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October 14, 2026

Via Electronic Filing

Matthew Homsher, Secretary
PA Public Utility Commission
P.O. Box 3265
Harrisburg, PA 17105-3265

RE: IN THE MATTERS OF Pennsylvania Accelerated Transmission and Energy Redevelopment
(PATER) Study Review Meeting.
Docket Number: M-2026-3059601

Dear Secretary Homsher:

On behalf of NRG Energy, Inc. enclosed please find Comments in response to the Secretarial Letter issued on September 23, 2026, which established October 14, 2026 as the filing deadline for written comments regarding the Pennsylvania Accelerated Transmission and Energy Redevelopment (PATER) Study Preliminary Report filed with the Commission on September 29, 2026.

Please do not hesitate to contact me with any questions.

Sincerely,



Deanne M. O'Dell

DMO/dmc

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Accelerated
Transmission and Energy
Redevelopment

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Docket No. M-2026-3059601

Comments of NRG Energy, Inc.

Date: October 14, 2026

NRG Energy, Inc. (“NRG”) respectfully submits these Comments in response to the Public Utility Commission (“PUC” or “Commission”) Order issued on February 19, 2026 initiating this proceeding, and the Secretarial Letter issued on September 23, 2026, which established a timeline for written comments regarding the Pennsylvania Accelerated Transmission and Energy Redevelopment (PATER) Study Preliminary Report filed with the Commission on September 29, 2026. The Study is intended to assess the need for and impacts of new transmission infrastructure in Pennsylvania. As noted in the PUC Order initiating the proceeding, it will provide an assessment of twenty retired electric generation facility sites as well as existing and needed transmission improvements to improve resource adequacy and increase generation capacity and capability within Pennsylvania.

About NRG Energy, Inc.

NRG is the leading essential home services company offering a unique whole-home experience to millions of North American customers. As a Fortune 500 company, NRG has provided leadership in competitive energy markets by creating a platform that offers consumers more control over their energy use and home automation and protection, especially with its newly acquired tech-forward smart home solutions. NRG serves 8 million customers across North America, including a significant share of retail energy customers in Pennsylvania. NRG has three offices in the Commonwealth to support its substantial investment in serving our customers, in Philadelphia, Pittsburgh and Wyomissing, staffed with hundreds of employees that support our businesses. NRG’s retail energy subsidiaries include Electric Generation Suppliers (“EGSs”) and Natural Gas Suppliers (“NGSs”), which serve customers of all sizes across the Commonwealth.¹

¹ NRG’s licensed retail companies include: Direct Energy Business, LLC (Docket No. A-11025 and A-125072); Direct Energy Business Marketing, LLC (Docket No. A-2013-2368464 and A-2013-2365792); Direct Energy Services, LLC (Docket No. A-110164 and A-125135); Energy Plus Holdings LLC (Docket No. A-20092139745); Gateway Energy Services Corporation (Docket No. A-2009-2137275 and A-2009-2138725); Green Mountain Energy Company (Docket No. A-2009-2139745 and A-2017-2583732); Independence Energy Group LLC d/b/a Cirro Energy (Docket No. A-2011-2262337 and A-2013-2396449); Reliant Energy Northeast LLC d/b/a NRG Home/NRG Business/NRG Retail Solutions (Docket No. A-2010-2192350 and A-2015-2478293); Stream Energy Pennsylvania, LLC (Docket No. A-20102181867 and A-2012-2308991); and XOOM Energy Pennsylvania, LLC (Docket No. A-2012-2283821 and A-2012-2283967).

NRG Energy owns and operates approximately 24.4 GW of power generation capacity across the United States, making it one of the nation's largest competitive power producers. Our diverse fleet includes natural gas, coal, oil, and renewable generation assets located in key wholesale electricity markets. In Pennsylvania, NRG owns and operates approximately 2.4 GW of generation capacity through five natural gas-fired facilities located across the Commonwealth. These assets provide reliable, dispatchable power to the PJM region, support economic development and grid reliability, and position Pennsylvania to meet growing electricity demand associated with advanced manufacturing, electrification, and data center development.

In partnership with RenewHome and Google Cloud, NRG is building what will be one of, if not the largest residential smart-thermostat Virtual Power Plant (“VPP”) in the United States. We are targeting the enrollment of nearly half a million customers in that VPP by the end of the decade. While initially focusing on Texas due to the value its energy-only wholesale market conveys to demand-side resources, NRG ultimately hopes to expand these activities to other regions. PJM represents a marketplace where dispatchable smart thermostats, as part of a VPP, can have substantial value in the face of elevated capacity prices, as well as due to other demand-related charges that EGSs are responsible for, including transmission.²

Preliminary PATER Study

NRG supports the PATER initiative and its effort to create a transparent, data-driven framework for redeveloping deactivated generation sites. PATER Part A establishes a common dataset for 21 fully retired Pennsylvania generation sites totaling approximately 4.8 GW of retired capacity. The study compiles more than 60 attributes per site and uses

² Notably, Pennsylvania and most other PJM states require retailers (EGSs) to be charged the cost of and price into their retail offers both capacity and transmission. In some retail markets, such as Texas, transmission is strictly a pass-through cost. This provides for the possibility that EGSs may design retail products that allow customers to avoid transmission peaks and thus reduce the cost to serve them, offering the potential for additional value sourced from the competitive retail market for demand flexibility beyond what the capacity market itself makes available.

portfolio-level transmission modeling to assess potential for new generation or new load. And it appropriately recognizes that transmission availability, generation adequacy, site conditions, and load growth must be considered together. Importantly, NRG urges the Commission to consider that the local transmission and/or distribution capability may not unlock projected large-load growth on their own. In the study's separate cases, practical generation hosting is approximately 10 GW under realistic dispatch assumptions, while load hosting rises from 0.74 GW with the existing flexible fossil fleet to 9.2 GW in a transmission-only case. This gap means new demand should be evaluated together with credible new supply, capacity accreditation, fuel security, and operating flexibility.

Part B will narrow the portfolio to five to seven sites using refined power-flow analysis, production-cost modeling, multicriteria ranking, site visits, and stakeholder input. NRG recommends that the Commission distinguish technical hosting capacity from commercially deliverable capacity. Site ranking should elevate time to power, as well as interconnection certainty, required network upgrades, capacity accreditation, fuel deliverability, environmental and remediation risk, permitting schedule, site control, equipment availability, customer commitment, and realistic time to commercial operation. Appendix A provides specific recommendations.

NRG also recommends that Part B evaluate multiple configurations for each priority site, including generation, storage, flexible load, and co-located or hybrid arrangements. Those configurations should be modeled transparently, with separate identification of grid impacts, market revenues, customer costs, emissions and permitting requirements, and reliability performance under stressed system conditions.

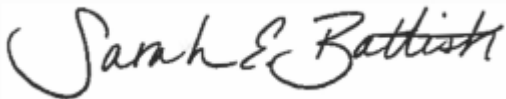
Because the Part A analysis indicates that generation adequacy can constrain load growth before the transmission system reaches its theoretical load-hosting limit, Part B should prioritize measurable reliability outcomes. Relevant metrics should include accredited

capacity, critical-hour availability, response time, duration, fuel assurance, interconnection cost per MW, and time to power.

Importantly, NRG encourages the Commission to utilize a market-based and technology-neutral approach to implementation. The process should use transparent criteria, preserve competitive entry, assign project-specific costs to the projects that cause them, and avoid preferential utility ownership or subsidies that could displace private investment. Where state support is considered, open solicitations and performance-based requirements should be used.

NRG appreciates the opportunity to provide comments on this critical infrastructure review. We are prepared to contribute our expertise in commercial, generation-development, PJM-market, retail-customer, demand-response, virtual-power-plant, and stakeholder-engagement to aid the Commission's efforts. These perspectives can help convert the Part A screening analysis into a portfolio of financeable projects that support Pennsylvania reliability, economic development, customer affordability, and competitive energy markets.

Sincerely,

A handwritten signature in black ink that reads "Sarah E. Battisti". The signature is fluid and cursive, with the first letters of the first and last names being capitalized and prominent.

Sarah Battisti
Senior Director, Government Affairs
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Appendix A

Specific Recommendations to Strengthen Part B

- 1. Separate feasibility from deliverability.** Report technical hosting capacity, site-controlled capacity, queue position, required upgrades, permit status, land control, fuel availability, and likely commercial operation date as distinct fields.
- 2. Make time to power a primary score.** Measure months to site control, completed feasibility, interconnection approval, permits, financing, construction, and commercial operation.
- 3. Add commercial metrics.** Include NPV, levelized fixed cost, expected market revenues, customer-backed revenues, interconnection cost per MW, remediation cost, and downside sensitivities.
- 4. Value reliability correctly.** Include accredited capacity, critical-hour availability, ramp rate, start time, duration, fuel assurance, outage risk, and contribution under High-Level Screening stress scenarios.
- 5. Evaluate integrated configurations.** Test generation-only, load-only, storage, generation-plus-storage, and co-located generation/load cases. Clearly identify market, environmental, and cost-allocation treatment for each.
- 6. Address speculative load risk.** Require evidence of customer readiness, phased energization, financial security, and enforceable curtailment where flexibility is relied upon.
- 7. Strengthen environmental diligence.** Create site-level estimates for remediation scope, flood mitigation, mine subsidence, water availability, air permitting, and environmental-justice considerations.
- 8. Use transparent stakeholder criteria.** Publish weights, scoring definitions, sensitivities, and reasons for selecting the final five to seven sites. Include community benefits and local fiscal impacts without treating public support as a substitute for legal permitting standards.
- 9. Preserve competitive markets.** Avoid utility ownership preferences, socialization of project-specific costs, or subsidies that displace competitive investment. Use open solicitations and technology-neutral performance requirements where state support is considered.