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**BEFORE THE ENERGY RESOURCES CONSERVATION AND DEVELOPMENT
COMMISSION OF THE STATE OF CALIFORNIA**

Application for Certification for the
Willow Pass Generating Station

Docket No. 08-AFC-6

**TWENTY-EIGHTH STATUS REPORT OF
NRG WILLOW PASS LLC**

December 2, 2013

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In accordance with the Revised Committee Scheduling Order dated September 7, 2012, the applicant in this proceeding, NRG Willow Pass LLC (“Willow Pass”), submits its twenty-eighth status report. The Willow Pass Generating Station is a proposed 550 megawatt natural gas-fired electricity generating facility to be located in Pittsburg, California (“Willow Pass Project”). The Revised Committee Scheduling Order directed parties to continue submitting periodic status reports, reduced in frequency to every four months.

There are no new developments to report since the last status report. As reported previously, NRG remains committed to pursuing the Willow Pass Project and continues to look for opportunities to restart active development. The timing likely depends on the availability of a long-term contracting opportunity that would support financing and construction. The California Public Utilities Commission (“CPUC”) conducts a long-term procurement plan (“LTPP”) process that evaluates the need for new electricity generating capacity to meet reliability needs within the service territories of the three major investor-owned utilities. A new LTPP cycle is expected to commence in 2014 and that process could lead to contracting opportunities for new resources.

The Willow Pass Project is well situated to meet reliability needs in the Greater Bay Area Local Reliability Area. It will be located on a parcel of land that is adjacent to the site of the existing Pittsburg Generating Station. The land is currently owned by a subsidiary of NRG Energy, Inc. (“NRG”), but would be conveyed to Willow Pass. NRG thus holds long-term site control and there are no uncertainties associated with site ownership. The Willow Pass Project also will be adjacent to an existing transmission switchyard and very close to an existing natural gas pipeline, thus avoiding the need to construct significant new interconnection facilities. NRG also holds sufficient emission reduction credits to construct the Willow Pass Project in compliance with applicable air quality laws, ordinances, standards and regulations. The Willow

Pass Project is highly viable and ideally suited to support reliability and meet future needs for flexible generating capacity.

The existing record indicates that no major issues have been identified for the Willow Pass Project. As reported in previous status reports, there is additional work to be done to complete the site investigation contemplated in the staff-approved *Work Plan for Focused Site Investigation and Focused Health Risk Assessment* that was prepared by a consultant to Pacific Gas and Electric Company (“PG&E”), the former owner of the project site, in response to staff’s Data Requests 73 through 75. The work plan provides for collection of soil vapor and groundwater samples and preparation of a focused Health Risk Assessment that includes a Human Health Risk Assessment and a Screening Level Ecological Risk Assessment (“HRA”). At the appropriate time, Willow Pass will work with PG&E to conduct the sampling and prepare the HRA for submission to staff.

When active development restarts, Willow Pass also will provide an updated analysis in all resource areas to facilitate staff’s analysis of the Willow Pass Project, and will be prepared to supply all information needed to complete the certification process and support Commission approval. Willow Pass will continue to keep the Committee informed of progress in future status reports.

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Respectfully submitted,



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