

**STATE OF NEW JERSEY
BOARD OF PUBLIC UTILITIES**

In the Matter of the Implementation of)	
Executive Order 317 Requiring the)	Docket No. GO23020099
Development of Natural Gas Utility Plans)	

COMMENTS OF NRG ENERGY, INC.

NRG Energy, Inc. (“NRG”) submits comments in the above-captioned proceeding in response to Staff’s Notice issued on July 27, 2023, and subsequent Technical Conference held August 2-3, 2023. NRG appreciates the leadership of the New Jersey Board of Public Utilities (“the Board”) on this topic as determining the future of natural gas will be critical.

WHO WE ARE

Headquartered in Houston, TX, and with an eastern U.S. corporate home in Princeton, NJ NRG is a leading integrated energy and home services company in the U.S. NRG is nationally the third largest provider of residential natural gas services. A Fortune 500 company, NRG is at the forefront of changing how people use, buy, and think about energy. We strive to empower our residential, commercial, and industrial customers with reliable and cost-effective energy solutions. We draw on our deep industry experience to provide products and services that suit our customers' needs with the consistency and innovation expected from the nation’s leading integrated energy and home services provider. Together, we are creating a sustainable energy future by fostering smarter energy choices and providing reliable, cleaner power. NRG’s retail brands maintained one of the largest combined competitive retail energy portfolios in the U.S.

with 155 TWhs of electricity and 1,918 MMDth of natural gas sold in 2022 and over seven million customers served. Our roughly 15,000 employees provide a range of products and services including demand response and energy efficiency, 100% renewable energy, energy plans bundled with smart home technology, as well as loyalty rewards, and charitable giving products through “Choose to Give” plans. NRG has numerous licensed Third Party Suppliers (“TPSs”) that are actively serving electricity and natural gas customers throughout New Jersey since 2002¹. NRG’s retail supply companies have an extensive combined natural gas portfolio amounting to one of the top movers of natural gas in the country.

EXECUTIVE SUMMARY

The decarbonization of the natural gas sector is a monumental effort that will take thoughtful planning and decision making from all stakeholders involved in the process. All the outcomes will have to focus on the customer and ensure costs are kept at bay and disadvantaged communities are treated fairly. The Board has taken the appropriate first steps by convening a technical conference and accepting comments on the topic. The technical conference was well planned and contained panels consisting of many different market participants including experts from other states. It is paramount that the Board continue to have these discussions through meetings and technical conferences. As a TPS in the state, NRG and other suppliers should also

¹ *Reliant Energy Northeast LLC d/b/a NRG Home/NRG Business* ESL-0093 and GSL-0176; *Green Mountain Energy Company* ESL-0233; *Energy Plus Holdings LLC* ESL-0087; *Energy Plus Natural Gas LLC* GSL-0100; *XOOM Energy New Jersey, LLC* ESL-0115 and GSL-0112; *Stream Energy New Jersey, LLC* ESL-0109 and GSL-0120; *Direct Energy Services, LLC* ESL-0078 and GSL-0088; *Direct Energy Business, LLC* ESL-0165 and GSL-0145; *Direct Energy Business Marketing, LLC* ESL-0142 and GSL-0128; and *Gateway Energy Services Corporation* ESL-0166 and GSL-0146.

be part of the planning and discussions as our business in the State is directly impacted by the outcomes of this proceeding.

ALL STAKEHOLDERS, INCLUDING THIRD PARTY SUPPLIERS, NEED TO BE PART OF THE DISCUSSION

NRG and other TPS' need to be not only included in the discussions, but part of the solution. As of June 2023, over 30% of the commercial and industrial natural gas load is served by TPSs.² Therefore, TPSs need to be included in the discussions going forward. While utilities will bear the brunt of the decarbonization efforts, utilities are guaranteed rate recovery while TPSs are not. Similar to what the utilities are contemplating, TPSs also must change our business models to address the changing natural gas market and conduct research into technological developments and product changes that could benefit the industry.

NRG is already offering incentives and products to encourage the decarbonization efforts and would like to be viewed as a strategic partner and ally in continuing these efforts in the State alongside the Board and the utilities. Continuing to develop these efforts in a meaningful manner putting the needs of customers at the forefront while not impacting the reliability of the system will be a challenge for all of us to overcome together.

CONCLUSION

² New Jersey Board of Public Utilities Switching Statistics, June 2023
<https://www.state.nj.us/bpu/pdf/energy/NJ%20Gas%20Switching%20Data%20June%202023.pdf>

NRG applauds Staff for conducting an informative Technical Conference and looks forward to future participation, useful dialogue, and informed decisions on the future of natural gas.

Respectfully submitted,

/s/ Angela Schorr

Angela Schorr

Director

Regulatory Affairs

NRG Energy, Inc.

Angela.Schorr@nrg.com

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