling and technical support data that are used to determine state budgets. Because this information was only associated with the final rule, the grounds for NRG's objections in this Petition for Reconsideration arose after the public comment period.

Louisiana

In addition, NRG believes that the IPM model did not adequately address transmission constraints in the Entergy Region of SERC. NRG did not comment on this issue during the comment period because the proposed state budget was 21,220 tons and in line with the 2009 overall state ozone season NO_x emissions of 20,891 tons. Because the state budget included in the proposed rule was reduced by 37% in the final rule, the

grounds for NRG's objections arose after the public comment period. As a result, it was impracticable for NRG to have raised this issue as part of its earlier comments, and they are appropriate for reconsideration now.

Notably, the U.S. Department of Energy (DOE), in its 2009 National Electric Transmission Congestion Study, recognized that the Entergy Region had the highest firm MWhs curtailed when Transmission Loading Relief (TLRs) were instituted to reduce line loading to address a potential or actual security limit violation on the transmission system.[3] As stated by the DOE, the Entergy region contains a number of significant transmission constraints that limit electricity flows, including in Louisiana.[4] Because the EPA's IPM model assumed economic dispatch without considering transmission constraints that would impact such dispatch, the modeling fails to take into account two unavoidable and important realities of the Entergy region: (1) that units with higher NO_x emission rates may have to run to address reliability concerns; and (2) transmission constraints limit the state's ability to import out-of-state power to levels that are far below those assumed in the modeling.

Without consideration of transmission constraints, EPA models the state budget for ozone season NO_x in Louisiana as unrealistically low (44% off 2010 emissions with no new scheduled control equipment), forcing the state to trigger the assurance provisions in CSAPR. This, in turn, contributes to the fact that individual facilities are at serious risk to trigger the assurance provisions due to the state's likely exceedance. For example, NRG's generation in Louisiana, owned and operated by its subsidiary Louisiana Generating LLC (LaGen), triggers the variability provisions. Further, based on the EPA 2012 remedy file, LaGen's Big Cajun I and II plants, and NRG Bayou Cove, are predicted to emit 5,346 tons of ozone season NOx in 2012. These emissions are significantly greater than NRG's Louisiana allowance allocation of 2,885 tons and variability limit of 3,491 tons. Thus, modeling with consideration of transmission contraints would more realistically estimate the state's emissions and prevent individual facilities from automatically triggering the assurance provisions.

The State regulatory bodies in the Entergy footprint are each represented on the Entergy Regional State Committee ("ERSC").[5] At each quarterly meeting of the ERSC, the Southwest Power Pool, as the Entergy Independent Coordinator of Transmission, reports on the amount of transmission congestion in the Entergy region. The existence of transmission constraints in Louisiana is well documented and should be considered in development of the Louisiana state budget. In Attachment 2, NRG is providing two

[3] U.S. Department of Energy, National Electric Transmission Congestion Study, 2009, at pp. 34-36.
[4] Id. at p. 61-62. The DOE stated: "The Entergy region contains a number of significant transmission constraints that limit electricity flows, as evidenced by the high number of TLRs mentioned in Section 4.3.2 above. By design, these TLRs interrupt non-firm transactions (primarily from independent power producers and merchant generators) and firm transmission (often from merchant generators). The number of TLRs in Louisiana has increased since 2006. Although the Department's 2006 study speculated that historic congestion levels in the state would go down because of lower load following Hurricane Katrina in 2005, in fact the opposite has occurred."
[5] The ERSC is composed of one representative from the Texas PUC, the Louisiana PSC, the Mississippi PSC, the Arkansas PSC and the City Council of New Orleans.

documents presented at the August 25, 2011 ERSC meeting to indicate the nature and severity of transmission constraints in the Entergy region including Louisiana: 4a-portion of ERSC Metrics 2011-06 and 5-Entergy Stakeholder Policy Committee Update. The EPA should consider these transmission constraints to more accurately reflect the supply of electricity that must be generated in Louisiana, the emissions that will result from that generation and the additional allowances that should be granted in the final state budget.

NRG requests that EPA make the corrections discussed in this petition through appropriate regulatory action. In closing, we recognize the effort of EPA to resolve the problem of interstate transport of emissions and petition for reconsideration of these limited issues to ensure EPA's modeling is accurate.

Attachment 1

Table 1. SO2 Emission Rates Revisions

Unique Id	Plant Name	EPA Modeled 2012 Remedy SO2 rate (lb/mmbtu)	NRG Revised 2012 Rate (lb/mmbtu)	EPA Modeled 2014 Remedy SO2 rate (lb/mmbtu)	NRG Revised 2014 Rate (lb/mmbtu)
3470_B_WAP6	W A Parish	0.06	0.80	0.06	0.80
2549_B_67	C R Huntley Generating Station	0.08	0.40	0.08	0.24
2549_B_68	C R Huntley Generating Station	0.08	0.40	0.08	0.24
2554_B_3	Dunkirk Generating Station	0.07	0.40	0.06	0.24
2554_B_4	Dunkirk Generating Station	0.07	0.40	0.06	0.24
2554_B_1	Dunkirk Generating Station	0.26	0.40	0.26	0.24
2554_B_2	Dunkirk Generating Station	0.26	0.40	0.26	0.24

Table 2. NOx Emission Rate Revisions

Unique Id	Plant Name	2012 Remedy_NOx rate lb/mmbtu (calculated from TR_Remedy_Final_2012)	NRG Revised 2012 Remedy_NOx rate lb/mmbtu (calculated from TR_Remedy_Final_2012)	2014 Remedy NOx lb/mmbtu (calculated from TR_Remedy_Final_2014)	NRG Revised 2014 Remedy NOx lb/mmbtu (calculated from TR_Remedy_Final_2014)
Limestone	298_B_LIM1	0.16	0.20	0.16	0.20
Limestone	298_B_LIM2	0.17	0.20	0.17	0.20
Dunkirk	2554_B_3	0.10	0.15	0.07	0.15
Dunkirk	2554_B_4	0.10	0.15	0.07	0.15

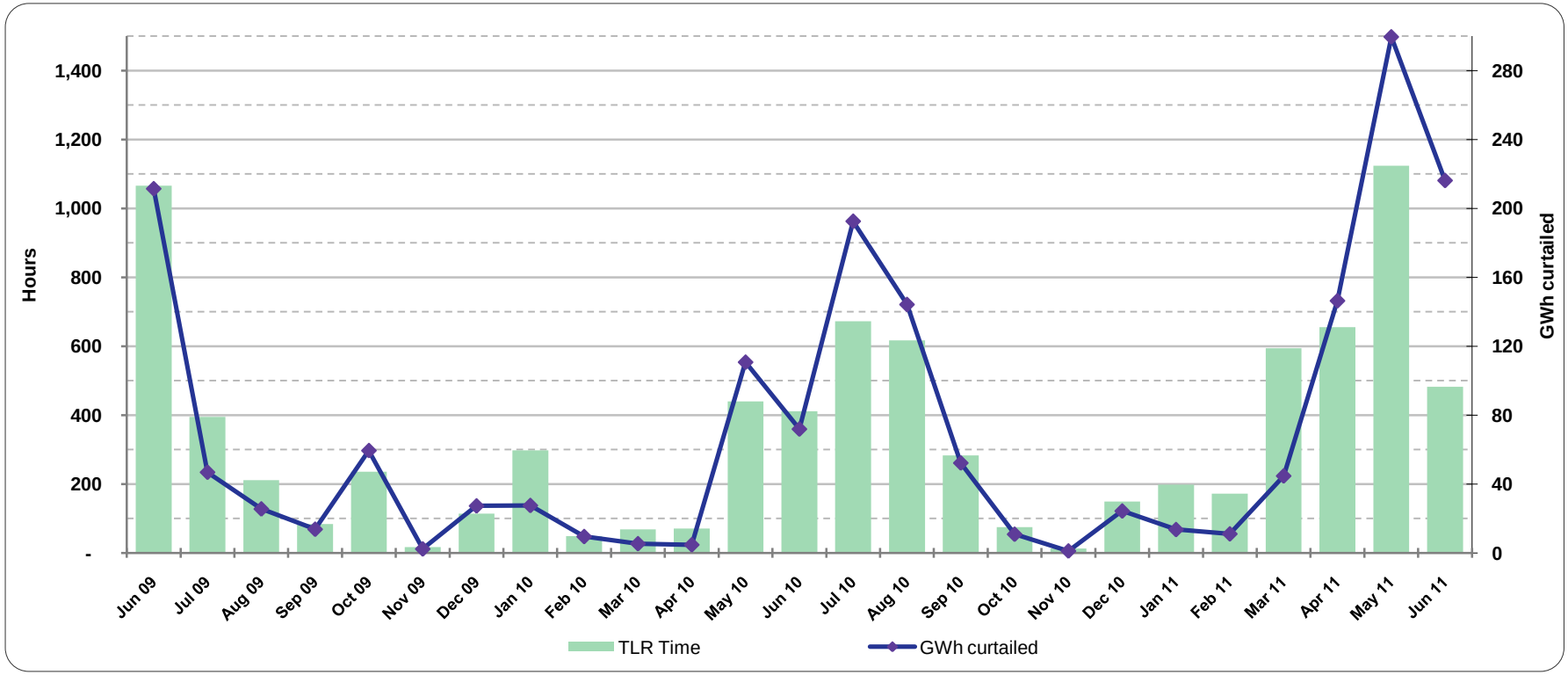
Attachment 2

4a- portion of ICT Quarterly Performance Report (September 30, 2011)

4a- portion of ICT Quarterly Performance Report (September 30, 2011)

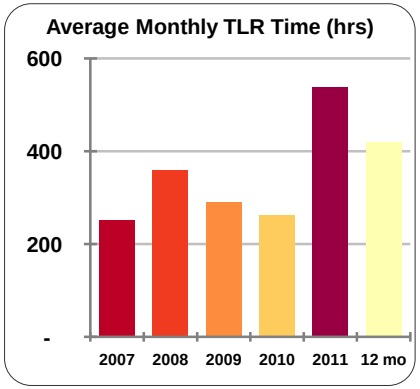
SPP ICT

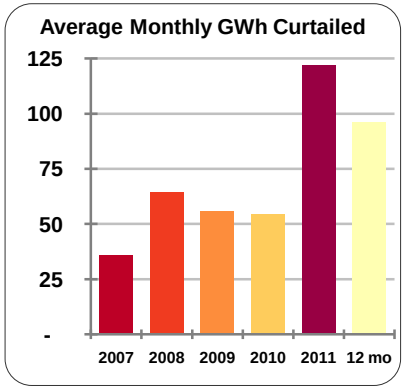
1a. Congestion - TLR Time and Curtailments



	Jun 10	Jul 10	Aug 10	Sep 10	Oct 10	Nov 10	Dec 10	Jan 11	Feb 11	Mar 11	Apr 11	May 11	Jun 11
TLR Time (hours)	411	672	617	283	75	13	149	198	172	594	655	1,124	482
GWh curtailed	71.9	192.5	144.2	52.2	10.9	1.2	24.4	13.6	11.1	44.7	146.3	299.5	216.1

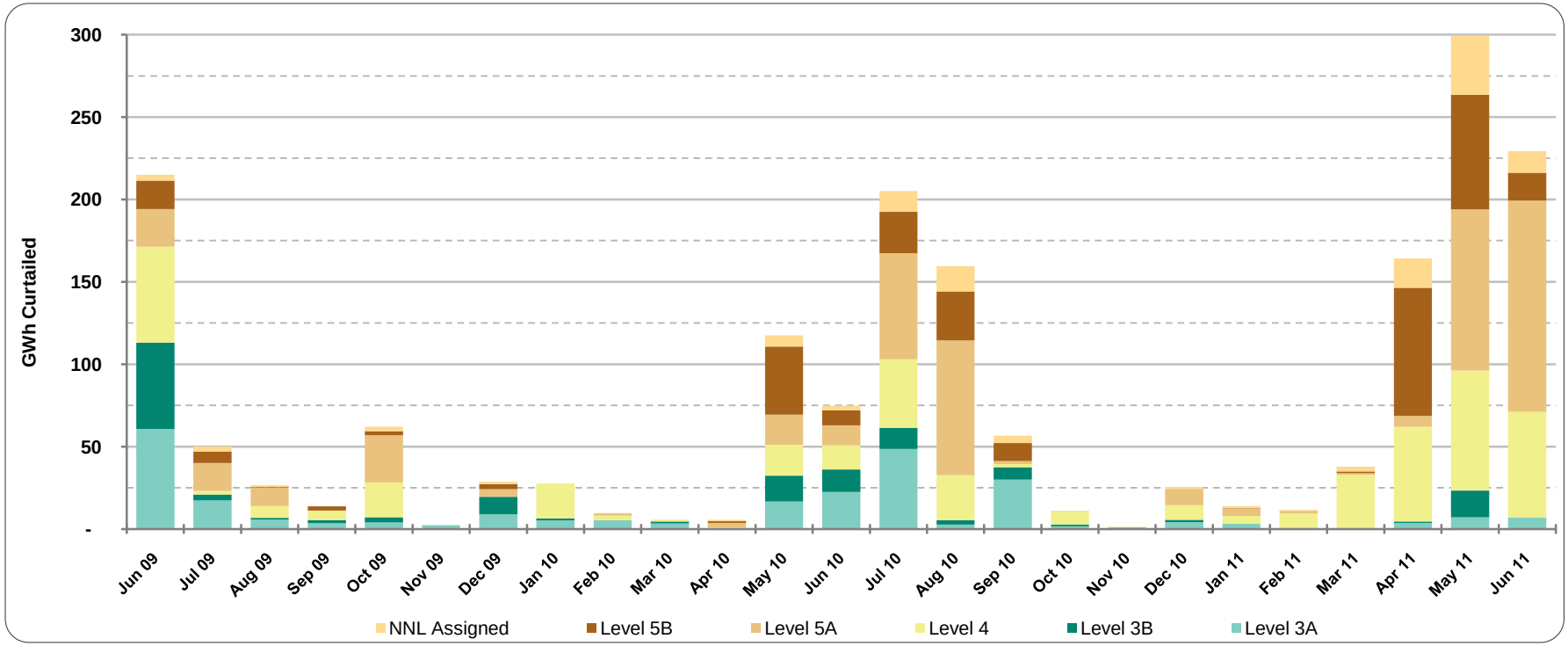
	2007	2008	2009	2010	2011	last 12 months
TLR Time (hours)	252	359	291	262	538	420
GWh curtailed	36	65	56	55	122	96
	Monthly Average					





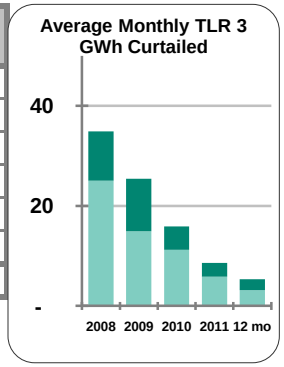
SPP ICT

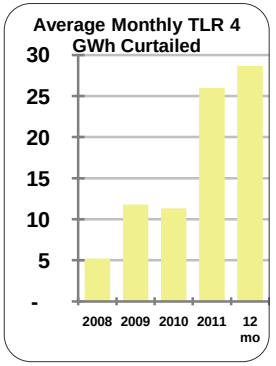
1b. Congestion - by TLR Level (GWh)

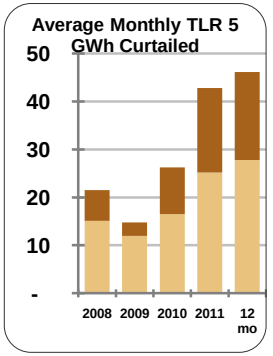


in GWh	Jun 10	Jul 10	Aug 10	Sep 10	Oct 10	Nov 10	Dec 10	Jan 11	Feb 11	Mar 11	Apr 11	May 11	Jun 11
Level 3A	22.5	48.6	2.7	30.0	1.7	1.0	4.2	3.3	0.0	0.0	3.7	7.2	7.1
Level 3B	13.6	12.7	2.7	7.5	1.0	0.0	1.4	0.0	0.5	0.0	0.8	16.2	0.0
Level 4	14.8	41.7	27.3	1.8	7.8	0.0	9.0	4.7	9.0	33.0	57.6	72.8	64.0
Level 5A	12.0	64.3	81.6	1.8	0.3	0.1	9.8	4.7	1.5	1.0	6.7	97.9	128.2
Level 5B	9.1	25.2	29.7	11.0	0.0	0.0	0.0	0.1	0.0	1.0	77.6	69.5	16.9
NNL Assigned	2.9	12.6	15.3	4.4	0.0	0.0	1.2	1.2	0.6	2.8	17.8	36.0	13.2

in GWh	2007	2008	2009	2010	2011	last 12 months
Level 3A	15.7	25.1	14.9	11.2	5.8	3.1
Level 3B	9.1	9.8	10.5	4.7	2.7	2.2
Level 4	7.3	5.2	11.8	11.3	26.0	28.6
Level 5A	8.3	15.1	11.9	16.5	25.2	27.8
Level 5B	1.5	6.4	2.8	9.8	17.6	18.3
NNL Assigned	-	2.4	1.5	3.8	7.7	8.1
	Monthly Average					

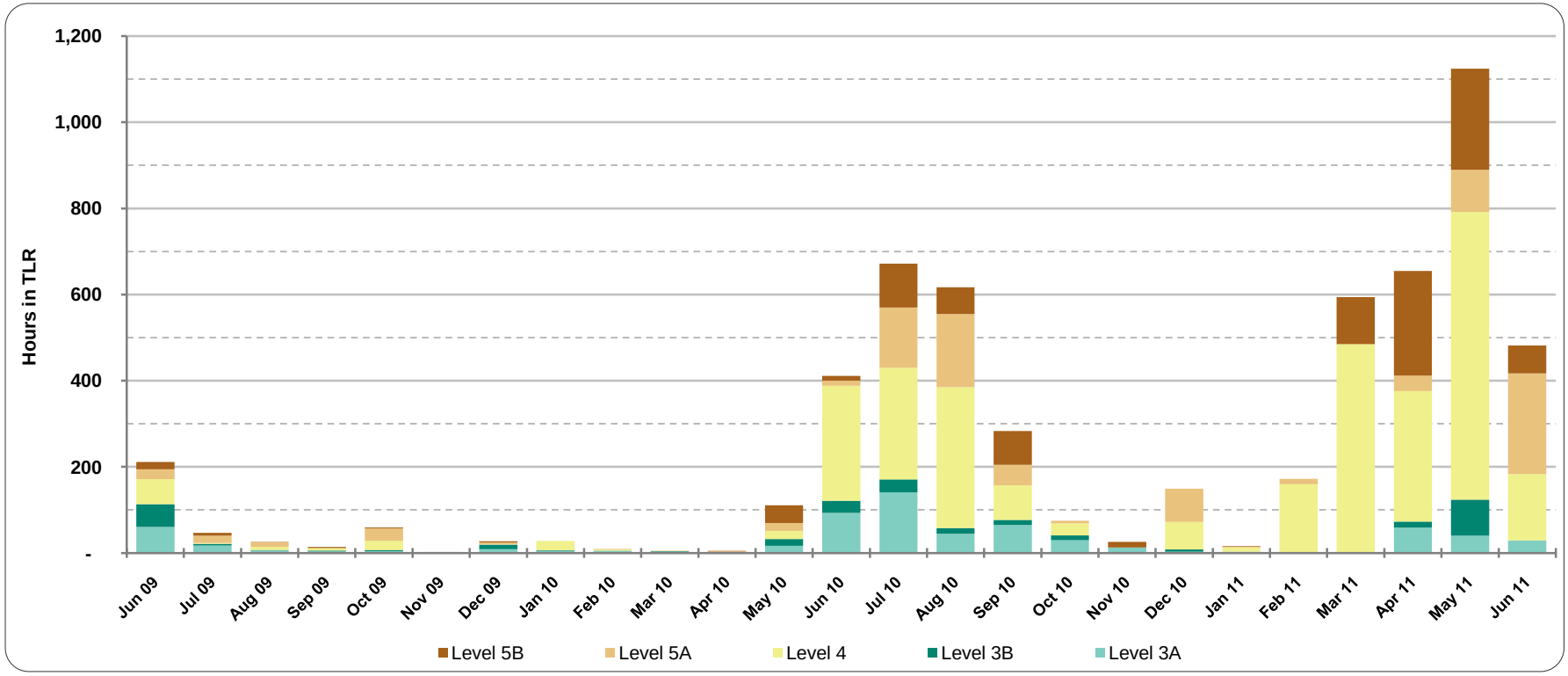






SPP ICT

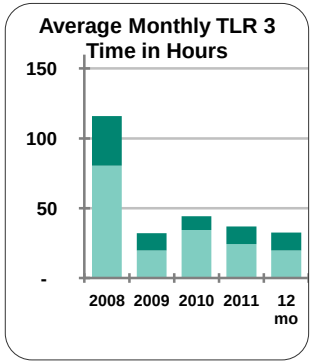
1c. Congestion - by TLR Level (Hours)

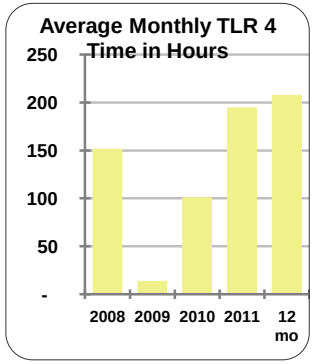


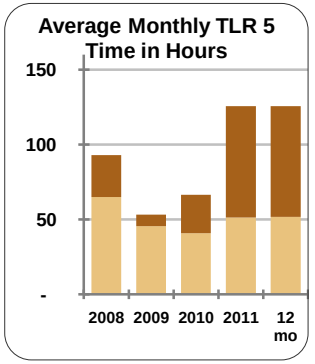
in Hours	Jun 10	Jul 10	Aug 10	Sep 10	Oct 10	Nov 10	Dec 10	Jan 11	Feb 11	Mar 11	Apr 11	May 11	Jun 11
Level 3A	93	141	45	65	30	13	3	3	-	-	59	40	29
Level 3B	28	30	13	12	11	-	5	-	2	-	14	84	-
Level 4	267	259	327	80	28	-	64	10	158	485	303	668	154
Level 5A	12	140	170	48	6	-	77	2	12	-	36	98	234
Level 5B	11	102	62	78	-	13	-	1	-	109	243	234	65

in Hours	2008	2009	2010	2011	last 12 months
Level 3A	80.3	19.6	34.4	24.2	19.7
Level 3B	35.6	12.3	9.8	12.8	12.9
Level 4	152.0	14.2	101.1	195.0	207.8
Level 5A	65.0	45.5	40.7	51.3	51.7
Level 5B	28.0	7.6	25.8	74.3	73.9
	Monthly Average				

Note: *SPP ICT TLR data is captured based on the highest TLR level per event, not the actual level for each hour of an event.*



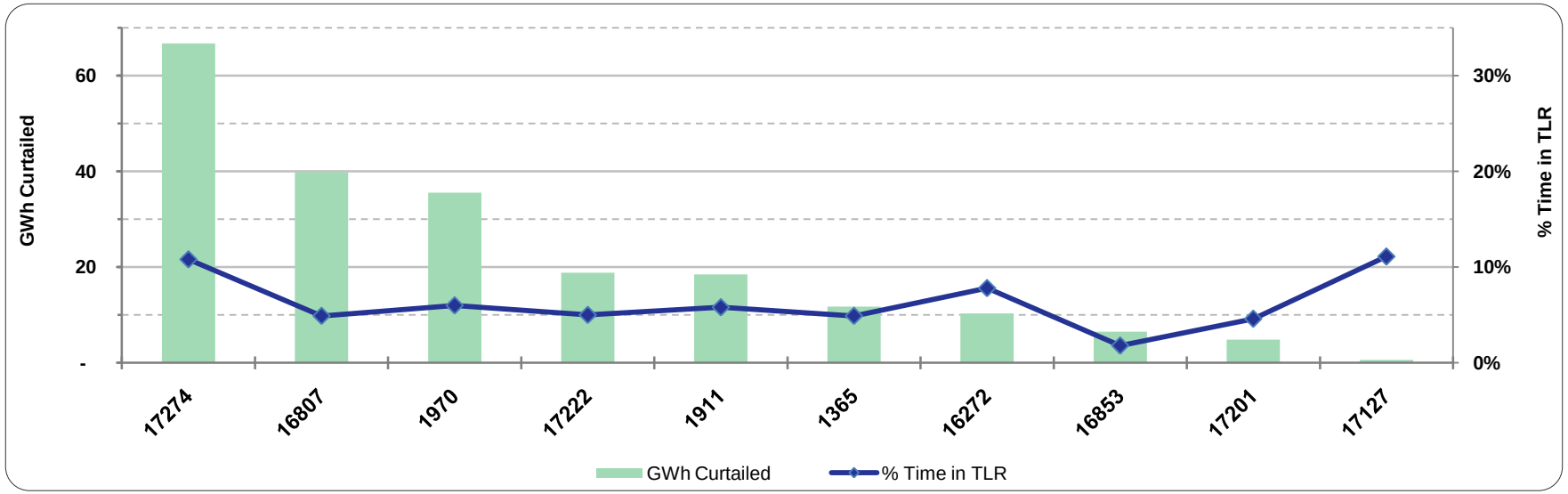




SPP ICT

1f. Congestion - by Flowgate

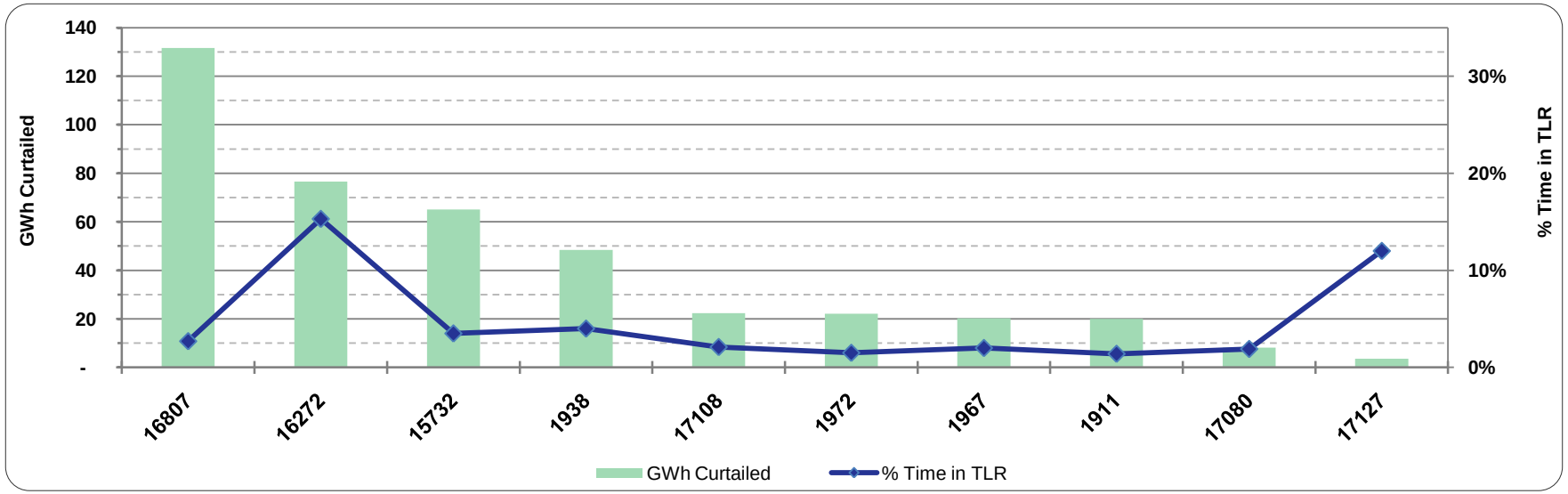
June 2011



Flowgate ID	Flowgate Location (kV)	State	GWh Curtailed	% Time in TLR	Proposed Solution [estimated completion date]
17274	West Memphis AT1 161/500 kV ftlo SanSouci-Shelby 500 kV	Arkansas	66.7	10.8%	Number of outages in Arkansas due to tornado-producing storms. All lines repaired. No projects planned.
16807	Dell - San Souci 500 kV	Arkansas	39.8	4.9%	Number of outages in Arkansas due to tornado-producing storms. All lines repaired. No projects planned.
1970	W Memphis-Birmingham Steel 500 kV ftlo SanSouci-Shelby 500 kV	Arkansas	35.5	6.0%	West Memphis 500 kV substation terminal equipment upgrades [economic upgrade] (spring 2011)
17222	Vienna-RustonE 115 kV ftlo Eldorado-Sterlington 500 kV	Arkansas/ Louisiana	18.8	5.0%	No project identified.
1911	Hartburg-Inland Orange 230 kV for the loss of Hartburg-Cypress 500 kV	Texas	18.5	5.8%	Hartburg to Inland to McLewis Upgrade (2011)
1365	West Memphis - Birmingham Steel 500k V ftlo Dell - Sans Souci 500 kV	Arkansas	11.7	4.9%	West Memphis 500 kV substation terminal equipment upgrades [economic upgrade] (spring 2011)
16272	Nelson AT1 500/230 kV ftlo Hartburg - Cypress 500 kV	Louisiana/Texas	10.3	7.8%	Operational issue that resulted from unit outage scheduling; No specific project proposed
16853	W. Memphis Xfmr 500/161 kV ftlo Keo-ISES 500 kV	Arkansas	6.5	1.8%	Due to jointly planned 500 kV outage on the West Memphis (EAI) - Birmingham Steel (TVA) line for upgrades
17201	Osceola-Wilson 161 kV ftlo Sans Souci-Shelby 500kV	Arkansas	4.9	4.6%	Number of outages in Arkansas due to tornado-producing storms. All lines repaired. No projects planned.
17127	Bull Shoals - Midway 161 kV ftlo Bull Shoals - Buford 161 kV	Arkansas	0.6	11.1%	Number of outages in Arkansas due to tornado-producing storms. All lines repaired. No projects planned.

SPP ICT

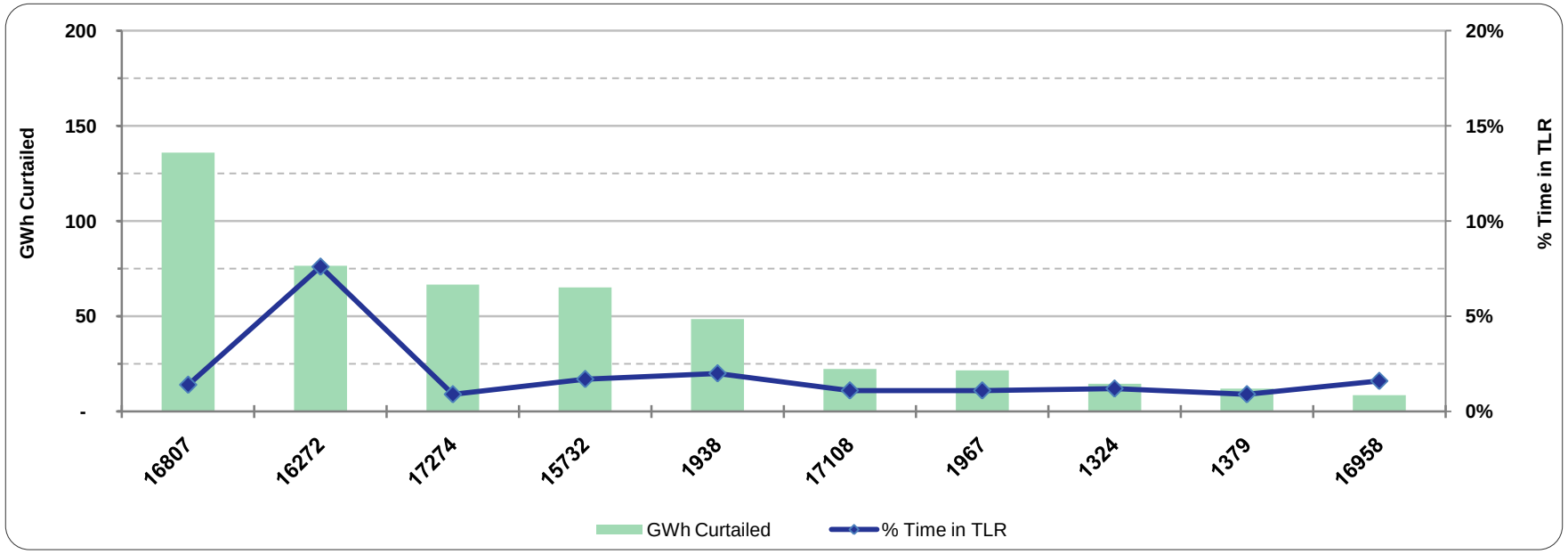
1f. Congestion - by Flowgate (2011 year-to-date)



Flowgate ID	Flowgate Location (kV)	State	GWh Curtailed	% Time in TLR	Proposed Solution [estimated completion date]
16807	Dell - San Souci 500 kV	Arkansas	131.7	2.7%	Number of outages in Arkansas due to tornado-producing storms. All lines repaired. No projects planned.
16272	Nelson AT1 500/230 (ftlo) Hartburg - Cypress 500 kV	Louisiana/Texas	76.5	15.3%	Operational issue that resulted from unit outage scheduling; No specific project proposed
15732	Willow Glen 500/230 AT2 flo Willow Glen-Waterford 500 kV	Louisiana	65.1	3.5%	Transformer out of service. Solution: Bayou Laboutte Project (2011 Winter)
1938	Sheridan-El Dorado 500 kV ftlo Etta-McNeil 500 kV	Arkansas	48.5	4.0%	Sheridan South Economic Project (2012)
17108	ANO - Mabelvale 500 kV	Arkansas	22.3	2.1%	Number of outages in Arkansas due to tornado-producing storms. All lines repaired. No projects planned.
1972	Webre-Willow Glen 500 kv ftlo Big Cajun-Fancy 500kv	Louisiana	22.1	1.5%	"Willow Glen –Webre 500 kV Line: Replace/change line relay CTs / ratio at Willow Glen (Winter 2011)Webre Sub: terminal equipment upgrade part of Bayou LaBoutte project (Winter 2011)"
1967	Arkansas (ANO) - Pleasant Hills 500 kV ftlo Arkansas - Mabelvale 500 kv	Arkansas	20.2	2.0%	Number of outages in Arkansas due to tornado-producing storms. All lines repaired. No projects planned.
1911	Hartburg-Inland Orange 230 kV ftlo Hartburg-Cypress 500 kV	Texas	20.0	1.4%	Hartburg to Inland to McLewis Upgrade (2011)
17080	ISES AT2 ftlo ISES - Dell	Arkansas	8.2	1.9%	Number of outages in Arkansas due to tornado-producing storms. All lines repaired. No projects planned.
17127	Bull Shoals - Midway 161 kV ftlo Bull Shoals - Buford 161 kV	Arkansas	3.6	12.0%	Number of outages in Arkansas due to tornado-producing storms. All lines repaired. No projects planned.

SPP ICT

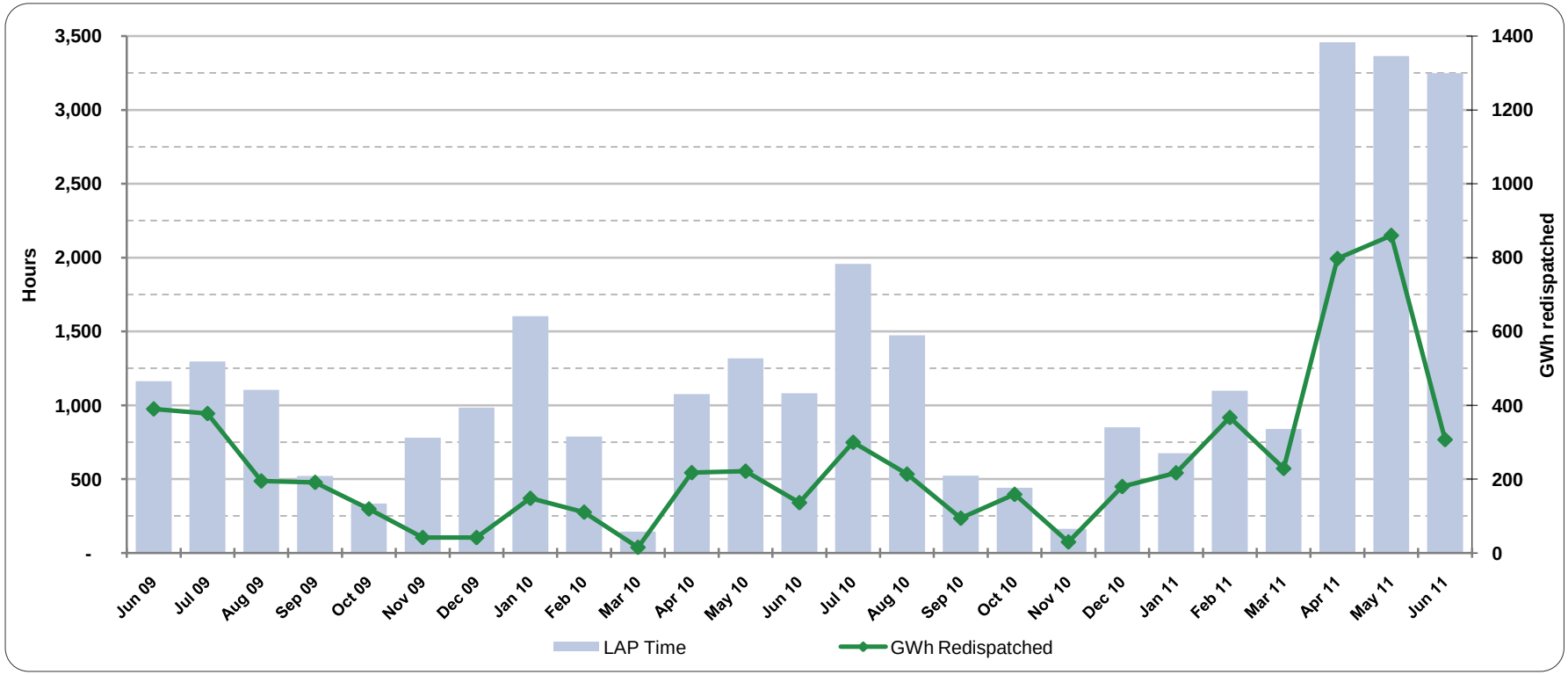
1f. Congestion - by Flowgate (12 months ending June 2011)



Flowgate ID	Flowgate Location (kV)	State	GWh Curtailed	% Time in TLR	Proposed Solution [estimated completion date]
16807	Dell - San Souci 500kv	Arkansas	135.8	1.4%	Upgrade terminal equipment (Spring 2011)
16272	Nelson AT1 500/230 ftlo Hartburg - Cypress 500kV	Louisiana/Texas	76.5	7.6%	Operational issue that resulted from unit outage scheduling; No specific project proposed
17274	West Memphis AT1 161/500 kV ftlo SanSouci-Shelby 500 kV	Arkansas	66.7	0.9%	West Memphis 500 kV substation terminal equipment upgrades [economic upgrade] (spring 2011)
15732	Willow Glen 500/230 AT2 flo Willow Glen-Waterford 500 kV	Louisiana	65.1	1.7%	Bayou Laboutte Project (2011 Winter)
1938	Sheridan-El Dorado 500 kV ftlo Etta-McNeil 500 kV	Arkansas	48.5	2.0%	Sheridan South Economic Project (2012)
17108	ANO - Mabelvale 500kV	Arkansas	22.3	1.1%	Number of outages in Arkansas due to tornado-producing storms. All lines repaired. No projects planned.
1967	Arkansas (ANO) - Pleasant Hills 500 kv ftlo Arkansas - Mabelvale 500 kv	Arkansas	21.6	1.1%	Number of outages in Arkansas due to tornado-producing storms. All lines repaired. No projects planned.
1324	White Bluff - Sheridan 500kV ftlo Mabelvale - Sheridan 500kV	Arkansas	14.6	1.2%	Sheridan South Economic Project (2012)
1379	Grimes - Mt. Zion 138 kV ftlo Grimes - Walden 138 kV	Texas	12.1	0.9%	Upgrade Grimes to Mt. Zion (2017)
16958	Van Ply - Toledo Bend 138 kV ftlo Crockett - Grimes 345 kV	Texas	8.6	1.6%	Upgrade CT at Toledo Bend. (Winter 2011)

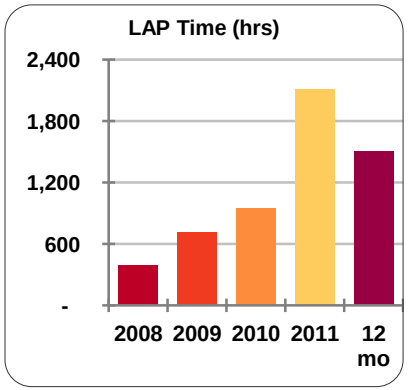
SPP ICT

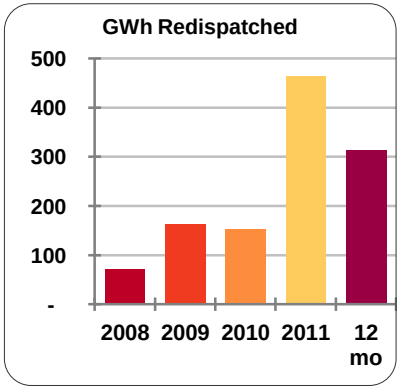
1a. Congestion - LAP Time and Redispatch



	Jun 10	Jul 10	Aug 10	Sep 10	Oct 10	Nov 10	Dec 10	Jan 11	Feb 11	Mar 11	Apr 11	May 11	Jun 11
LAP Time (hours)	1,082	1,957	1,473	523	441	163	851	675	1,099	840	3,459	3,365	3,249
GWh redispatched	136	300	214	94	159	30	180	217	367	229	797	860	307

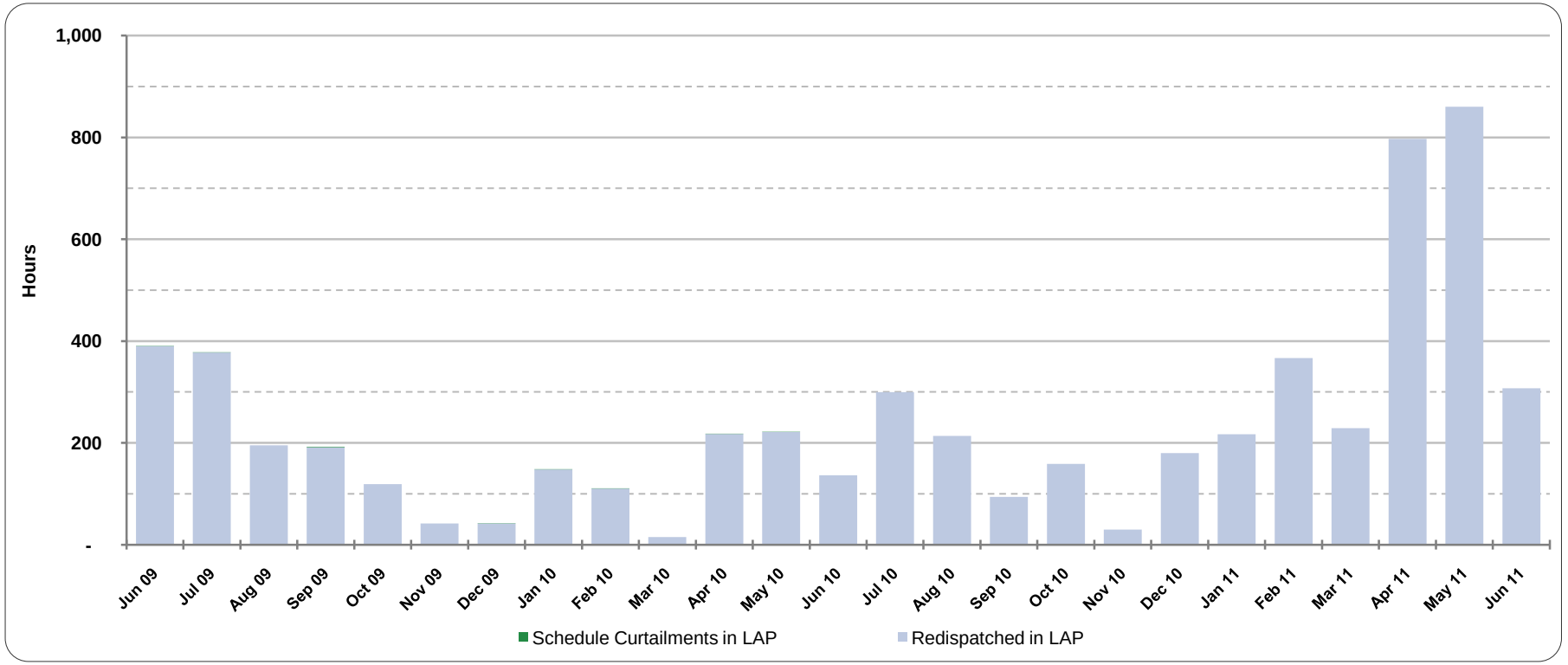
	2008	2009	2010	2011	last 12 months
LAP Time (hours)	398	714	952	2,115	1,508
GWh redispatched	72	163	152	463	313
	Monthly Average				





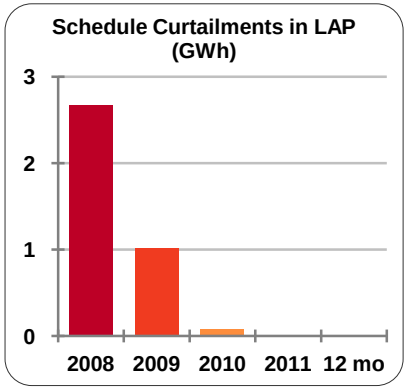
SPP ICT

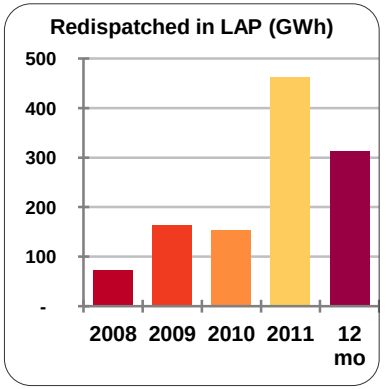
1b. Congestion - LAP Redispatch and Schedule Curtailments



in GWh	Jun 10	Jul 10	Aug 10	Sep 10	Oct 10	Nov 10	Dec 10	Jan 11	Feb 11	Mar 11	Apr 11	May 11	Jun 11
Schedule Curtailments in LAP	-	-	-	-	-	-	-	-	-	-	-	-	-
Redispatched in LAP	136.2	299.6	213.5	94.1	158.7	29.8	179.8	216.9	366.8	228.9	797.3	860.0	307.0

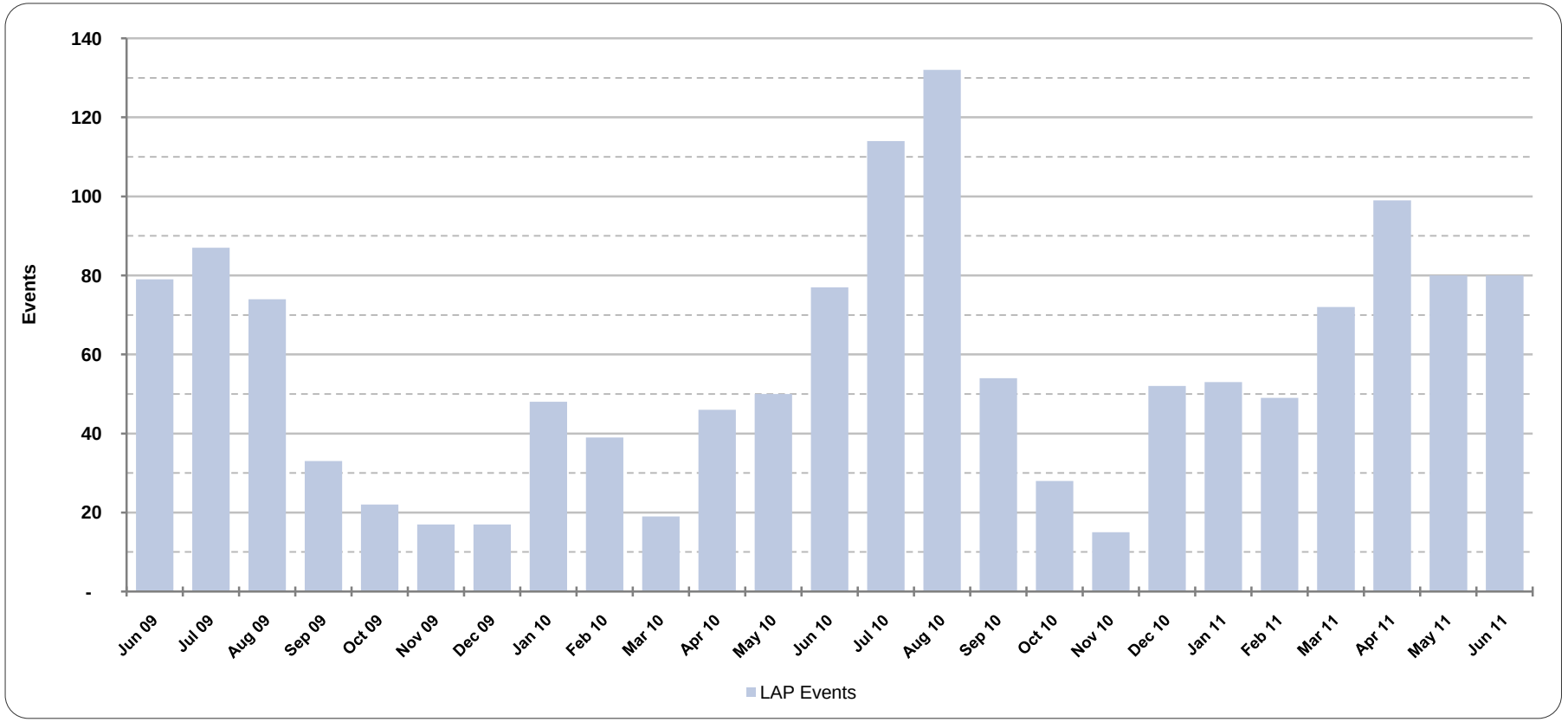
in GWh	2008	2009	2010	2011	last 12 months
Schedule Curtailments in LAP	2.7	1.0	0.1	-	-
Redispatched in LAP	72	163	152	463	313
	Monthly Average				





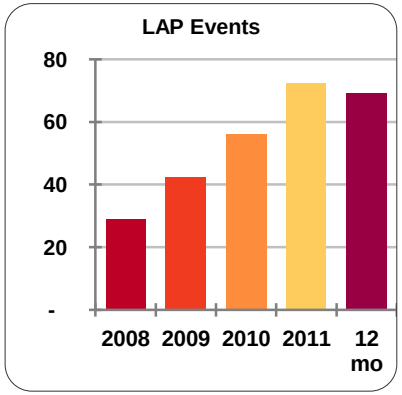
SPP ICT

1c. Congestion - LAP Events



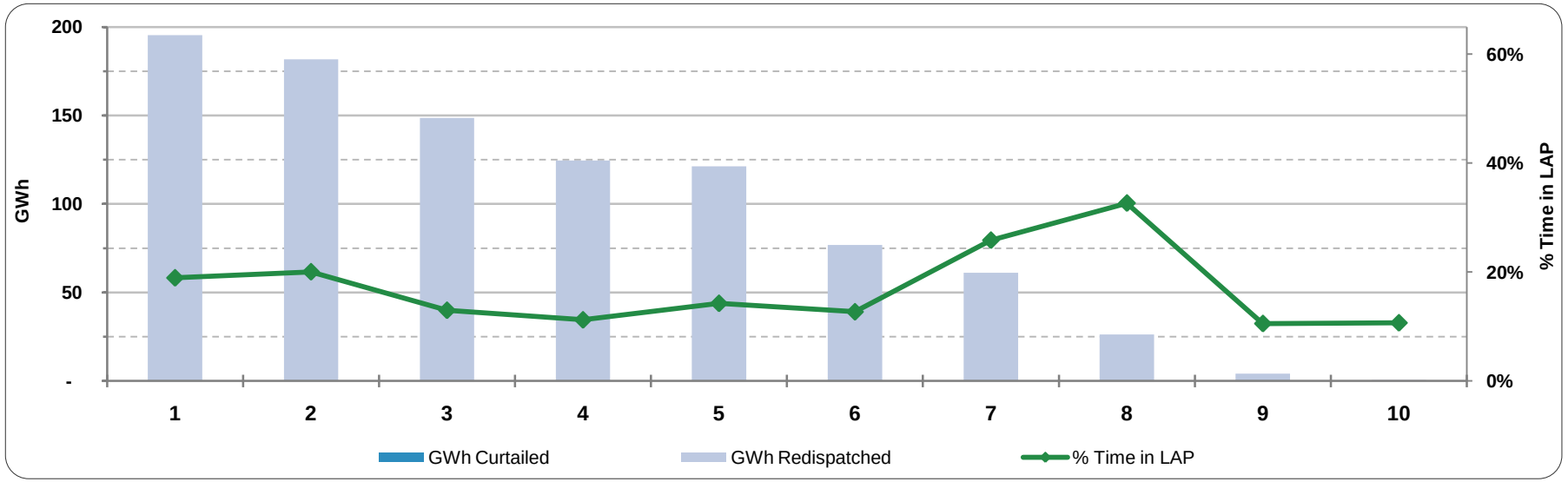
	Jun 10	Jul 10	Aug 10	Sep 10	Oct 10	Nov 10	Dec 10	Jan 11	Feb 11	Mar 11	Apr 11	May 11	Jun 11
LAP Events	77	114	132	54	28	15	52	53	49	72	99	80	80

	2008	2009	2010	2011	last 12 months
LAP Events	29	42	56	72	69
	Monthly Average				



SPP ICT

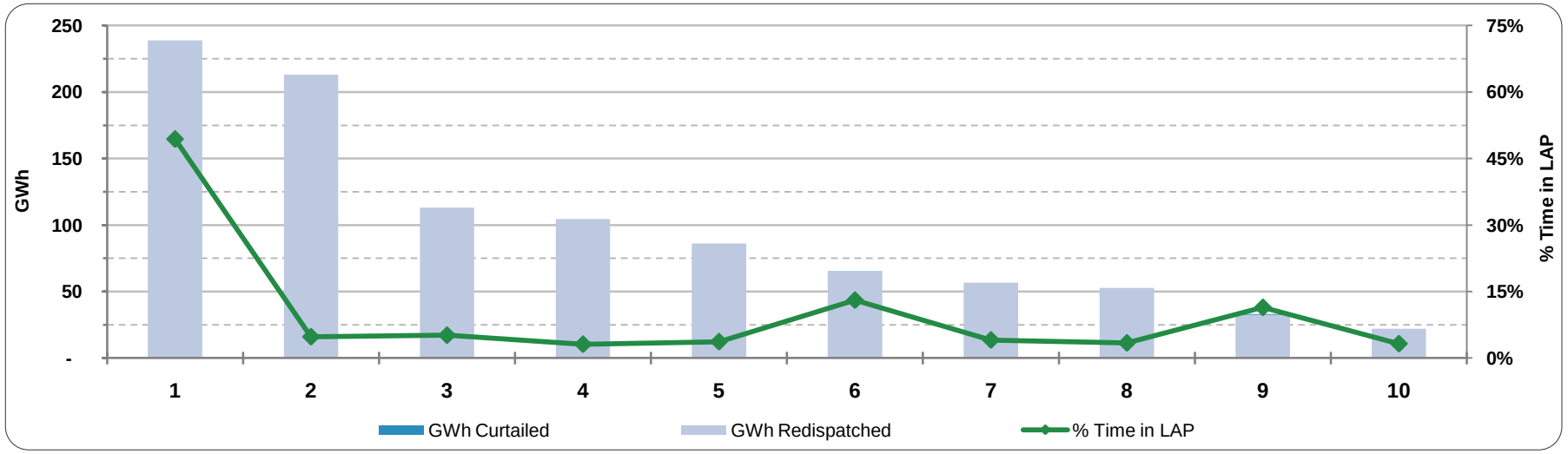
1f. Congestion - by Flowgate (LAP) - 2011



Rank	Flowgate Location (kV)	State	% Time in LAP	GWh Redispatched	GWh Schedules Curtailed	Proposed Solution [estimated completion date]
1	LR Pinnacle - LR Walton Heights 115 kV FTLO ANO - Mabelvale 500 kV	Arkansas	18.9%	195.4	0.0	Holland Bottoms (12/31/2011)
2	Bailey - Shoffner 161 kV FTLO Independence - Dell 500 kV	Arkansas	20.0%	181.7	0.0	No specific project proposed. LAP resulted from unplanned outage of the West Memphis to Keo 500 kV line.
3	Sterlington - Oak Ridge 115 kV FTLO Perryville - Baxter Wilson 500 kV	Louisiana	13.0%	148.6	0.0	Projects: NELA Improvement Project Phase 1: Construct new Swartz to Oakridge 115 kV line (Winter 2012); NELA Improvement Project Phase 2: Construct new Oakridge to Dunn 115 kV line (Summer 2013)
4	Willow Glen AT2 500 / 230 kV FTLO Fancy Auto 500/230 500 / 230 kV	Louisiana	11.2%	124.6	0.0	Bayou LaBoutte Project (2011 Winter)
5	Webre - Willow Glen 500 kV FTLO Big Cajun - Fancy Point 500 kV	Louisiana	14.3%	121.2	0.0	Willow Glen –Webre 500 kV Line: Replace/change line relay CTs / ratio at Willow Glen (Winter 2011)
6	Grimes - Mt. Zion 138 kV FTLO Grimes - Bentwater 138 kV	Texas	12.7%	76.8	0.0	Upgrade Grimes - Mt. Zion (2017)
7	Addis - Tiger 230 kV FTLO Dow Meter - Air Liquid 230 kV	Louisiana	25.8%	61.2	0.0	No specific project proposed. Generation redispatch to address QF put.
8	Redgum - Natchez 115 kV FTLO Plantation - Vidalia 115 kV	Louisiana / Mississippi	32.6%	26.3	0.0	Utilize operating guide for capacitor bank utilization in the Plantation/Red Gum/ Natchez areas to help minimize reactive power flows on Natchez to Redgum line.
9	Redgum - Natchez SES 115 kV FTLO Plantation - Vidalia 115 kV	Louisiana / Mississippi	10.6%	4.1	0.0	No specific project proposed.
10	Plantation - South Ferriday 115 kV FTLO Plantation - Vidalia 115 kV	Louisiana	10.7%	0.5	0.0	No specific project proposed.

SPP ICT

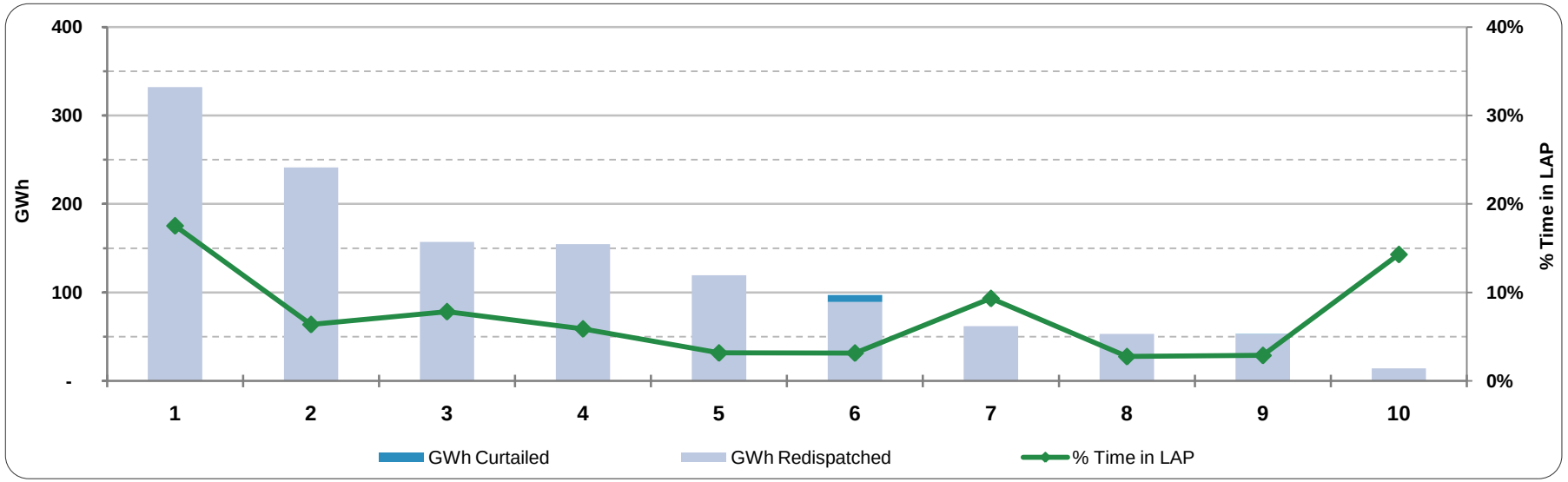
1f. Congestion - by Flowgate (LAP) - 2010



Rank	Flowgate Location (kV)	State	% Time in LAP	GWh Redispatched	GWh Schedules Curtailed	Proposed Solution [estimated completion date]
1	Redgum - Natchez 115 kV FTLO Plantation - Vidalia 115 kV (ELI - EMI)	Louisiana - Mississippi	49.4%	238.8		Utilize operating guide for capacitor bank utilization in the Plantation/Red Gum/ Natchez areas to help minimize reactive power flows on Natchez to Redgum line.
2	Oakridge - Sterlington 115 kV FTLO Perryville - Baxter Wilson 500 kV (ELI)	Louisiana	4.8%	213.2		Install series reactor at Delhi (Spring 2010). Construct new Swartz to Carson SS 115 kV line (2014)
3	PPG - Rose Bluff 230 kV FTLO Nelson - Carlyss 230 kV	Louisiana	5.2%	113.0		No specific project proposed
4	Alchem - Monochem 138 kV FTLO St. Gabriel - AAC Corp 230 kV	Louisiana	3.1%	104.5		Upgrade Alchem to Monochem (2011)
5	Grimes - Mt Zion 138 kV FTLO Grimes - Bentwater 138kV	Texas	3.7%	86.1		Upgrade Grimes-Mt. Zion (2019)
6	Addis - Tiger 230 kV FTLO Dow Meter - Air Liquid 230 kV (EGSL)	Louisiana	13.1%	65.1	0.1	No specific project proposed. Generation redispatch to address QF put.
7	Navasota - Tubular 138 kV FTLO Grimes - Mt Zion 138 kV (ETI)	Texas	4.1%	56.7		No specific project proposed
8	McAdams AT1 500/230 kV ftlo Choctaw Gas - West Point 500 kV	Texas	3.4%	52.8		McAdams Area Upgrades (2011) • McAdams -- add 2nd 500/230 kV auto • McAdams - Pickens 230 kV line upgrade
9	Cow - Colonial Orange 138 kV FTLO Cow Bulk - Sabine 138 kV (EGSL)	Texas	11.4%	32.5	0.7	No specific project proposed. Generation redispatch to address QF put.
10	Mabelvale AT1 500/115 kV FTLO Mabelvale AT2 500/115 kV	Arkansas	3.2%	22.1		Holland Bottoms Project (2011)

SPP ICT

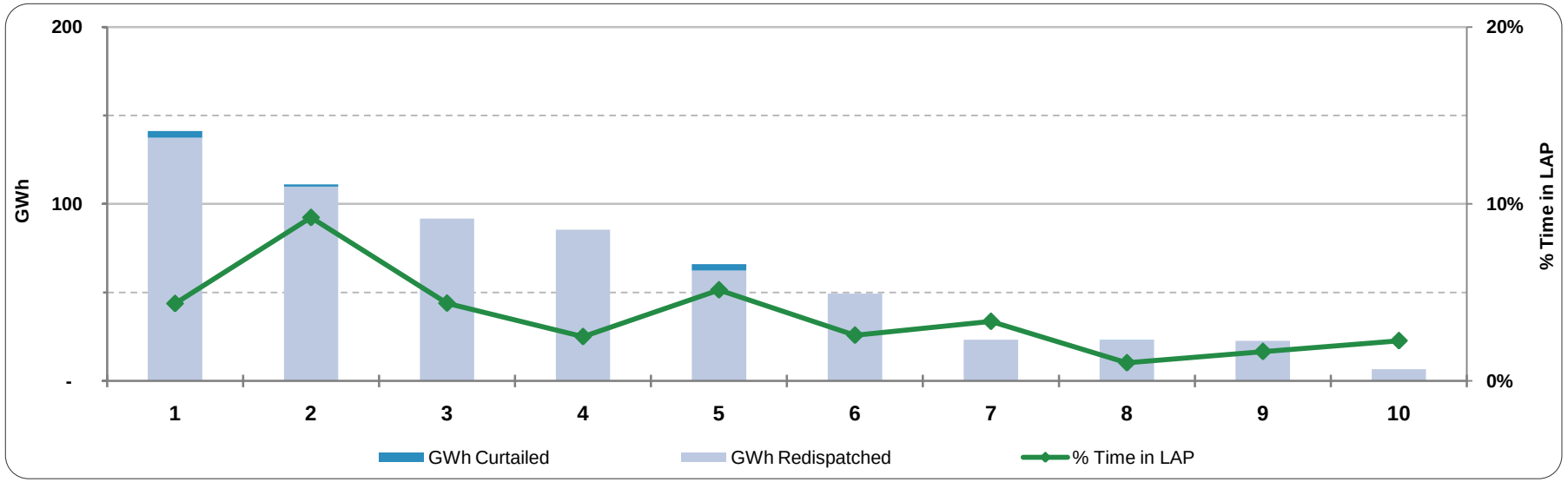
1f. Congestion - by Flowgate (LAP) - 2009



Rank	Flowgate Location (kV)	Operating Company	% Time in LAP	GWh Redispatched	GWh Schedules Curtailed	
1	Grimes - Mt Zion 138 kV FTLO Grimes - Walden 138 kV	ETI	17.5%	332.0		Upgrade Grimes-Mt. Zion (2019)
2	Adams Creek - Bogulsa #3 230 kV FTLO Adams Creek - Bogulsa #2 230 kV	ELI	6.4%	241.4		Adams Creek to Bogalusa Project (Completed)
3	Newport - Fisher 161 kV FTLO Independance - Dell 500 kV	EAI	7.8%	157.2		No specific project proposed
4	Waterford - Little Gypsy #2 230 kV FTLO Waterford - Little Gypsy #3 230 kV	ELI	5.9%	154.6		No specific project proposed
5	Ppg - Rose Bluff 230 kV FTLO Nelson - Carlyss 230 kV	EGSL	3.2%	119.5		No specific project proposed
6	South Jackson - Florence 115 kV FTLO Franklin - Bogalusa 500 kV	EMI	3.2%	89.2	8.0	Upgrade South Jackson to Florence 115 kV Line. (Completed)
7	Addis - Tiger 230 kV FTLO Dow Meter - Air Liquid 230 kV	EGSL	9.3%	61.8		No specific project proposed. Generation redispatch to address QF put.
8	Alchem - Monochem 138 kV FTLO St. Gabriel - Aac Corp 230 kV	EGSL	2.8%	53.2		Upgrade Alchem to Monochem (2011)
9	Oakridge - Sterlington 115 kV FTLO Perryville - Baxter Wilson 500 kV	ELI	2.9%	52.8	0.0	Series reactor at Delhi (Spring 2010). Construct new Swartz to Carson SS 115 kV line (2014)
10	Redgum - Natchez 115 kV FTLO Plantation - Vidalia 115 kV	ELI - EMI	14.3%	14.2		Utilize operating guide for capacitor bank utilization in the Plantation/Red Gum/ Natchez areas to help

SPP ICT

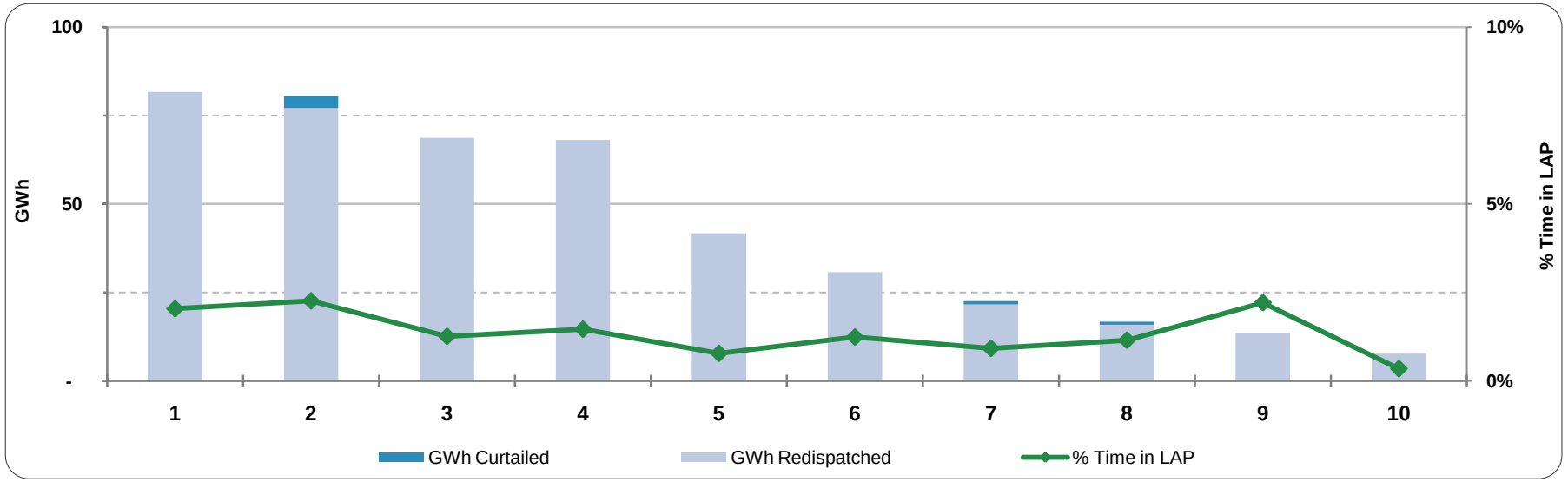
1f. Congestion - by Flowgate (LAP) - 2008



Rank	Flowgate Location (kV)	Operating Company	% Time in LAP	GWh Redispatched	GWh Schedules Curtailed	
1	Oakridge - Sterlington 115 kV FTLO Perryville - Baxter Wilson 500 kV	ELI	4.4%	137.4	3.9	Series reactor at Delhi (Spring 2010). Construct new Swartz to Carson SS 115 kV line (2014)
2	Grimes - Mt Zion 138 kV FTLO Grimes - Walden 138 kV	ETI	9.2%	109.8	1.3	Upgrade Grimes-Mt. Zion (2019)
3	Waterford - Little Gypsy #2 230 kV FTLO Waterford - Little Gypsy #3 230 kV	ELI	4.4%	91.8		No specific project proposed
4	Fancy Auto 500/230 500 / 230 kV FTLO Coly - Mcknight 500 kV	EGSL	2.5%	85.4		No specific project proposed
5	South Jackson - Florence 115 kV FTLO Franklin - Bogalusa 500 kV	EMI	5.1%	62.4	3.6	Upgrade South Jackson to Florence 115 kV Line. (Completed)
6	Adams Creek - Bogulsa #3 230 kV FTLO Adams Creek - Bogulsa #2 230 kV	ELI	2.6%	49.4		Adams Creek to Bogalusa Project (Completed)
7	Addis - Tiger 230 kV FTLO Dow Meter - Air Liquid 230 kV	EGSL	3.4%	23.3		No specific project proposed. Generation redispatch to address QF put.
8	Pelahatchie - Morton 115 kV FTLO Choctaw Gas - West Point 500 kV	EMI	1.0%	22.9	0.1	Upgrade 600 A switches to 1200 A at Morton. (Completed)
9	Panama - Romeville 230 kV FTLO Waterford AT1 500 / 230 kV	EGSL	1.7%	22.7		Amite South Phase 3 (completed)
10	Huntsv - Mtzion 138 kV FTLO Grimes - Walden 138 kV	ETI	2.3%	6.7		Upgrade Grimes-Mt. Zion (2019)

SPP ICT

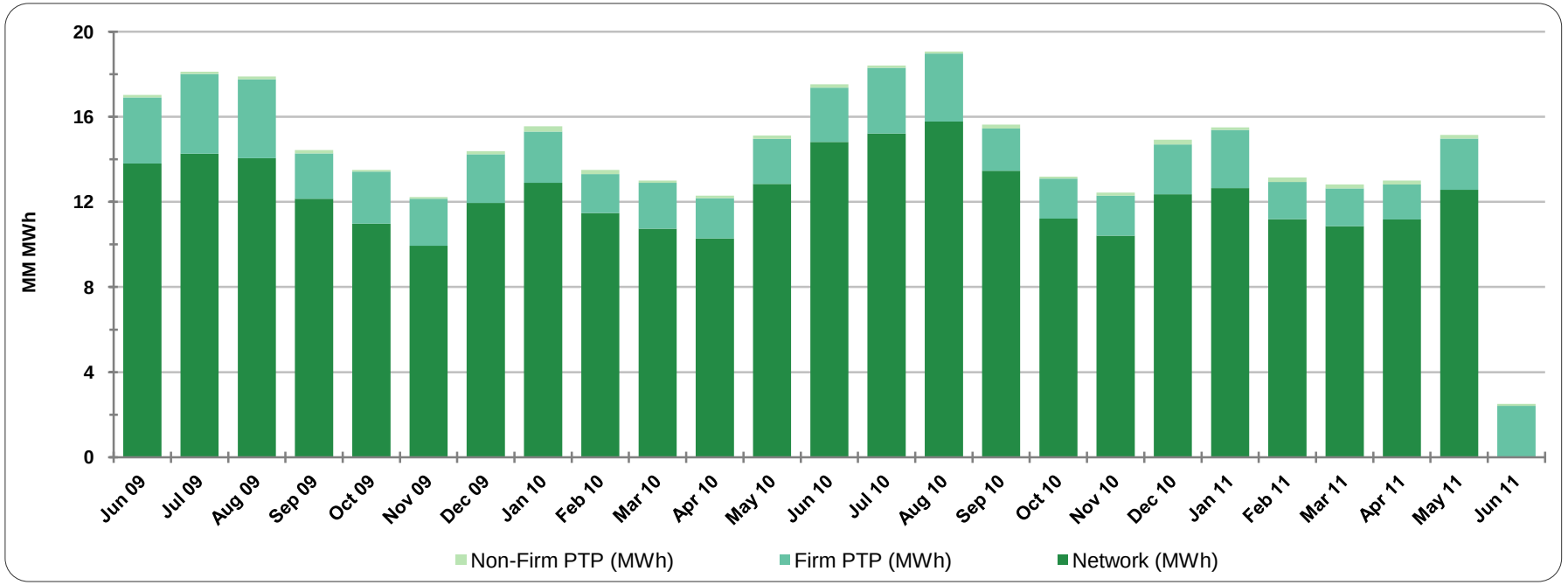
1f. Congestion - by Flowgate (LAP) - 2007



Rank	Flowgate Location (kV)	Operating Company	% Time in LAP	GWh Redispatched	GWh Schedules Curtailed	
1	Brookhaven - Mallallieu 115 kV FTLO Franklin - Bogalusa 500 kV	EMI	2.0%	81.7		Upgrade Brookhaven to McComb (2012)
2	Oakridge - Sterlington 115 kV FTLO Perryville - Baxter Wilson 500 kV	ELI	2.3%	77.1	3.4	Series reactor at Delhi (Spring 2010). Construct new Swartz to Carson SS 115 kV line (2014)
3	Coly - Vignes 230 kV FTLO Willow Glen - Waterford 500 kV	EGSL	1.3%	68.7		AS Phase 2 and 3. (Completed). Coly to Hammond new 230 kV line (2012)
4	Brookhaven - Wesson 115 kV FTLO Grand Gulf - Baxter Wilson 500 kV	EMI	1.5%	68.1		No specific project proposed
5	Mabelvale - Bryant 115 kV FTLO Magnet Cove - Hot Springs 500 kV	EAI	0.8%	41.7		No specific project proposed
6	Hartburg - Inland Orange 230 kV FTLO Hartburg - Cypress 500 kV	ETI	1.2%	30.7		Hartburg to Inland to McLewis Upgrade (2011)
7	Alchem - Monochem 138 kV FTLO St. Gabriel - Aac Corp 230 kV	EGSL	0.9%	21.6	1.0	Upgrade Alchem to Monochem (2011)
8	Waterford - Little Gypsy #2 230 kV FTLO Waterford - Little Gypsy #3 230 kV	ELI	1.2%	15.9	0.8	No specific project proposed
9	Addis - Tiger 230 kV FTLO Dow Meter - Air Liquid 230 kV	EGSL	2.2%	13.6		No specific project proposed. Generation redispatch to address QF put.
10	Sterlington - Oak Ridge 115 kV FTLO Baxter Wilson AT1 500 / 115 kV	ELI	0.4%	7.7		Series reactor at Delhi (Spring 2010). Construct new Swartz to Carson SS 115 kV line (2014)

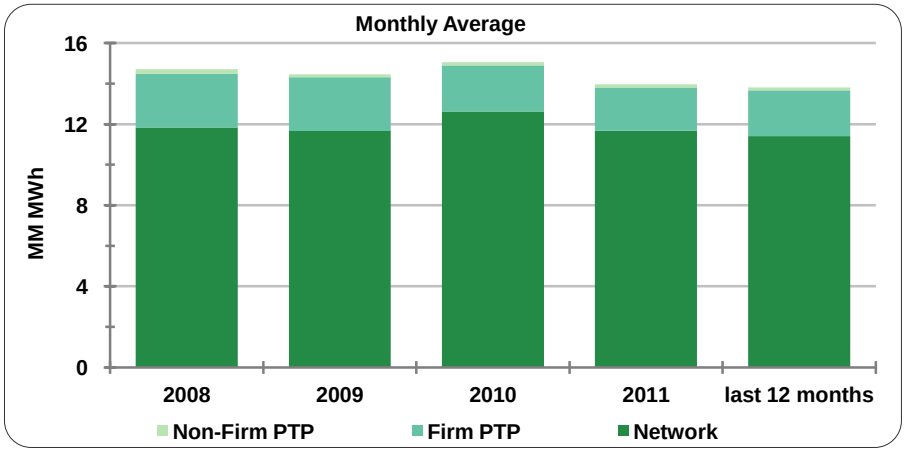
SPP ICT

3b. Tranmission Utilization - MWh



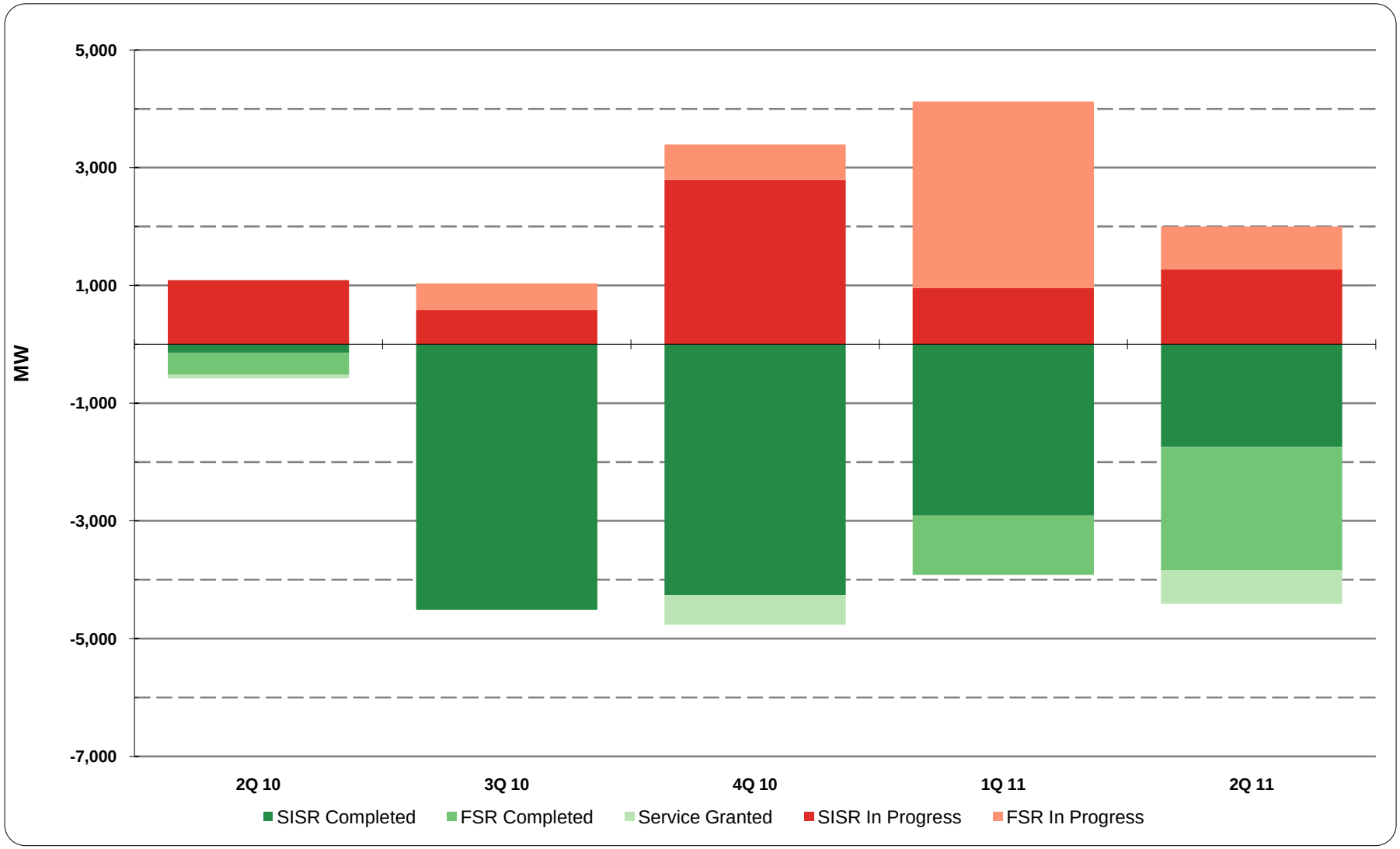
Service (in MM MWh)	Jun 10	Jul 10	Aug 10	Sep 10	Oct 10	Nov 10	Dec 10	Jan 11	Feb 11	Mar 11	Apr 11	May 11	Jun 11
Network	14.82	15.21	15.78	13.46	11.22	10.41	12.36	12.65	11.18	10.86	11.18	12.57	
Firm PTP	2.55	3.10	3.20	1.99	1.87	1.88	2.35	2.73	1.75	1.77	1.64	2.41	2.42
Non-firm PTP	0.15	0.10	0.10	0.19	0.09	0.15	0.22	0.11	0.21	0.19	0.19	0.16	0.10
Total	17.53	18.41	19.07	15.64	13.18	12.44	14.93	15.50	13.15	12.82	13.01	15.14	

Service (in MM MWh)	2008	2009	2010	2011	last 12 months
Network	11.84	11.67	12.63	11.69	11.41
Firm PTP	2.65	2.65	2.28	2.12	2.26
Non-Firm PTP	0.22	0.15	0.15	0.16	0.15
Total	14.71	14.46	15.06	13.97	13.82
	Monthly Average				



SPP ICT

16a. Studies - MW

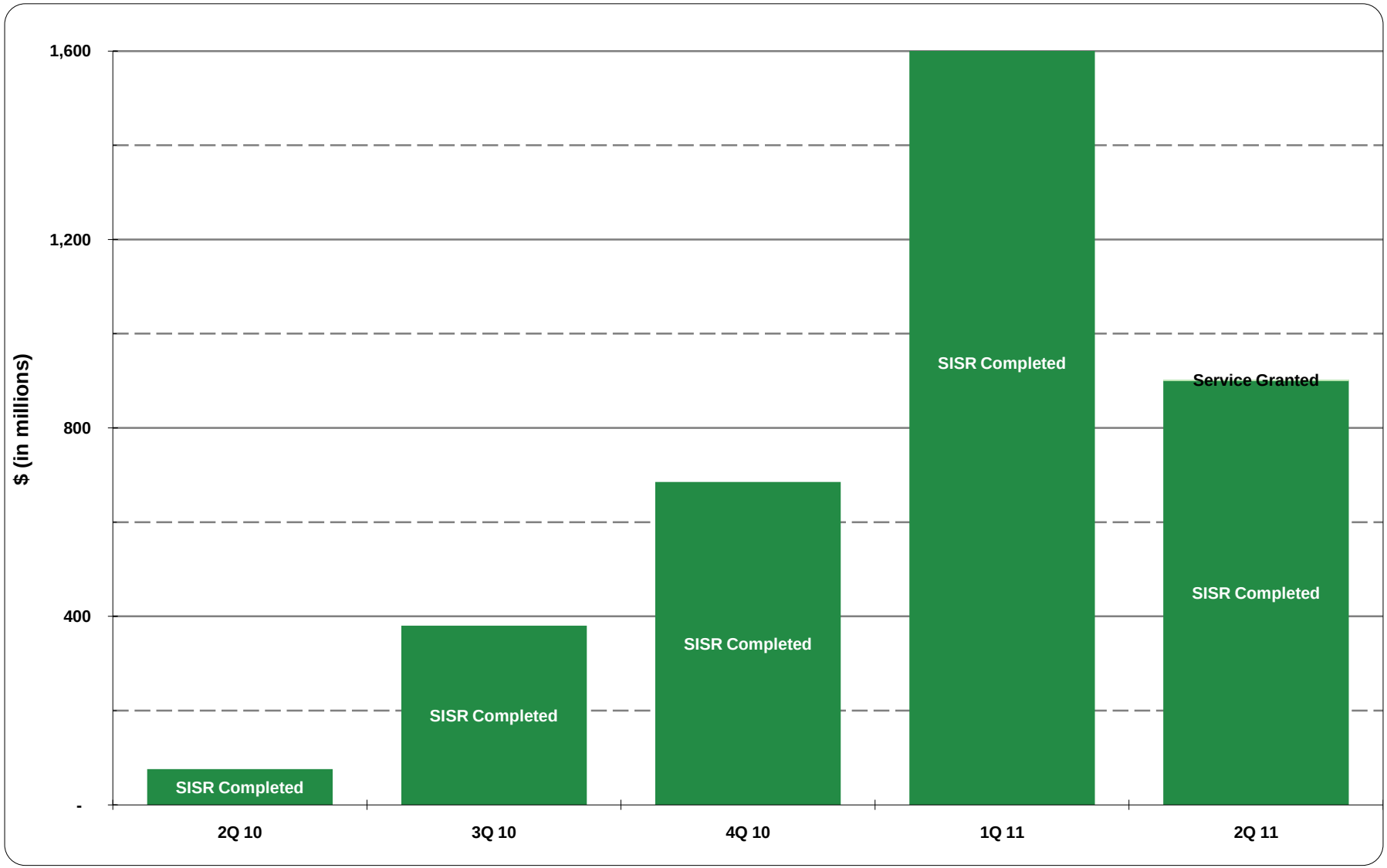


MW					
Completed	**2Q 10**	**3Q 10**	**4Q 10**	**1Q 11**	**2Q 11**
SISR	150	4,511	4,262	2,909	1,743
FSR - service granted	58	-	500	1	570
FSR	370	-	-	1,006	2,098
TOTAL	**578**	**4,511**	**4,762**	**3,916**	**4,411**

MW					
In Progress	**2Q 10**	**3Q 10**	**4Q 10**	**1Q 11**	**2Q 11**
SISR	1,090	583	2,793	956	1,271
FSR	-	451	600	3,171	731
TOTAL	**1,090**	**1,034**	**3,393**	**4,127**	**2,002**

SPP ICT

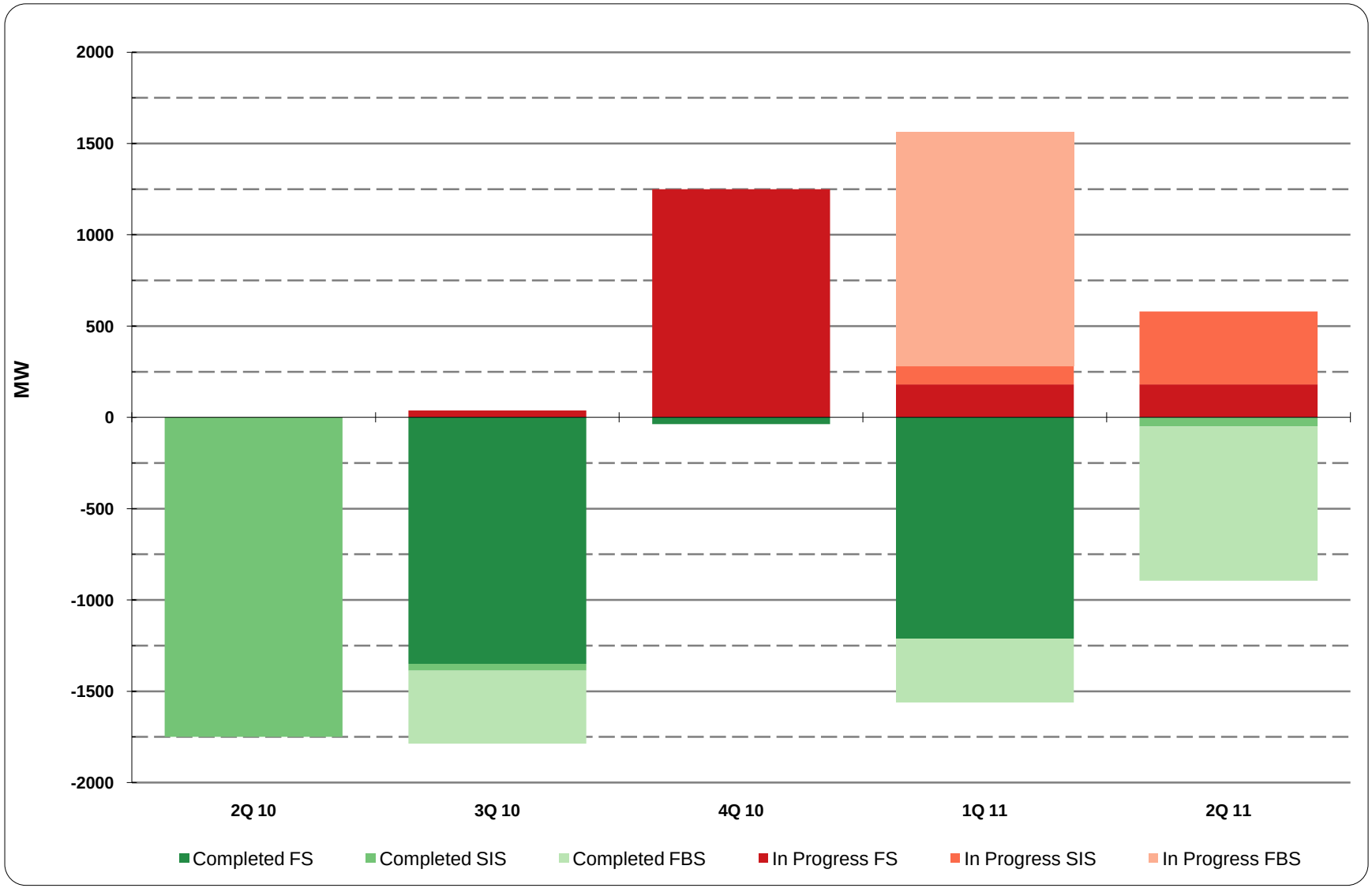
16b. Studies - Upgrade $



Upgrade $ (in millions)					
Completed	**2Q 10**	**3Q 10**	**4Q 10**	**1Q 11**	**2Q 11**
SISR	$ 75.7	$ 380.3	$ 685.4	$ 1,878.3	$ 900.7
FSR - service granted					$ 2.3
FSR					
TOTAL	$ 733.3	$ 450.7	$ 75.7	$ 1,878.3	$ 903.0

SPP ICT

16c. Studies - Generation Interconnection - MW

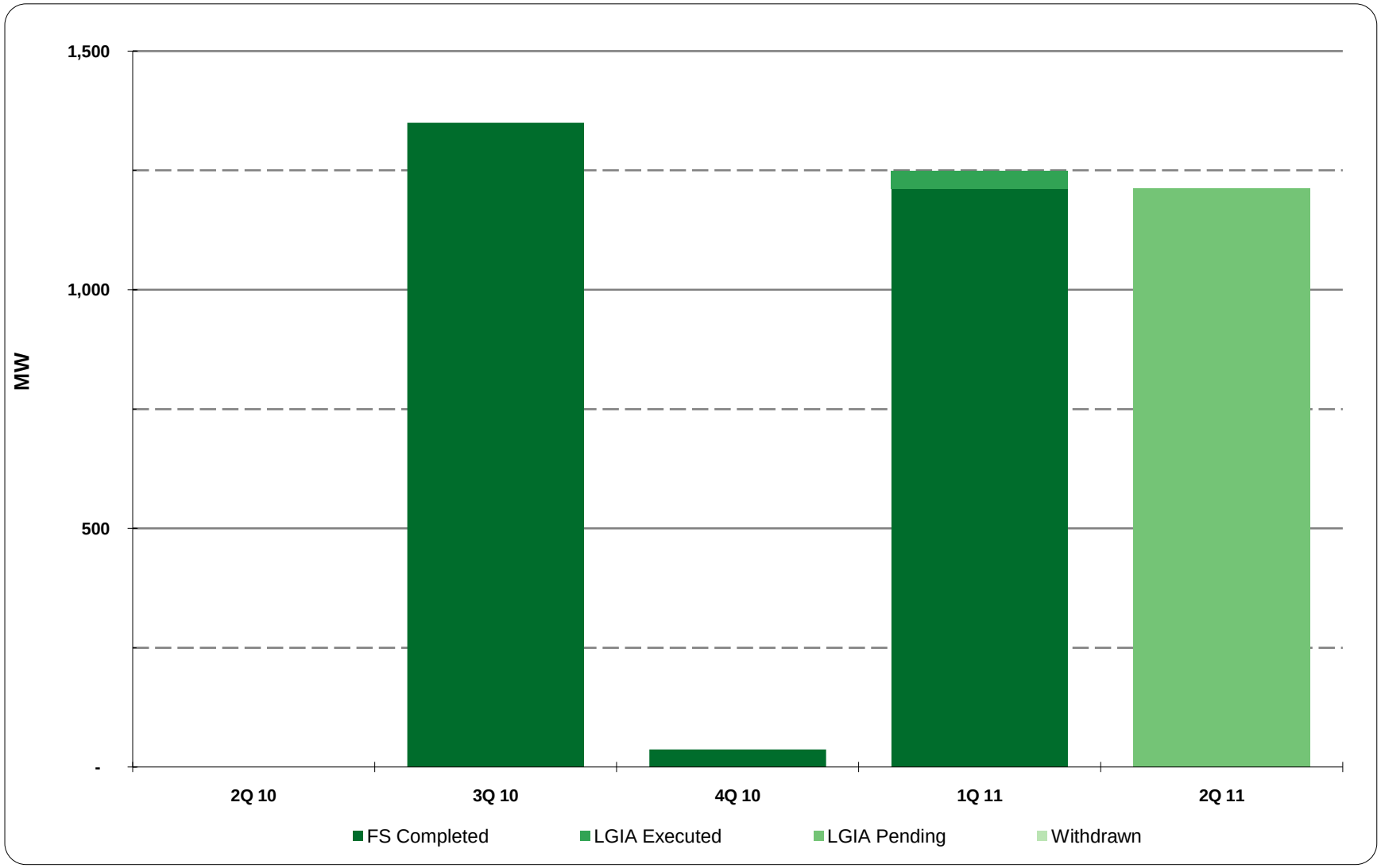


MW					
Completed	**2Q 10**	**3Q 10**	**4Q 10**	**1Q 11**	**2Q 11**
FS	-	1,350	37	1,212	-
SIS	1,750	37	-	-	50
FBS		400	-	350	845
TOTAL	**1,750**	**1,787**	**37**	**1,562**	**895**

MW					
In Progress	**2Q 10**	**3Q 10**	**4Q 10**	**1Q 11**	**2Q 11**
FS	-	37	1,249	180	180
SIS	-	-	-	100	400
FBS	-	-	-	1,282	-
TOTAL	**-**	**37**	**-**	**1,562**	**580**

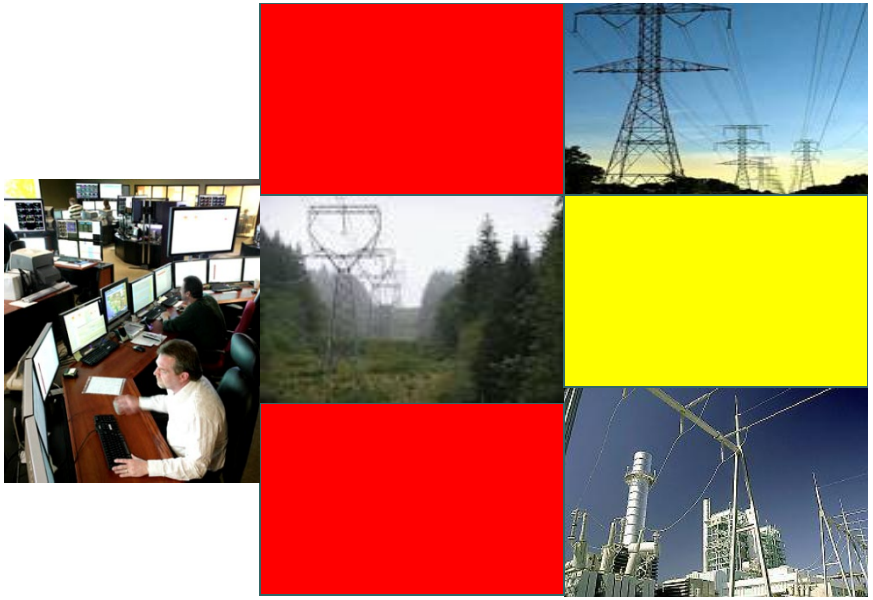
SPP ICT

16d. Studies - Generation Interconnection - FS Completed



MW					
Completed	**2Q 10**	**3Q 10**	**4Q 10**	**1Q 11**	**2Q 11**
FS Completed	-	1,350	37	1,212	-
FS Completed - LGIA Executed	-	-	-	37	-
FS Completed - LGIA Pending	-	-	-	-	1,212
FS Completed - Withdrawn	-	-	-	-	-
TOTAL	**-**	**1,350**	**37**	**1,249**	**1,212**

5-Entergy Stakeholder Policy Committee Update.



Entergy Stakeholder Policy Committee

Update – August, 2011

SPC Activities

- Joint SPC/ERSC WG meeting - June 29
- No major Task Force activity or progress
- Summer focus on reliability.

Concerns - LAPs

- Local Area Procedure: congestion tool implemented by Entergy when the Reliability Coordinator determines that aTLR will not resolve the problem.
- Significant amount of LAPs in July and August.
- 130 LAP event in July and 106 as of August 16
- KGen Hot Springs Example

Hot Springs LAP example

- Hot Springs AT1 500/115kv for the loss of Hot Springs AT2 500/115 kv.
- July: 22 LAPs
- Through August 16: 10 LAPs
- Impact to KGen's Hot Springs facility in Arkansas.
- Hot Springs sold to NRG as firm designated resource for July and August.

Hot Springs LAP 8/1 – 8/8

	8/1/2011			8/2/2011			8/3/2011			8/4/2011			8/5/2011			8/6/2011			8/7/2011			8/8/2011		
HE	SCH	ACT	CUR	SCH	ACT	CUR	SCH	ACT	CUR	SCH	ACT	CUR	SCH	ACT	CUR	SCH	ACT	CUR	SCH	ACT	CUR	SCH	ACT	CUR
1	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
3	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
4	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
5	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
6	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
7	-	-	-	40	40	-	-	-	-	40	40	-	40	40	-	40	40	-	40	40	-	-	-	-
8	40	40	-	225	225	-	-	-	-	225	225	-	225	225	-	225	225	-	225	225	-	-	-	-
9	225	225	-	225	225	-	40	40	-	470	470	-	470	470	-	470	470	-	470	470	-	40	40	-
10	470	470	-	225	225	-	225	225	-	470	470	-	470	470	-	470	470	-	470	470	-	225	225	-
11	470	470	-	470	470	-	470	470	-	600	600	-	600	600	-	470	470	-	470	470	-	225	225	-
12	470	470	-	600	600	-	470	470	-	600	600	-	600	359	241	470	470	-	470	470	-	470	470	-
13	600	575	-	600	600	-	600	600	-	600	388	212	600	267	333	620	300	320	620	300	320	620	383	237
14	600	592	-	600	592	-	600	182	418	600	188	412	600	280	320	620	300	320	620	300	320	620	203	417
15	600	590	-	600	183	417	600	200	400	600	188	412	600	280	320	620	300	320	620	300	320	620	203	417
16	600	512	88	600	180	420	600	200	400	600	188	412	600	280	320	620	300	320	620	300	320	620	203	417
17	600	230	370	600	180	420	600	200	400	600	188	412	600	280	320	620	300	320	620	470	150	620	203	417
18	600	230	370	600	180	420	600	200	400	600	188	412	600	280	320	620	300	320	620	470	150	620	203	417
19	600	230	370	600	180	420	600	200	400	600	188	412	600	280	320	620	300	320	620	470	150	620	203	417
20	600	230	370	600	180	420	600	200	400	600	188	412	600	280	320	620	300	320	620	508	112	620	203	417
21	600	230	370	600	180	420	600	200	400	600	188	412	600	280	320	620	300	320	620	620	-	620	203	417
22	600	230	370	470	200	270	470	200	270	470	200	270	470	300	170	470	300	170	470	470	-	470	203	267
23	470	250	220	470	200	270	470	200	270	470	200	270	470	470	-	470	300	170	470	470	-	470	203	267
24	470	250	220	470	200	270	225	203	22	225	200	25	225	225	-	225	225	-	225	225	-	225	203	22
TOTAL CURTAILED			*2,748*			*3,747*			*3,780*			*4,073*			*3,304*			*3,220*			*1,842*			*4,129*

SCH = Scheduled
ACT = Actual
CUR = Curtailed

Curtailed for LAP
Adjusted due to unit related issues

26,843 MWh Curtailed in Eight Days

Concerns – LAPs

- Major concerns:
  - Uncertainty as to whether the LAP is being implemented fairly and consistently
  - Why the reporting of the LAP levels is not consistent with actual curtailments
  - The reasoning and explanation provided for the LAPs.
  - Role of the ICT after an LAP is declared: coordination between reliability and the tariff desk.
    - The AFC process does not fully capture congestion on the HotSprings auto and allows additional sale of firm service on this flowgate in spite of the continuous LAPs on the flowgate.
  - It appears that, in an LAP, non-firm service within Entergy is not curtailed before curtailing FIRM service.

Concerns – Load Shed Warnings

Entergy has issued 190

Load Shed Warnings since June 1