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Gavin J. Donohue, *President &
Chief Executive Officer*

February 11, 2009

Mr. Andrew Stuyvenberg
Environmental Project Manager
Division of License Renewal, Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Mail Stop: O-11F1
Washington, DC 20555-0001

Dear Mr. Stuyvenberg:

The Independent Power Producers of New York, Inc. (IPPNY) is a trade association representing the competitive power supply industry in New York State, including companies involved in the development of electric generating facilities, the generation, sale, and marketing of electric power, and the development of natural gas facilities. IPPNY's members generate almost 75 percent of New York's electricity using a wide variety of generating technologies and fuels, such as nuclear, hydro, wind, coal, oil, natural gas, and biomass. IPPNY's mission is to assist its member companies in becoming the premier providers of electricity in New York State. In furtherance of our mission, IPPNY is committed to advocating fair and efficient competition among wholesale and retail suppliers of electricity and other competitive electric resources.

IPPNY believes that Entergy's Indian Point nuclear facility is a positive asset for the State of New York and for its millions of residents, and we support the continued operation of Indian Point as a critical component of the state's energy supply system. Attempts to close Indian Point would have a devastating impact, when you consider both the role the site plays in supplying 2,000 megawatts of non-emitting electricity to the Lower Hudson Valley and New York City as well as the stability the facility brings to the grid (due to its size, scope and infrastructure).

Indian Point provides 18 to 38 percent of the lower Hudson Valley's and New York City's power, making it a vital source of energy for the entire state. As New York's energy demand continues to grow, so does the importance of Indian Point. Two million homes and businesses, as well as train and subway lines, major health providers and municipal systems, depend on Indian Point's reliable, carbon-free, low-cost power.

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Since purchasing the Indian Point Energy Center, Entergy has been a leader in the energy marketplace to the benefit of energy users throughout the state. Entergy has invested hundreds-of-millions of dollars necessary to run the facility in a proper and safe manner. Through Entergy's considerable efforts, Indian Point is a "base-load" power plant that is capable of supplying electricity 24 hours a day, 7 days a week, 365 days of the year; this availability rate is a far cry from the times of more than 90 day outages, which played havoc with grid reliability. Indeed, according to a report by The Analysis Group, competition in the wholesale power industry has resulted in an eleven percent increase in nuclear plant power output.

In providing this vital and necessary source of energy, Indian Point does not contribute to the local air emissions. Continued reliance on non-emitting generating sources, such as nuclear power, is an essential component of a responsible strategy to avoid and reduce emissions that lead to climate change. Indeed, energy modeling that forms the basis for the Regional Greenhouse Gas Initiative assumes that existing nuclear facilities, such as Indian Point, will continue to operate. Clearly, nuclear energy from Indian Point is essential to holding current emission levels constant and keeping emissions low in the future. Specifically, the continued operation of Indian Point avoids increased emissions that would result otherwise, such as almost 14 million tons of carbon dioxide, over 75 thousand tons of sulfur dioxide, more than 23 thousand tons of nitrogen oxides, in excess of a thousand tons of carbon monoxide, and 145 tons of volatile organic carbon. All around the world, countries such as India, England and China are building nuclear power plants to reduce their carbon footprints, while providing the amounts of electricity each country needs for their growth. Why would we want to take the reverse action here?

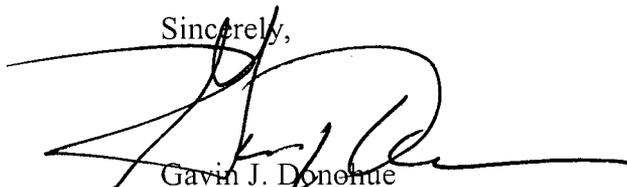
According to the New York Independent System Operator, the closure of Indian Point "would cause an immediate violation of reliability standards." Reliable electricity is critically important to New York's future, and nuclear energy is a reliable, affordable component of our state's diverse fuel mix. Indian Point should continue to play a role in the state's energy plan now and well into the future. We cannot afford to lose any of the vital existing generating capacity that the Indian Point provides.

The closure of Indian Point would lead to a giant gaping hole in the availability of low-cost power to New Yorkers. When you match the loss of 2,000 megawatts with the fact that New York State has the country's second highest retail prices for electricity, behind only Hawaii, the consequences of eliminating the plant would lead to runaway pricing, as well as rolling brownouts and blackouts – a harsh reality many recent studies have indicated would result, and those studies were concluded before the current economic crisis. Without Indian Point's 2,000 megawatts, energy costs would rise over an estimated \$1 billion a year in the New York area. In fact, wholesale prices could spike as high as 40 percent.

Closing Indian Point also would have a significant impact on the local economy. Indian Point provides thousands of high-paying, skilled, full-time, part-time and contract jobs and generates more than \$100,000,000 million in annual cumulative payroll and local purchases. Overall, Indian Point provides more than \$750 million in economic activity throughout the five counties surrounding the site and comprising the lower Hudson Valley, as well as over \$1 billion in economic activity to New York State.

IPPNY believes that not relicensing the Indian Point Energy Center is simply unworkable, in the context of the critical electricity outlook facing the City of New York and the lower Hudson Valley over the next several years. We could not afford to lose Indian Point yesterday. We cannot afford to lose Indian Point today, and we certainly are not able to afford to lose Indian Point tomorrow. Thus, IPPNY strongly supports the relicensing of the Indian Point Energy Center for another 20 years. In addition, I respectfully request your continued dedication to having a decision rendered in a reasonable timeframe for the sake of the people of New York State, in light of our dependence on this important energy asset.

Sincerely,

A handwritten signature in black ink, appearing to read 'Gavin J. Donohue', written over the word 'Sincerely,'.

Gavin J. Donohue
President & CEO