UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION

California Independent System Operator Corporation	**)**	**Docket No. ER15-15-000, --001**

COMMENTS OF THE NRG COMPANIES

IN SUPPORT OF SHORTENED COMMENT DATE

Pursuant to Rule 212 of the Rules of Practice and Procedure of the Federal Energy Regulatory Commission (the "Commission" or "FERC"),[1] the NRG Companies[2] submit these comments in support of the California Independent System Operator Corporation's ("CAISO") October 1, 2014 proposal to amend its tariff provisions regarding recovery of start-up and minimum load costs ("Proposal") and in response to the CAISO's November 25, 2014 response to the deficiency request issued by the Commission on November 6, 2014.

The NRG Companies filed comments on October 22, 2014 in support of the CAISO's attempts to modify its tariff to provide generators an opportunity to recover their start-up and minimum load costs in a market with increasingly volatile natural gas prices. The NRG Companies indicated that the CAISO's Proposal to increase the proxy cost daily bid cap to 125% and to use updated natural gas price data following sharp increases in daily gas prices is a step in the right direction, but only an interim step. While the NRG Companies do not agree with all of the assertions in the CAISO's November 25, 2014 response, the NRG Companies still strongly

[1] 18 C.F.R. § 385.212.

[2] For purposes of this filing, the NRG Companies are NRG Power Marketing LLC and GenOn Energy Management, LLC.

support the Proposal and support the CAISO's request for the Commission to issue a decision on the Proposal by December 9, 2014.

It is imperative that the CAISO implement these new rules as soon as possible. As the NRG Companies explained in its initial comments in this proceeding,[3] NRG incurred millions of dollars in losses due the CAISO's current inflexible start-up and minimum load cost bidding rules in December 2013 and February 2014. While the December 2013 gas event was caused by cold weather in California, the February 2014 gas event was the result of gas being drawn away from California due to cold weather in the eastern part of the United States. Large swaths of the United States have already experienced very cold winter weather and the chance of future gas price spike events is both real and imminent. While the CAISO's proposal is not a permanent solution to all of the issues that plague its markets, it is an important step in the right direction. Thus, the NRG Companies support the Proposal.

For the aforementioned reasons, the NRG Companies respectfully request that the Commission grant the CAISO's request to shorten the comment period to December 2, 2014 and to issue an order that would allow the CAISO to implement its proposed solution at the earliest possible date, but no later than the CAISO's requested date of December 9, 2014.

[3] Comments of the NRG Companies, Docket No. ER15-15 (filed Oct. 22, 2014).

November 26, 2014

Respectfully Submitted,

/s/ Abraham Silverman
Abraham Silverman
Cortney Madea
NRG Energy, Inc.
211 Carnegie Center
Princeton, NJ 08540

Attorneys for the NRG Companies

Certificate Of Service

I hereby certify that I have served a copy of the foregoing document upon each person designated on the official service list compiled by the Secretary in this proceeding.

Dated at Princeton, New Jersey this 26th day of November, 2014.

_/s/ *Abraham Silverman*_____
Abraham Silverman