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VIA HAND DELIVERY

U.S. Securities and Exchange Commission
Division of Corporation Finance
Office of Chief Counsel
100 F Street
Washington, DC 20549

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2007 JAN 16 PM 5:24
OFFICE OF CHIEF COUNSEL
DIVISION OF CORPORATION FINANCE

Re: Reliant Energy, Inc. – Omission of Stockholder Proposal of Seneca Capital, L.P.

Dear Sir or Madam:

Pursuant to Rule 14a-8(j) under the Securities Exchange Act of 1934, as amended (the “Exchange Act”), Reliant Energy, Inc., a Delaware corporation (the “Company”), is hereby submitting this letter to respectfully request that the Staff of the Division of Corporation Finance (the “Staff”) of the Securities and Exchange Commission (the “Commission”) concur with the Company’s view that, for the reasons stated below, the stockholder proposal and supporting statement thereof (the “Proposal”) submitted by Seneca Capital, L.P. (the “Proponent”) may properly be omitted from the proxy materials (the “Proxy Materials”) to be distributed by the Company in connection with its 2007 annual meeting of stockholders (the “2007 Annual Meeting”). The Proposal and all related correspondence are attached hereto as Exhibit A.

The Company expects to file its definitive Proxy Materials with the Commission on or about April 6, 2007. Pursuant to Rule 14a-8(j), enclosed herewith are six (6) copies of this letter and Exhibit A. Pursuant to Rule 14a-8(j), this letter is being filed with the Commission no later than eighty (80) calendar days before the Company files its definitive 2007 Proxy Materials with the Commission. On behalf of the Company, we hereby agree to promptly forward to the Proponent any Staff response to this no-action request that the Staff transmits by facsimile to the Company only.

I. The Proposal

On December 18, 2006, the Company received the Proposal for inclusion in its Proxy Materials. The text of the Proposal is reprinted below as it was submitted to the Company:

RESOLVED, that pursuant to Section 109 of the Delaware General Corporation Law, 8 Del. C. § 109, the stockholders of Reliant Energy, Inc. ("Reliant Energy" or the "Company") hereby amend Article III of the Company's Bylaws by adding a new Section 5 and renumbering the existing Sections 5 through 11 as Sections 6 through 12:

Section 5. Proxy Access For Certain Candidates Nominated by Stockholders. Notwithstanding any other provision of these Bylaws to the contrary, the Company shall include in its proxy materials for a meeting of stockholders the name, together with the Disclosure and Statement (both defined below), of any person nominated for election to the Board of Directors by a stockholder or group thereof that satisfies the requirements of this Section 5 (the "Qualified Nominator"), and allow stockholders to vote with respect to such nominee on the Company's proxy card for that meeting. Each Qualified Nominator may nominate one candidate for election at a meeting.

To be eligible, a Qualified Nominator must:

(a) have beneficially owned 3% or more of the Company's outstanding common stock (the "Required Shares") continuously for at least one year;

(b) provide written notice received by the Company's Secretary within the time period specified in Section 4 of Article III of the Bylaws containing (i) with respect to the nominee, (A) the information required by Items 7(a), (b) and (c) of SEC Schedule 14A (such information is referred to herein as the "Disclosure") and (B) such nominee's consent to being named in the proxy statement and to serving as a director if elected; and (ii) with respect to the Qualified Nominator, proof of ownership of the Required Shares; and

(c) execute an undertaking that it agrees to (i) assume all liability of any violation of law or regulation arising out of the Qualified Nominator's communications with stockholders, including the Disclosure (ii) to the extent it uses soliciting material other than the Company's proxy materials, comply with all laws and

