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| Project Title: | Willow Pass Generating Station |
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| Document Title: | NRG Willow Pass LLC Request for Additional Suspension |
| Description: | Request for additional twelve month suspension of proceeding |
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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

**NRG WILLOW PASS LLC
REQUEST FOR ADDITIONAL SUSPENSION**

June 30, 2015

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In accordance with Section 1716.5 of the regulations of the California Energy Commission (“Commission”) and the Order Extending Suspension of Proceedings dated June 10, 2014 (“Suspension Order”), NRG Willow Pass LLC (“Willow Pass”) requests an additional twelve month suspension of this proceeding.

Willow Pass submitted an application for certification for the Willow Pass Generating Station, a 550 megawatt, natural gas-fired electricity generating facility to be located in Pittsburg, California (the “Willow Pass Project”). Willow Pass and its ultimate parent, NRG Energy, Inc. (“NRG”), remain committed to pursuing the Willow Pass Project and continue to seek 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 conducts a biennial long-term procurement plan (“LTPP”) process that typically evaluates the need for new electricity generating capacity to meet reliability needs within the service territories of the three major investor-owned utilities. A future LTPP process could lead to contracting opportunities for new resources such as the Willow Pass Project.

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 another subsidiary of NRG, but would be conveyed to Willow Pass by its affiliate. 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. For these reasons, the Willow Pass Project is a highly viable project that is 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. Further, once active development resumes, Willow Pass 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 additional information that may be needed to complete the certification process and support Commission approval.

Willow Pass asks the Commission to keep the Willow Pass Project in suspension to reflect its continued status as a project that is in development and available for contracting. Any determination that could be construed as a termination or cancellation of the Willow Pass Project would be contrary to the intent of Willow Pass and NRG to continue to pursue its development, and would send the wrong signal to potential buyers of the Willow Pass Project’s output.

Willow Pass appreciates the Commission's consideration of this request. Willow Pass will continue to keep the Commission informed of progress in status reports according to any schedule that may be established.

June 30, 2015

Respectfully submitted,



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