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Energy and Technology Committee

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S. B. 462 - An Act Concerning Power Plant Safety

NRG Energy, Inc. is pleased to provide the following comments on draft bill S.B. 462 - An Act Concerning Power Plant Safety, my name is Jon Gordon, Manager – External Affairs for NRG. NRG is a competitive, wholesale generator in Connecticut with power plants located in Montville, Middletown, Norwalk, Milford, Cos Cob, Torrington, and Branford. NRG operates nearly 2,000 MW in Connecticut, enough power to serve nearly 1/3 of the state or over 1.4 million households.

First, NRG would like to assure the Energy and Technology Committee that safety is NRG's number one priority, and we go to great lengths to adhere to all applicable safety rules, regulations and standards at all of NRG's sites. NRG will continue to ensure that its employees adhere to appropriate safety policies and procedures, including risk identification, quality assurance and overall site safety. These policies and procedures are NRG's most important considerations to mitigate operational as well as any potential construction risks. NRG prides itself on its culture of safety -- in fact, each and every NRG employee meeting begins with a discussion of safety.

Furthermore, NRG requires its independent contractors to adhere to the highest safety standards, including requiring them to maintain third-party safety oversight for major jobs and a prequalification of all workers that includes an assessment of prior safety performance. In addition, NRG maintains its own dedicated staff of safety professionals on site, to ensure its safety procedures are being followed.

Management at all levels is encouraged to make safety part of the daily conversation. To do this, managers and supervisors go into the plants daily to review jobs and discuss hazards and safe behaviors with employees. This regular focus on safety has become an important part of ensuring a safe workplace, and to assess how well the NRG safety policies are actually implemented in the field, NRG conducts a monthly safety assessment. NRG's plants have incorporated the requirements of its Corporate Safety Policies into daily work routines and the overall work environment. When compared to other fossil generators in the Edison Electric Institute Safety Survey, NRG was among the top quartile performers. NRG consistently strives to be among the safest companies in our peer group

NRG also would like to point out that significant safety oversight for all of its generating sites occurs at the federal level through the U.S. Department of Labor - Occupational Safety & Health Administration (OSHA), as well as the National Fire Protection Association (NFPA). In light of the ongoing oversight of OSHA and NFPA, the State safety oversight suggested in S.B. 462 is redundant and unnecessary. Additionally, some of the safety oversight recommendations in this bill could be implemented within Connecticut's existing statutory framework. For example, Section 3 of S.B. 462 calls for the Connecticut Siting Council to conduct a two-phase certification

process to ensure that a facility's safety features will operate as designed. Existing Siting Council processes, which call for applicants to file an operation plan as part of the certification process to be reviewed for compliance by the Council, could easily accommodate additional safety requirements and a review of the efficacy of safety procedures by the Council, without any new legislation.

NRG is willing and ready to work with the Energy and Technology committee on power generation safety going forward and thanks you for the opportunity to provide testimony today.