



NRG GRI Index 2011

Strategy and Analysis

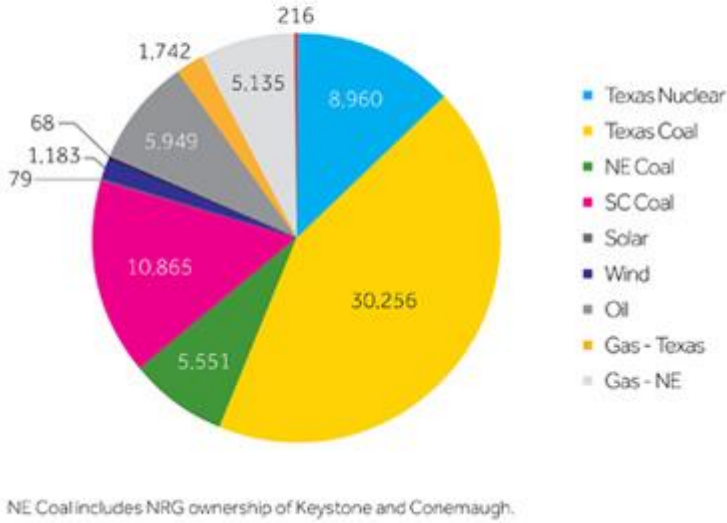
NUMBER	DESCRIPTION	RESPONSE
1.1	CEO Statement	See CEO Statement on page 1 in NRG's 2011 Corporate Responsibility Report
1.2	Key impacts, risks, and opportunities	See pages 2-11 of our 2011 Year In Review and for additional information on risks, see Item 1A starting on page 33 of NRG's 2011 Form 10-K .

Organizational Profile

NUMBER	DESCRIPTION	RESPONSE
2.1	Name of organization	NRG Energy, Inc.
2.2	Primary brands, products, services	See Item 1- NRG's Business Strategy on page 7 of the NRG 2011 Form 10-K for a discussion of our major products and services. For additional discussion of Retail brands see page 4 of our 2011 Year In Review .
2.3	Operational structure	See Our Companies and Our Assets
2.4	Location of headquarters	Princeton, New Jersey
2.5	Countries of operation	United States, Canada, Germany, Australia
2.6	Nature of ownership	NRG Energy, Inc. is an investor-owned corporation trading on the New York Stock Exchange under the ticker NRG. NRG is also listed on the S&P 500.
2.7	Markets served	NRG owns wholesale generation assets in Texas, Louisiana, California, Nevada, New Mexico, Arizona, Illinois, Pennsylvania, Maryland, Delaware, New Jersey, New York, and Connecticut. The Company serves retail electricity

		customers in 16 states including Washington, Oregon, California, Arizona, Texas, Minnesota, Illinois, Ohio, Maryland, Delaware, Pennsylvania, New Jersey, New York, Connecticut, Massachusetts, and Washington, D.C.
2.8	Scale of the organization	The company generated about 71 terrawatt-hours in 2011, a 7% increase from 2010, and serves more than 2 million retail customers. As of Dec. 31, 2011, NRG had 5,193 employees. NRG reported 2011 total revenue of \$9.08 billion. For more information, please see pages 7 through 17 of our 2011 Form 10-K .
2.9	Significant changes in operations—The location of, or changes in operations, including facility openings, closings, and expansions.	<p>Significant changes in 2011 include:</p> <ul style="list-style-type: none"> • Expanded the retail business with the acquisition of Energy Plus • Completed construction of GenConn Middletown gas units (200 MW) • Completed construction of the Princeton Hospital CHP plant • Launched Petra Nova, a wholly-owned subsidiary of NRG, with plans to build a 200 MW-equivalent carbon capture project at the WA Parish plant • Started up Avenal and Roadrunner solar projects (total 45 MW) • Started construction on Ivanpah, California Valley Solar Ranch, and Agua Caliente, solar projects (total of 1,100 MW gross) • Mothballed Indian River Unit 1 coal unit (91 MW)
2.10	Awards received	<p>Awards 2011:</p> <ul style="list-style-type: none"> • NRG – IABC 2011 Silver Quill Award of Excellence for our 2010 Corporate Responsibility Report. • NRG – IABC 2011 Silver Quill Award of Excellence for our 2010 Annual Report featuring our initiative to Move Clean Energy Forward • NRG – IABC 2011 IABC Silver Quill Award of Excellence for the Special Event Launching the eVgo Electric Charging Ecosystem in Texas • NRG – 2011 Green Office Challenge Houston Outstanding Leadership Award • NRG – Connecticut Department of Energy & Environmental Protection GreenCircle Award (awarded in 2011 for 2010 program) • Reliant – CIO Magazine CIO 100 Winners for its innovative Reliant e-Sense™ Weekly Summary Email that provides customers with previously unavailable, personalized information about electricity usage and

		<p>cost. For more information, click here.</p> <ul style="list-style-type: none"> • Reliant – Best Online Newsletter at the 25th Annual American Marketing Association Houston Crystal Awards for its informative online newsletter, energywise, which provides advice on energy efficiency. • Reliant – Houston Mayor Annise Parker declared October 11th Reliant Innovation Avenue Day in Houston • Green Mountain – Austin Chamber of Commerce's 11th annual Greater Austin Business Award for large companies in the Environment category, awarded for demonstrating commitment to environmentally sound practices. For more information, see Green Mountain's Corporate Responsibility Report. • Green Mountain – EPA Green Power Purchaser Awards 2011, Green Power Partner of the Year – Empire State Building, recognizing its commitment to purchase nearly 55 million kilowatt-hours of green power from Green Mountain Energy. • Green Mountain – EPA Green Power Purchaser Awards 2011, Green Power Community of the Year – Portland, Oregon Community – The city joined forces with its local utilities and challenged residents and businesses to support green power through their utility's voluntary program (offering green power from Green Mountain Energy). The challenge was a great success and Portland more than tripled its goal of 1,000 new signups with a total of 3,130 new residential and business customers. • South Texas Project (STP) nuclear plant – B. Ralph Sylvia Best of the Best Award for excellence in operations
EU1	Installed capacity, broken down by primary energy source and by regulatory regime.	See page 10-11 of our 2011 Form 10-K .

EU2	Net energy output broken down by primary energy source and by regulatory regime.	<p style="text-align: center;">NRG Energy 2011 Generation, GWh</p>  <p style="text-align: center;">NE Coal includes NRG ownership of Keystone and Conemaugh.</p>
EU3	Retail customer accounts	Through its retail businesses, NRG served 2.1 million customers in 2011. For more detailed information, see pages 66 and 67 of our 2011 Form 10-K .
EU4	Transmission and distribution lines	Not applicable. NRG does not own nor operate any distribution or transmission.
EU5	Allocation of CO ₂ e emissions allowances or equivalent, broken down by carbon trading framework.	<p>Regional Greenhouse Gas Initiative (United States): In 2011, NRG received an allocation of 715,000 allowances.</p> <p>European Union Emissions Trading Scheme: NRG owns 41.9% in Schkopau Power Plant in Germany, which participates in the EU Emissions Trading Scheme. Allocations and compliance are the responsibility of our partner.</p>

Report Parameters

NUMBER	DESCRIPTION	RESPONSE
3.1	Reporting period	Jan. 1, 2011, to Dec. 31, 2011
3.2	Most recent previous report	June 1, 2011

3.3	Reporting cycle	Annual
3.4	Contact for this report	Any questions related to this report can be directed to NRG's Environmental Business department at 609.524.4983.
3.5	Process for defining report content, including materiality, prioritizing topics and identifying stakeholders.	<p>There are different types of materiality. For the preparation of NRG's financial statements filed with the Securities and Exchange Commission (SEC), the Company applies both quantitative and qualitative materiality thresholds in accordance with SEC Staff Accounting Bulletin 99 in conjunction with the relevant accounting guidance under United States Generally Accepted Accounting Principles (US GAAP).</p> <p>In order to determine environmental materiality, we consider potential impacts to the environment or corporate reputation from our operations. This analysis is used to determine nine environmental key performance indicators (EKPI) by which the plant employees are measured. These are reviewed annually.</p> <p>NRG believes that regular two-way engagement with stakeholders is a fundamental part of good business. To identify material stakeholders, different groups at NRG are accountable for outreach, dialog and soliciting feedback with various stakeholders. See attached chart which lists various stakeholders and accountability. Surveys, focus groups and open dialog are used to determine which issues are most important. We marry these with our own values and business goals. For example, in Safety we use performance tracking, incidents and near misses, paired with root cause analysis to determine what is important. NGOs are typically engaged on an issues basis to identify common ground and areas that require further discussion.</p>
3.6	Report boundary	All U.S. operations, unless otherwise noted
3.7	State any specific limitations on the scope or boundary of the report.	None
3.8	Reporting on other entities	Reporting includes wholly or partially owned businesses or generation assets, including joint ventures and partnerships.
3.9	Data measurement techniques	Quantitative data is collected according to standard industry practice; some is verified by third parties including regulatory bodies and external auditors.

3.10	Corrections to earlier reports	In our 2010 Corporate Responsibility Report, NRG inadvertently reported 13 environmental Notices of Violation received during 2010; the correct number is 14.
3.11	Changes from previous report in terms of scope, boundary, or measurement methods.	No change.
3.12	Standard disclosures table	This listing represents NRG's standard disclosures table.
3.13	Assurance for this report	<p>Select information in NRG's 2011 Corporate Responsibility Report have been either internally or externally verified. Twenty percent of NRG's Scope 1 GHG emissions have undergone an independent third-party audit. Green Mountain Energy engages an independent third party audit firm to conduct a full green portfolio audit annually and independently verify their Scope 1, 2, and 3 GHG emissions. Reliant's REC and offset purchases are internally audited.</p> <p>See also page 111 of NRG's 2011 Form 10-K for KPMG's report of Independent Registered Public Accounting Firm regarding NRG's internal control over financial reporting as of Dec. 31, 2011.</p>

Governance, Commitments and Engagement

NUMBER	DESCRIPTION	RESPONSE
4.1	Governance structure	NRG's board of directors is responsible for directing and providing oversight of the management of the Company's business in the best interests of the shareholders and consistent with good corporate citizenship practices. In carrying out its responsibilities, the board selects and monitors top management, provides oversight for financial reporting and legal compliance, determines the Company's governance principles, and implements its governance policies. The board, together with management, is responsible for establishing the firm's operating values and Code of Conduct and for setting strategic direction and priorities. For more information, see NRG's Corporate Governance Guidelines .
4.2	Chairman of the Board	Mr. Cosgrove has served as non-executive Chairman of the Board and a director of NRG since Dec. 2003.
4.3	Independence of the	As of Dec. 31, 2011, the NRG Board of Directors consisted of

	Board and number of board meetings in 2011	<p>14 members, including one non-executive chairman (Mr. Cosgrove), 11 independent directors, and two non-independent directors (Mr. Crane, the Chief Executive Officer, and Mr. Hobby, whose sister-in-law is a Partner at the Company's independent audit firm).</p> <p>There were 8 Board meetings in 2011.</p>
4.4	Mechanisms for shareholders and employees to provide recommendations or direction to the highest governance body.	<p>Shareholders and employees can communicate with the Board and senior executives in a variety of ways. Shareholders and other interested parties may communicate with the Board by writing to the Corporate Secretary, NRG Energy, Inc., 211 Carnegie Center, Princeton, N.J. Employees are able to question senior staff during quarterly town hall meetings, where executives including the CEO share the status of the financial, operational and environmental performance of the Company.</p>
4.5	Linkage of performance and executive compensation	See pages 42-58 of NRG's Form DEF 14 Proxy Statement published on 03/13/12.
4.6	Avoiding conflicts of interest	NRG's Code of Conduct addresses conflicts of interests.
4.7	Process for determining the composition, qualifications and expertise of the members of the highest governance body and its committees, including any consideration of gender and other indicators of diversity.	See "Size, Compensation and Membership Criteria" on pages 1 and 2 of the NRG Corporate Governance Guidelines and pages 12-14 of NRG's Form DEF 14 Proxy Statement published on 03.12.12.
4.8	Corporate mission and values	<p>NRG's mission is to become the premier energy company of the 21st century for the benefit of our customers, our Company and our country.</p> <p>At NRG, our Core Values provide a framework for all strategies, decisions and behavior. They are the standards by which we STRIVE to conduct our daily business, work with one another and interact within our communities.</p>
4.9	Procedures of the	See page 8 of NRG's Form DEF 14 Proxy Statement published

	highest governance body for overseeing the organization's identification and management of economic, environmental, and social performance, including relevant risks and opportunities, and adherence or compliance with internationally agreed standards, codes of conduct, and principles.	on 03/13/12.
4.10	Performance evaluation of the Board	The Board and each of its committees conduct annual self-evaluations to assess their effectiveness. Individual directors are also evaluated by the Board. In connection with its self-evaluation, each committee reviews its charter. The Governance and Nominating Committee coordinates the Board's self-evaluation.
4.11	Explanation of whether and how the precautionary approach or principle is addressed by the organization.	Risks are assessed by NRG's Risk department and by department heads without specific reference to the precautionary principle.
4.12	Externally developed economic, environmental, and social charters, principles, or other initiatives to which the organization subscribes or endorses.	<p>Since 2008, NRG has been a member of the Electrification Coalition that issued the Electrification Roadmap in 2009. The Roadmap serves as a public policy guide to transforming the U.S. transportation system into one that accommodates and supports electric vehicles.</p> <p>NRG is an active member of the National Climate Coalition (NCC), a multi-sector industry organization focused on devising positive templates for how U.S. Environmental Protection Agency regulation of GHGs could be achieved in the least burdensome, most cost-effective manner. As part of NCC, NRG signed on to principles to inform the EPA on how to set new source performance standards for greenhouse gases under Section 111(d) of the Clean Air Act.</p> <p>Since 2007, NRG has been a member of the U.S. Climate Action Partnership (USCAP), a group of businesses and leading environmental organizations that have come together</p>

		<p>to call on the federal government to quickly enact strong national legislation to require significant reductions of greenhouse gas emissions. In 2009, NRG, along with other USCAP members, signed on to "A Blueprint for Legislative Action," a framework for national climate change legislation.</p>
4.13	Memberships	<ul style="list-style-type: none"> • Agua Hedionda Lagoon Foundation • American Council on Renewable Energy • Association of Electric Companies of Texas • Boys and Girls Club of Carlsbad • Business Environmental Leadership Council (BELC) of the Center for Energy and • Environment Solutions (C2ES) • California Council for Environmental and Economic Balance • California Foundation on the Environment and the Economy • Center for Energy Efficiency and Renewable Technology • City of El Segundo Sustainable Community Initiative (in conjunction with CA Center for Sustainable Energy) • Clean Coal Technology Foundation of Texas • Clean Energy Group • Climate Action Reserve • Coal Utilization Research Council • Electric Drive Transportation Association • Electric Power Supply Association • Electric Power Research Institute • Electrification Coalition • Galveston Bay Foundation • Gulf Coast Power Association • Harbor Association of Industry and Commerce • Heal the Bay (Santa Monica Bay) • Independent Energy Producers of California • Independent Power Producers of New York • Industrial Environmental Association • LA Conservation Corps The SEA Lab • Large Scale Solar Association • National Climate Coalition • New England Power Generators Association • PJM Power Providers • Plug-In-Texas • Semper Fi Wounded Warriors Foundation • Solar Energy Industries Association • Texas Competitive Power Advocates • Texas Renewable Energy Industry Association • Third Way • US Partnership for Renewable Energy Finance • Womens's Energy Network

		<ul style="list-style-type: none"> Western Power Trading Forum
4.14	Stakeholder groups	NRG Stakeholder Profile
4.15	Stakeholder identification and selection	NRG Stakeholder Profile
4.16	Stakeholder engagement	<p>NRG believes that regular two-way engagement with stakeholders is a fundamental part of good business. Different groups at NRG are accountable for outreach, dialog and providing feedback to the business. See the NRG Stakeholder Profile which identifies various stakeholders and the groups within NRG that manage their engagement. Surveys, focus groups and open dialog are used to determine which issues are most important. We marry these with our own values and business goals.</p>
4.17	Use of stakeholder engagement	<p>Since the permitting process began for NRG's Astoria Repowering project in New York City, NRG has worked closely with the Astoria community throughout the DEC permitting process to address the community's concerns about air emissions, traffic and jobs. Based on input from the community, for example, NRG committed to reduce emissions at the existing site, retire existing generation and to use barges during construction to minimize the impact on road traffic. It was this collaborative effort between the community and NRG that has created a project with no opposition and significant support (the Astoria Community Board issued a letter in support of the project; and local environmental groups including Citizens Helping Organize a Kleaner Environment and the National Resource Defense Council support the project).</p>

Economics

NUMBER	DESCRIPTION	RESPONSE
EC Management Discussion		<p>NRG's approach is to effectively make substantial investments in the future of the Company while delivering exemplary financial and operating results in the present. See Economic Responsibility.</p>

EC1	Direct economic value	See page 113 of NRG's 2011 Form 10-K .
EC2	Financial implications of climate change	<p>The impact from legislation or federal, regional or state regulation of GHGs on the Company's financial performance will depend on a number of factors, including the level of GHG standards under any such regulations, the applicability of offsets, and the extent to which NRG would be entitled to receive CO2 emissions credits without having to purchase them in an auction or on the open market. Thereafter, under any such legislation or regulation, the impact on NRG would depend on the Company's level of success in developing and deploying low and no carbon technologies.</p> <p>A portion of our generation is in the Regional Greenhouse Gas Initiative (RGGI) cap-and trade program. Compliance with this program ensures that total emissions from regulated sources do not exceed the program's cap levels. NRG complies with the cap by using early action credits, carbon allowance allocations, and purchasing allowances through the RGGI auction and the secondary market. Innovative regulatory programs like RGGI have the potential to help society reduce GHG emissions at the lowest overall cost, buffer the impacts on consumers and businesses, and stimulate investment in cleaner and more efficient resources.</p> <p>For a full discussion of NRG's climate change risk, see NRG's 2011 Form 10-K, CSR Summary and Carbon Disclosure Project Response.</p>
EC3	Coverage of the organization's defined benefit plan obligations	See "Pensions" on page 124 of NRG's 2011 Form 10-K .
EC4	Significant financial assistance received from government	For discussion of U.S. Department of Energy (DOE) funding for our carbon capture project and DOE guaranteed loans for solar projects, see pages 23 and 90, respectively, of the NRG 2011 Form 10-K .
EC8	Development and impact of infrastructure investments and services provided primarily for public benefit through commercial, in-kind, or pro bono engagement.	<p>NRG donated \$4.6 million to 362 organizations in 2011. NRG committed \$1 million and our development capabilities to construct solar arrays at 20 schools, two fish farms, two micro enterprise centers and a farm with drip irrigation in Haiti. See page 14 of our 2011 Year In Review for more information.</p> <p>In 2011, NRG had commercial partnerships such as Energy Technology Ventures (ETV). NRG partnered with General Electric and ConocoPhillips to form ETV and collectively commit \$300 million to innovative technologies. See page 5</p>

		of our 2011 Year In Review for more information.
EC9	Understanding and describing significant indirect economic impacts, including the extent of impacts.	2,400 jobs were created either directly or indirectly by utility-scale solar projects like Ivanpah, Agua Caliente, and CVSR. See EC8 for additional information.
EU6	Management approach to availability	Safety comes first at NRG. We are committed to meeting the needs of our customers while attaining top decile performance in our industry for both safety and availability.
EU7	Demand Side Management Programs	NRG is not a regulated utility, but Reliant does offer demand response for commercial and industrial customers. This service assists with system load optimization by helping to mitigate potential capacity shortfalls and support system stability. In 2011, large users made available an average of 105 megawatts of demand that could be curtailed in response to emergency conditions.
EU8	R&D activity and expenditure	NRG partnered with General Electric and ConocoPhillips to form Energy Technology Ventures (ETV), which seeks to invest in the most promising emerging clean energy technologies that have the potential to be commercialized. ETV committed \$300 million collectively. Click here for more information.
EU9	Provisions to decommission nuclear sites	NRG is co-owner of the South Texas Project (STP), a nuclear facility near Bay City, Texas. See page 26 of the 2011 Form 10-K for a discussion on decommissioning.
EU10	Planned capacity against projected electricity demand over the long term, broken down by energy source and regulatory regime.	See the Retail Operations section on pages 11-13 of the 2011 Form 10-K .
EU11	Average generation efficiency of thermal plants by energy source and by regulatory regime.	Operating statistics, including Average Net Heat Rate (a measure of thermal efficiency), are reported on page 16 of NRG's 2011 Form 10-K by Region: Texas- 10,300 BTU/kWh, Northeast- 11,100 BTU/kWh, South Central- 9,700 BTU/kWh, and West- 12,400 BTU/kWh.
EU12	Transmission and distribution losses as a percentage of total energy.	Not applicable. NRG does not own or operate any distribution or transmission.

Environment

NUMBER		DESCRIPTION	RESPONSE
EN Management Discussion			Our approach is to lead the industry in a change to cleaner energy and to minimize the impact from traditional electric generating units by 1) repowering our generation fleet with cleaner technologies, and 2) maintaining our existing plants in compliance with environmental regulations while promoting stewardship. Environmental Policy Statement
EN1		Materials used by weight or volume	See EN3 for 2011 fuel quantities.
EN2		Percentage of materials used that are recycled input materials	Fuels used are not recycled. However, NRG uses recycled input materials for office products. For example, in 2011 NRG purchased 53,000 pounds of recycled paper.
EN3		Materials used by weight or volume—fossil fuel usage	Coal: 31 million U.S. tons Gas: 144 billion scf Oil: 20 million gallons of oil
EN4		Electricity purchased for internal use	Electricity purchased: 416 GWh
EN5		Energy saved due to conservation and efficiency improvements.	<p>NRG's power plants, businesses and offices participate in econrg projects focusing on environmental protection and community stewardship. In 2011, 112 econrg projects were completed across our sites, which included energy efficiency projects, tree planting, recycling, water conservation, switching to electric vehicles, switching to CFL bulbs, etc.</p> <p>In 2011, NRG's offices purchased 3.2 million kWh from renewable generation, avoiding 1,600 metric tons of GHGs.</p> <p>See EN7 for more information.</p>
EN6		Energy-efficient or renewable initiatives	<p>At the end of 2011, NRG had a gross 1,100 MW of large-scale solar generation that was either already operating or under construction.</p> <p>The eVgo network created the nation's first comprehensive, privately funded electric vehicle infrastructure of home charging stations and public fast-charging stations, ensuring that EV drivers have complete confidence they will never run out of power on the go. The eVgo network is initially being developed in the Houston, Dallas-Ft. Worth, Washington, D.C.-Baltimore and major California metropolitan areas.</p> <p>Reliant offers a range of plans and options that give customers the tools and ability to better manage their electricity use. The Reliant eSense suite of products gives</p>

		<p>customers insights into their energy use, allowing them to better manage how they purchase and use electricity, potentially reducing use and thus saving money and avoiding emissions.</p> <p>Green Mountain and Reliant offer consumers the choice of electricity products from renewable sources.</p>
EN7	Initiatives to reduce indirect energy consumption and reductions achieved	<p>All our power plants and offices participate in econrg projects including projects related to energy efficiency. In 2011, for example, our Oswego plant saved 93 thousand kWh and \$8,000 (equivalent to 39 metric tons of GHGs) by turning off 84 turbine deck lights that had previously been lit continuously.</p> <p>Other projects across the NRG fleet have included replacing incandescent bulbs with CFLs or LEDs and running water pumps more efficiently.</p>
EN8	Total water withdrawal	<p>Water is a scarce resource in Texas, where NRG maintains water rights for our operating facilities. It is our goal to reduce consumption and protect water availability for our plants and the communities that host them.</p> <p>See Environmental Scorecard on page 9 of the 2011 NRG Corporate Responsibility Report for details regarding water withdrawal in Texas.</p>
EN9	Water sources significantly affected by withdrawal of water	<p>NRG has one location, the Limestone Plant in Jewett, Texas, that withdraws approximately 10% of the annual average volume of its water source, Lake Limestone. The facility maintains compliance with its water withdrawal permit requirements and continually seeks ways to reduce consumption.</p> <p>NRG's Middletown, Conn., facility withdraws water from the Connecticut River, home to the tidewater mucket, which is listed on the state Department of Environmental Protection's (DEP) Natural Diversity Data Base (NDDB).</p>
EN10	Water recycled and reused	<p>econrg project areas include water conservation. In 2011, the WA Parish and Cedar Bayou facilities were able to save 86 million gallons of fresh water through recycling.</p> <p>See Environmental Scorecard on page 9 of the 2011 NRG Corporate Responsibility Report for more details.</p>
EN11	Protected areas and areas of high biodiversity value	See econrg/Conservation and EN13.
EN12	Impacts on biodiversity	See EN13 and EN14

EN13	Habitats protected or restored	<p>About 50,000 acres of wetlands were lost in the Galveston Bay complex over the last 50 years. NRG and its partners have contributed to the restoration of approximately 22,000 of those lost acres. NRG's ecocenter grows and donates the majority of the estuarine wetland plants used to restore wetlands in Galveston Bay. See the GBEP State of the Bay, 3rd edition. In 2011, NRG's ecocenter also provided 451 students across 17 schools with hands-on educational experience.</p> <p>A combined 20,000 acres of desert habitat were purchased and placed in conservation easements in the Southwest U.S. to protect populations of desert tortoise, kit fox, giant kangaroo rat, burrowing owl and golden eagle. The easements are adjacent to or nearby NRG Solar installations.</p>
EU13	Biodiversity of offset habitats compared to the biodiversity of the affected areas	<p>A combined 20,000 acres of desert habitat, consisting of wetlands, streambeds, desert and grassland, was purchased and placed in conservation easements in the Southwest U.S. to protect populations of desert tortoise, kit fox, giant kangaroo rat, burrowing owl and golden eagle.</p> <p>There are no appreciable differences in the habitat or biodiversity quality, other than some offset habitat/biodiversity is better quality than the original (this is verified by the resource agency responsible for issuing species take permits). A conservation endowment is established for all offset habitat for a third party offset habitat management organization to monitor, maintain and improve the habitat.</p>
EU14	Biodiversity strategy	In 2011, NRG developed a biodiversity strategy that incorporates biodiversity at the local level through econrg and at the corporate level with a biodiversity policy statement and developmental goals. NRG generating facilities and offices will prepare and maintain location-specific biodiversity plans.
EU16	Total GHGs by weight	<p>In 2011, NRG emitted 60 million metric tons of CO₂e: United States- 55.3 million, Germany- 2 million, Australia- 2.4 million.</p> <p>See Environmental scorecard, Carbon Disclosure Project and Green Mountain Energy Sustainability Report.</p>
EU17	Other indirect GHGs	NRG offset its 5,600 metric tons from business travel in 2011.
EU18	Initiatives to reduce greenhouse gas emissions and reductions achieved	In 2011, our U.S. GHG emissions were 29% below 2000 levels. In 2011, we made progress towards our intensity goal of 0.45 metric tons/MMBtu by 2025. The 2011 intensity of 0.77 metric ton/MWh is 4% below our 2000 GHG intensity. In 2011, NRG added new efficient gas units such as GenConn

		<p>Middletown, retired Indian River Unit 1, installed renewable generation, and completed operational efficiencies. NRG plans to continue reductions through additional renewable generation, repowering initiatives, and carbon capture and sequestration. A 240 MW-equivalent post-combustion carbon capture demonstration project at NRG's WA Parish plant is planned for 2015.</p> <p>Non-generating unit GHG emission reductions in thousands of metric tons CO₂e:</p> <ul style="list-style-type: none"> • Beneficial reuse of fly ash from Limestone and WA Parish in cement avoided 641,000 metric tons of CO₂e • Purchase of renewable electricity avoided approximately 1,600 metric tons of CO₂e • Purchase of offsets equivalent to scope 3 business travel and scope 1 company-owned vehicles offset 15,000 metric tons CO₂e <p>In addition, NRG's employees contribute to reducing GHGs as well. More than 4,000 volunteer hours were dedicated to environmental activities, including tree planting and paper, plastic and aluminum recycling. Five of our office buildings are LEED certified and our power plants continually seek ways to reduce station service (electric use). In 2011, for example, our Oswego plant saved 93,000 kWh and \$8,000 (equivalent to 39 metric tons of GHGs) by turning off 84 turbine deck lights that had previously been lit continuously.</p>
EN19	Emissions of ozone-depleting substances by weight.	NRG does not maintain this information centrally. Each individual facility complies with its record-keeping requirements regarding ozone-depleting substances.
EN20	NO _x , SO _x and mercury emissions	<p>See page 8 of NRG's 2011 Corporate Responsibility Report for our Environmental Scorecard</p> <p>For a list of NRG's air emissions controls, see page 89 of NRG's 2011 Form 10-K.</p>
EN21	Total water discharge	See Environmental Scorecard for details regarding NRG water discharge in Texas.
EN22	Total weight of waste	<p>Based on reports from NRG's vendor Veolia Environmental Services, NRG generated 10 U.S. tons of hazardous wastes and 63 U.S. tons of non-hazardous wastes in 2011.</p> <p>There were 0 pounds of nuclear waste to land in 2011.</p> <p>In 2011, NRG generated 1.1 million tons of coal ash of which</p>

		<p>56% was beneficially reused.Environmental Scorecard</p> <p>Over 2,000 tons of metal and 6 tons of e-waste were sold instead of landfilled. Selling this material generated more than \$430,000.</p>
EN23	Significant spills	See page 9 of NRG's 2011 Corporate Responsibility Report for our Environmental Scorecard
EN24	Basel Convention/ International transport of hazardous waste.	Of the 10 U.S. tons of hazardous wastes generated by NRG, none was transported internationally.
EN26	Initiatives to mitigate environmental impacts of products and services.	<p>The Company seeks to provide cleaner energy solutions across our operations through repowering and retrofitting. In 2011, the El Segundo repowering project made progress in the construction of a new state of the art natural gas-fueled combined-cycle plant with closed-loop cooling. It replaces a less efficient steam unit with once-through cooling. Indian River Unit 4 was retrofitted with a full suite of emission controls to reduce NOx, SO2, mercury, acid gases and particulate matter.</p> <p>On the retail front, NRG offers customers smart energy choices that enable them to use cleaner energy and take control of their energy use. Reliant offers more than 10 eSense solutions giving customers better control of their energy use and thereby empowering them to reduce their environmental footprint. Green Mountain provides only 100% renewable energy products.</p> <p>eVgo is establishing an electric vehicle charging network that will advance the adoption of EVs, which generally produce a lower level of GHG and other air emissions compared to internal combustion engine vehicles.</p> <p>See our 2011 NRG Responsibility Report for more details.</p>
EN27	Percentage of products sold that are reclaimed.	Not applicable (electricity can not be reclaimed/recycled).
EN28	Non-compliance with environmental laws and regulations.	See page 9 of our Environmental Scorecard .

EN30	Total environmental protection expenditures.	We have invested \$842 million on environmental improvements since 2004 (including \$189 million in 2011) to make our power plants cleaner and are committed to spending an additional \$553 million from 2012 to 2016 to reduce mercury emissions and reduce the impact to fish from once-through cooled plants.
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Human Rights

NUMBER	DESCRIPTION	RESPONSE
Human Rights Management Discussion		NRG is committed to providing a workplace free of discrimination, intimidation and harassment that promotes equal opportunity.
HR1	Percentage and total number of significant investment agreements that include human rights clauses or that have undergone human rights screening.	The majority of our facilities are domestic. In each location, we comply with all federal, state and international laws and regulations applicable to our operations.
HR2	Percentage of significant suppliers that have undergone screening on human rights and actions taken.	NRG's Standard Terms and Conditions requires that suppliers comply with all applicable laws and requirements.
HR3	Employee training on human rights	Annual Code of Conduct Training is required of all employees and includes training on health and safety, workplace violence prevention, equality of employment and harassment free workplace. NRG trains all new hires when they join the Company and requires a signed authorization that new employees have read NRG's Code of Conduct . Each year, all employees are required to take an online refresher course on NRG's Code of Conduct . In 2011, there were 193 hours of employee training on NRG's STRIVE values and 6,086 hours of training on the Code of Conduct .
HR4	Discrimination incidents	NRG employees are guided in their behavior by NRG's Code of Conduct . The Code outlines the fundamental principles of business conduct that NRG employees and directors are expected to follow. The Code translates NRG STRIVE values into standards of expected behavior. The Code entitles employees to a workplace free from harassment. Based on a review of 2011 records, there have been no substantiated incidents of illegal discrimination in 2011.

HR5	Operations identified in which the right to exercise freedom of association and collective bargaining may be at significant risk, and actions taken to support these rights.	We are not aware of any occasions where we have inhibited employees from associating and/or bargaining collectively. We comply with all federal and state laws and regulations applicable to our operations.
HR6	Operations identified as having significant risk for incidents of child labor, and measures taken to contribute to the elimination of child labor.	Due to the nature of operations and the importance we place on Safety, we do not hire employees under the age of 18 years old.
HR7	Operations identified as having significant risk for incidents of forced or compulsory labor, and measures to contribute to the elimination of forced or compulsory labor.	We comply with all federal and state laws and regulations applicable to our operations. In addition, our Code of Conduct is provided to all employees at hire with refresher training annually.
HR8	Percentage of security personnel trained in the organization's policies or procedures concerning aspects of human rights that are relevant to operations.	We comply with all federal and state laws and regulations applicable to our operations. In addition, our Code of Conduct is provided to all employees at hire with refresher training annually.
HR9	Total number of incidents of violations Involving rights of indigenous people and actions taken.	We comply with all federal and state laws and regulations applicable to our operations. In addition, our Code of Conduct is provided to all employees at hire with refresher training annually.

Labor Practices and Decent Work

NUMBER	DESCRIPTION	RESPONSE
LA Management Discussion		Our success depends on having the right people with the

		right skills at the right time to support our future growth. See Future NRG for more information.
LA1	Total workforce	5,193 employees of which about 75% are male and 25% are female.
EU14	Programs and processes to ensure the availability of a skilled workforce.	Future NRG
EU16	Policies and requirements regarding health and safety of employees and employees of contractors and subcontractors.	<p>At NRG, Safety always comes first.</p> <p>Employees: The NRG Safety Manual and Policy is available to all employees on our internal website and in print. The NRG policy and program adheres to the expectations of the Occupational Safety and Health Administration (OSHA) Voluntary Protection Programs (VPP) Policies and Procedures Manual. We have a formal "Safety over Production" Policy that clearly sets the understanding that at NRG Safety <i>always</i> takes precedence over performance.</p> <p>Contractors: The Safety of others on our sites is just as important to us as the safety of our employees. The Contractor Safety Procedure clearly lays out NRG rules and expectations including a zero tolerance rule for specific safety violations.</p>
EU18	Percentage of contractor and subcontractor employees that have undergone relevant health and safety training.	100%. This is a minimum requirement in order for contractors to gain access to NRG plants.
LA3	Benefits provided to full-time employees that are not provided to temporary or part-time employees, by major operations.	The health and welfare of our employees and their families is very important to NRG. NRG provides employees with the following benefits to all full-time and part-time employees who work an average of 20 hours per week: annual incentive plans; medical, dental and vision insurance; pre-tax health spending accountings; employee assistance program; tuition reimbursement; 401(k) retirement plans; paid and unpaid leave; paid personal time off; and paid company holidays. In 2011, NRG provided employees with annual incentive bonuses that totaled \$67.4 million. Benefits are available on the day of hire to all eligible non-represented employees and represented employees where bargained in accordance with the collective bargaining agreement.
LA4	Collective bargaining	28% covered by U.S. bargaining agreements.

	agreements	
LA5	Minimum notice period(s) regarding operational changes, including whether it is specified in collective agreements.	<p>NRG enjoys collaborative and productive relationships with our various unions across the fleet. When operational changes are required, and time permits, we include the union in developing our plans of action for a value added solution. However, we have in our contracts language and an understanding on the part of both parties that it is the responsibility of NRG management to make decisions and direct the business so that we may continue our operations. The scope of our management's responsibility includes setting staffing requirements, the selection of our human resources and the management of our workforce to meet all business needs.</p>
LA6	Percentage of total workforce represented in formal joint management—worker health and safety committees that help monitor and advise on occupational health and safety programs.	<p>90% of the NRG Power Generation facility workforce is represented in formal, facility-level safety committees. An estimated 75-80% of the NRG office workforces, personnel who are not directly associated with a generating facility, are represented in formal safety committees. An increase in the formation of safety committees and enhanced employee involvement at the NRG office locations are key elements of the 2012 NRG Office Safety Initiative. Safety is the fundamental value to NRG's "STRIVE" core values and is included in all employee performance documents.</p>
LA7	Recordable incident rate—Safety	<p>NRG recorded its lowest rate of safety incidents ever in 2011. Safety performance improved significantly as well. NRG's year-end recordable incident rate, 0.77, was in the top decile of the Edison Electric Institute's survey of industry safety results for the second straight year.</p>
LA8	Education, training, counseling, prevention, and risk-control programs in place to assist workforce members, their families, or community members regarding serious diseases.	<p>In 2011, NRG offered discounts on health insurance policies if employees were non-smokers. Also, through our health insurance programs, many services exist that assist employees with chronic health issues to manage their health condition. These programs include health monitoring, 24-hour on call nurse for questions and in some cases free medication and equipment for participants in these ancillary programs.</p> <p>NRG holds safety meetings and morning stretching sessions across our offices and power plants.</p>

LA9	Health and safety topics covered in formal agreements with trade unions.	We have included in all collective bargaining agreements language and practice that addresses maintaining the health and safety of each and every employee, and have in place standard safety practices that drive safety-focused employee behaviors. We have adopted a "Safety over Production" policy that is regularly reviewed with all plant employees and contractors. NRG management and our union members are united in our focus on safety and we collectively support the required use of personal protective equipment (eye and hearing protection; safety shoes) as appropriate for the task.
LA10	Training	In 2011, employees spent 6,086 hours in training on NRG's Code of Conduct and 193 hours training on NRG's STRIVE values.
LA11	Skills management programs	<ul style="list-style-type: none"> • Personal and organizational learning and development • Formal knowledge/learning networks with regular meetings and staff support • Intranet-based knowledge repositories/databases • Intranet-based interactive knowledge platforms integrated into daily work processes • Company university or external comparable education facility • Employee idea management system integrates GRI Programs for skills management and lifelong learning that support the continued employability of employees and assists in managing career endings.
LA12	Percentage of employees receiving regular performance and career development reviews.	100% of salaried employees and represented employees in accordance with their collective bargaining agreement.
LA13	Composition of governance bodies and breakdown of employees per category according to gender, age group, minority group membership, and other indicators of diversity.	See pages 18-25 of NRG's Form DEF 14 Proxy Statement published on March 13, 2012.
LA14	Average salary for female vs. male employees	Wages and salaries are proprietary information. Executive compensation can be found in NRG's latest DEF 14A Proxy Statement .

Society

NUMBER	DESCRIPTION	RESPONSE
SO Management Discussion		Business decisions reflect our commitment to social responsibility, which includes support for our communities through our NRG Global Giving program .
EU19	Stakeholder participation in the decision making process related to energy planning and infrastructure development.	For new energy projects, we conduct public workshops and facilitate public hearings to receive stakeholder/community input on the respective projects. In addition, we work directly with regulatory/resource agencies and community groups in development of these projects to assess opportunities for public benefit attributes to be included in the projects. During construction, dialog continues to ensure issues are addressed. For example, NRG and community members have partnered to develop a landscaping plan for the El Segundo Energy Center.
EU21	Contingency planning measures, disaster/emergency management plan and training programs, and recovery/restoration plans.	NRG has a business continuity plan that provides employees and contractors with information and clear direction in the event of an emergency or disruption at a work location. This includes environmental releases. There are a number of operational policies and procedures in place as well to prevent releases. NRG also has business insurance products to mitigate the financial impacts of environmental risks. In addition, each plant has an Environmental Emergency Preparedness and Response Plan to address any issues. These plans contain clear steps to address the issue and initiate communication and escalation procedures. Per NRG's Environmental Policies and Procedures Manual, each NRG facility conducts routine drills to assure that they are ready to respond.
SO1	Nature, scope, and effectiveness of any programs and practices that assess and manage the impacts of operations on communities, including entering, operating, and exiting.	<p>Certain projects such as large-scale solar projects and NRG's carbon capture demonstration project at WA Parish have standard environmental risk assessment procedures.</p> <p>NRG also engages with stakeholders and communities through public hearings and community meetings.</p>
SO2	Percentage of business units analyzed for risks related to corruption.	100%. Business units are tested in the context of Code of Conduct training wherein all employees are required to verify whether they are aware of any violations of the code (including corruption). In 2011, no material incidents of corruption were reported or discovered.

SO3	Percentage of employees trained in organization's anti-corruption policies and procedures.	100%. Annual Code of Conduct training, which references corruption, is mandatory for all employees. In addition, a subset of employees is further trained with regard to the Foreign Corrupt Practices Act regarding anti-bribery and anti-corruption.
SO4	Actions taken in response to incidents of corruption.	In 2011 no material incidents of corruption were reported or discovered.
SO5	Public policy positions and participation in public policy development and lobbying.	<p>NRG, through our Government and Regulatory Affairs group, advocates for laws and regulations that promote a responsible transition to cleaner forms of generation at the federal, state and local level. Chief among our corporate and policy priorities at NRG is addressing climate change. NRG realizes that society can only achieve the emission reductions needed to avoid climate change by quickly developing and deploying low-greenhouse gas technology in the power and transportation industries, and other sectors worldwide.</p> <p>We believe a U.S. clean energy standard promoting President Obama's goal of generating 80% of America's electricity from clean energy sources by 2035 will lead America to the greenhouse gas emissions reductions necessary to prevent catastrophic climate change. This policy will jump-start the adoption of CO2 capture and sequestration, nuclear, promising renewables, high efficiency natural gas generation and other technologies. We are tireless advocates for sustainable energy and are tailoring the future development of our portfolio for success in a carbon-constrained world.</p> <p>If designed well, energy policies can also spur the adoption of electric vehicles, which could be a tremendous tool to reduce greenhouse gas emissions. Electric vehicles have the potential to reduce emissions from the transportation sector and drive Americans' demand for clean energy technologies to power their EVs, all while having the added side benefit of reducing our dependence on foreign oil. NRG CEO David Crane in May 2011 testified before the Senate Committee on Energy and Natural Resources on sensible, low cost policies to incentivize electric vehicle adoption. NRG has also advocated on the local, state and federal level for policies that reduce unnecessary permitting burdens and other barriers to the development of solar at homes, businesses and large-scale facilities.</p>
SO6	Total value of financial and in-kind contributions to political parties,	<p>\$134,275 in political contributions from NRG in 2011.</p> <p>In addition, the NRG PAC, funded by employees, contributed a total of \$152,950 in 2011.</p>

	politicians, and related institutions by country.	
SO7	Total number of legal actions for anticompetitive behavior, anti-trust, and monopoly practices and their outcomes.	All material litigation is disclosed in NRG's 2011 Form 10-K in Note 22-Commitment & Contingencies (starting on page 183).
SO8	Monetary value of significant fines and total number of non-monetary sanctions for noncompliance with laws and regulations.	All material litigation is disclosed in NRG's 2011 Form 10-K in Note 22-Commitment & Contingencies (starting on page 183).

Product Responsibility

NUMBER	DESCRIPTION	RESPONSE
PR Management Discussion		Safety comes first at NRG. For information regarding the safe use of electricity, see Energy Safety .
EU23	Programs, including those in partnership with government, to improve or maintain access to electricity and customer support services.	<p>For information regarding Reliant's initiatives to help low-income and fixed-income customers, see Energy Assistance. In addition, Reliant offers a variety of payment methods including check, credit card, bank draft, web pay and walk-up payments. Reliant offers to assist customers in finding an agency that can assist them if they cannot pay their bills.</p> <p>In addition, Reliant eSense™ smart energy solutions, an innovative suite of tools, gives Reliant customers new insight into their electricity use and the power to make informed decisions that can save energy and money.</p>
EU24	Practices to address language, cultural, low literacy and disability related barriers to accessing and safely using electricity and customer support services.	Reliant customers choose to receive their information in either English or Spanish. The Reliant website is available in both languages; Spanish speaking customers receive bills and other information in Spanish, and their calls to the Customer Care department are routed to bilingual agents. Reliant provides support through telephone, email, web chat and mail, depending on the time sensitivity of the issue and communication method our customers prefer.
PR2	Total number of	Not applicable. NRG does not manufacture products subject

	incidents of non-compliance with regulations and voluntary codes concerning health and safety impacts of products and services during their life cycle, by type of outcomes.	to mandatory or voluntary codes.
EU25	Number of injuries and fatalities to the public involving company assets, including legal judgments, settlements and pending legal cases of diseases.	All material litigation is disclosed in NRG's 2011 Form 10-K in Note 22-Commitment & Contingencies (starting on page 183).
PR3	Type of product and service information required by procedures, and percentage of significant products and services subject to such information requirements.	For each product, Reliant provides an Energy Fact Label (EFL) that describes the detail of the product, including: term length, price, early cancellation fee, mix of fuel type (fossil, renewable), etc. Reliant also provides Terms of Service and Customer Rights.
PR5	Customer satisfaction	Reliant has implemented an initiative developed by the Customer Contact Council to measure "customer effort" as a metric for successful customer engagement, in addition to "customer satisfaction." This metric focuses sharply on the customer experience by working to reduce the effort expended by the customer rather than the more subjective evaluation of their own satisfaction. Reliant had a customer effort score 26% better than its peers and was profiled in the Harvard Business Review for its efforts.
PR6	Programs for adherence to laws, standards, and voluntary codes related to marketing communications, including advertising, promotion, and	Green Mountain customers receive product content labels for their renewable electricity products, as required by applicable state laws and regulations. These labels display the percentages and types of renewable energy put on the grid on behalf of the customer. Furthermore, Green Mountain voluntarily performs an audit to make sure actual renewable energy purchases match product content label claims, and

	<p>sponsorship.</p>	<p>publishes the audit report on its website.</p> <p>Reliant has a rigorous approach to ensuring adherence. Periodic training is provided by lawyers on advertising law and regulatory compliance. All product and campaign launches must submit materials to a Creative Review Board that reviews and approves marketing, advertising, and correspondence in advance of launching to ensure compliance with all legal and regulatory standards. In addition, internal brand standards have been developed to ensure all marketing and advertising are consistent with NRG core values.</p>
PR9	<p>Monetary value of significant fines for noncompliance with laws and regulations concerning the provision and use of products and services.</p>	<p>There were no material fines for noncompliance with laws and regulations concerning the provision or use of products or services.</p>
EU26	<p>Percentage of population unserved in licensed distribution or service areas.</p>	<p>Not applicable. NRG does not own nor operate any distribution or transmission and is not a regulated utility.</p>
EU28	<p>Power outage frequency</p>	<p>Not applicable. NRG does not own or operate any distribution.</p>
EU29	<p>Average power outage duration</p>	<p>Not applicable. NRG does not own or operate any distribution.</p>
EU30	<p>Average plant availability factor by energy source and by regulatory regime.</p>	<p>Operating statistics, including Annual Equivalent Availability Factor, are reported on page 16 of NRG's 2011 Form 10-K by Region: Texas- 88.2%, Northeast- 87.2%, South Central- 89.9%, and West- 88.5%.</p>