

NRG Energy, Inc.'s ("NRG's") comments on the DOT tariff language follow. Thanks for the opportunity to submit them.

First, NRG is aware that other organizations intend to submit comments objecting to the lack of a stakeholder process and supporting analysis underlying the need for this proposed tariff modification prior to the release and finalization of the tariff language. NRG will not repeat those comments, but supports them.

Second, NRG offers that that the definition of "Dispatch Operating Point" could be slightly modified as follows: "The expected trajectory of the resource operating point as the resource ramps from one Dispatch Operating Target to the next; the ramping across Dispatch Intervals shall be linear, unless the operational ramp rate of the resource changes during the ramp.

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