

**FEDERAL ENERGY REGULATORY COMMISSION
OFFICE OF MARKETS, TARIFFS AND RATES
Washington, DC 20426**

Dated: May 21, 2002

To: Sellers of Wholesale Electricity and/or Ancillary Services in the United States Portion of the Western Systems Coordinating Council During the Years 2000-2001 (Listed on Attachment A).

From: Donald J. Gelinas
Associate Director
Office of Markets, Tariffs and Rates

Re: **Fact-Finding Investigation of Potential Manipulation of Electric and Natural Gas Prices, Docket No. PA02-2-000**

Pursuant to the Commission's order issued February 13, 2002, in the above-referenced proceeding, you are hereby ordered to respond to the following data request, including requests for admissions with respect to certain trading strategies that your company may have engaged in. The data request is being issued to all sellers of wholesale electricity and/or ancillary services in the United States portion of the Western Systems Coordinating Council (WSCC) during the period 2000-2001. The data request is being posted on the Commission's web page for Docket No. PA02-2-000 and, in addition, is being sent by e-mail to a representative of the designated companies.

On April 2, 2002, in response to the request by Commission staff of March 5, 2002, all jurisdictional and non-jurisdictional wholesale sellers in the United States portion of the WSCC reported certain historical information (specified in an Excel spreadsheet template) on both physical and financial transactions for calendar years 2000 and 2001. The responses submitted indicate that the financial transaction data were not reported in a consistent manner, so that it cannot be used to identify so-called "wash," "round trip," or "sell/buyback" type transactions. Accordingly, the present follow-up data request is necessary.

Your company's response is to be signed under oath, in the form of an affidavit, by your company's president, chief executive officer, general counsel, or a corporate officer of comparable authority and responsibility, after the company, under the

supervision and control of that individual, has diligently conducted a thorough investigation into the trading activities of the company's employees and agents, including those of its affiliates¹ and subsidiaries, in the U.S. portion of the WSCC during the years 2000 and 2001.² **Your response is due on or before May 31, 2002.**

Your company's failure to respond in a timely and complete fashion may result in enforcement action, including the issuance of an order directing a public utility to show cause why the Commission should not revoke the public utility's authority to sell wholesale electricity and/or ancillary services at market-based rates.

I. Request for Admission

A. Admit or Deny: The company engaged in activities referred to as "wash," "round trip" or "sell/buyback" trading. This trading involves the sale of an electricity product to another company together with a simultaneous purchase of the same product at the same price.

B. If you so admit, provide transaction by transaction details for all such transactions your company engaged in, including, but not limited to, the following:

1. Indicate the methods and rationale used to arrive at the value or compensation of such transactions.

2. Indicate whether any such transactions were reported to Platt's, Bloomberg, or any organization that monitors, publishes or reports trading data (including bid-and-ask data) or publishes or reports prices or forward indices.

¹An "affiliate" is defined as stated in 18 C.F.R. § 161.2 (2001); *see* The Power Company of America, L.P., 79 FERC ¶ 61,067 at 61,325-12 (1997) (applying definition of "affiliate" in the Commission's Standards of Conduct for Interstate Pipelines with Marketing Affiliates to non-EWG public utilities).

²At a minimum, the signatory to the affidavit must state that he or she certifies that the information and documents provided constitute a response that is true and accurate to the best of that individual's knowledge, information, and belief formed, after a thorough investigation was diligently conducted, under the supervision and control of that individual, into the trading activities of the company's employees and agents, including those of its affiliates and subsidiaries, in the U.S. portion of the WSCC during the years 2000 and 2001.

3. Identify all such transactions referred to in question 3 that were so published or reported, or were disseminated in any manner.

4. Identify all traders that participated in such transactions, by name and position within your company, if employed by you, or by name and affiliation if they were not or are not presently employed by your company.

5. Identify how such transactions were executed (e.g., whether an electronic platform was used to initiate the sale, with the buy transaction subsequently arranged through a broker or by telephone).

6. Describe all policies and procedures implemented to prevent future transactions of this type.

II. Request for Production of Documents

To the extent your company engaged in "wash," "round trip," or "sell/buyback" type transactions, provide the following documents:

- C. Provide copies of all communications or correspondence, including e-mail messages, instant messages, or telephone logs, between your company and any other company (including your affiliates or subsidiaries) that refer or relate to this activity.
- D. Provide copies of all material, including, but not limited to, opinion letters, memoranda, communications (including e-mails and telephone logs), or reports, that address or discuss your company's knowledge of, awareness of, understanding of, or employment or use of any of any such transactions in the U.S. portion of the WSCC during the period 2000-2001.

To the extent that you wish to make a claim of privilege with respect to any responsive material, please provide an index of each of those materials, which includes the date of the each individual document, its title, its recipient(s) and its sender(s), a summary of the contents of the document, and the basis of the claim of privilege.

III. Manner of Providing Information

All written responses should consist of a single copy of the submission and should specify that they are to the attention of Mr. Donald J. Gelinas, Associate Director, Office of Markets, Tariffs and Rates. Responses delivered by hand to the Commission should be delivered to Dockets, Room 1A.

Additionally, you must provide information concerning any such transactions on an Excel spreadsheet. The spreadsheet needed to complete the information requested is contained in a file posted on the Commission's web page for Docket No. PA02-2-000 (<http://www.ferc.gov/electric/bulkpower/pa02-2/pa02-2.htm>). On the spreadsheet, the company must identify the entered-into dates and times of such transactions, counter-parties to the transactions, transaction start and stop date/times, types of service, locations, quantities traded, prices, the identities of any index price at which trades were made and the identities of any online trading platforms used. The spreadsheet is to be completed by respondents and e-mailed to PA02-2@ferc.gov. A response that exceeds the row limit for an Excel spreadsheet must be reported in CSV format. If any respondent seeks privileged treatment of the information pursuant to 18 C.F.R. § 388.112 (2001), two versions of the spreadsheet should be e-mailed. Include in the e-mail and in the title of the spreadsheet that the information is "Confidential" or "Not Confidential."

Attachment A

Sellers of Wholesale Electricity and/or Ancillary Services In the U.S. Portion of the WSCC During 2000-2001

-5-

Edward J. Brady
Chief Counsel - Regulatory Services
Legal Department, 29th Floor
American Electric Power Service Corporation

1 Riverside Plaza
Columbus, OH 43215-2373

Catherine Barron

-6-

-7-

-8-

Director of Wholesale Marketing
AES New Energy, Inc.
535 Boylston Street, Top Floor
Boston, MA 02116

Jennifer Lehmann
President
AES Placerita, Inc.
20885 Placerita Canyon Road

Newhall, CA 91321

-9-

-10-

-11-

Max Laun
Counsel
Alcoa Power Generating Inc.
201 Isabella Street

Pittsburgh, PA 15212-5858

Patricia J. Clark
Deputy General Counsel

Allegheny Energy Supply Company, LLC
4350 Northern Pike
Monroeville, PA 15146

-12-

-13-

-14-

Bonnie S. Blair
Counsel to the City of Anaheim
Thompson Coburn LLP
1909 K Street, NW, Suite 600

Washington, DC 20006

John W. McKinney
Vice President - Regulatory Affairs
UtiliCorp United Inc.
10700 E 350 Highway

-15-

-16-

-17-

Kansas City, MO 64138

Patricia E. Cooper
Corporate Counsel
Arizona Electric Power Cooperative, Inc.
1000 S. Highway 80
Post Office Box 670

Benson, AZ 85602
Alan Propper
Director, Pricing & Regulation
Arizona Public Service Company

-18-

-19-

-20-

Post Office Box 53999, Station 9909
Phoenix, AZ 85072-3999
James M. Henderson
General Manager

Arkansas River Power Authority
P.O. Box 70
3409 South Main
Lamar, Colorado 81052

Terry L. Syms
Vice President & Corporate Secretary
Avista Corp. & Avista Energy, Inc.
1411 East Mission Avenue

-21-

-22-

-23-

Spokane, WA 99202

Joe Hsu
Chief Operating Officer Director of Utilities
Azusa Light & Water
Post Office Box 9500

Azusa, CA 91702-9500

-24-

-25-

-26-

-27-

-28-

<p>Claire M. Olson Vice President and General Counsel Basin Electric Power Cooperative 1717 East Interstate Avenue</p>	<p>Bismarck, ND 58503-0564</p> <p>Brian Ferguson</p>	<p>Black Hills Colorado, LLC 1075 Noel Avenue Wheeling IL 60090 Steven J. Helmers</p>
-29-	-30-	-31-
<p>General Counsel & Corporate Secretary Black Hills Generation, Inc. 625 Ninth Street Post Office Box 1400 Rapid City, SD 57709-1400</p>	<p>Marybeth Van Buren Assistant General Counsel for Power Bonneville Power Administration Post Office Box 3261 - LP</p>	<p>Portland, OR 97208-3621</p>
-32-	-33-	-34-
<p>William T. Benham Vice President BP Energy Company Mail Code 4.334 501 WestLake Park Boulevard</p>	<p>Houston, TX 77079 Jon R. Stickman Counsel to the City of Burbank Duncan & Allen</p>	<p>1575 I Street, N.W., Suite 300 Washington, DC 20005-1175 Elisa J. Grammar Counsel to the California</p>
-35-	-36-	-37-
<p>Department of Water Resources Law Offices of GKRSE 1500 K St, NW, Suite 330 Washington, DC 20005</p>	<p>Jared W. Johnson Counsel to CalPeak Project Companies LATHAM & WATKINS 555 Eleventh Street, N.W. Suite 1000</p>	<p>Washington, D.C. 20004</p>
-38-	-39-	-40-
<p>Alex Makler Senior Regulatory Council Calpine Energy Services, L.P 1350 I Street NW</p>	<p>Washington, DC 20005</p>	<p>Richard B. Davenport Cargill-Alliant, LLC 12700 Whitewater Drive</p>
-41-	-42-	-43-
<p>Minnetonka MN 55343</p>	<p>Jeffrey A. Gollomp Cinergy Capital & Trading, Inc. 139 East Fourth Street, PO Box 960</p>	<p>Cincinnati OH 45201</p>
-44-	-45-	-46-
<p>Mark Gendron, Manager Idaho Falls Power</p>	<p>140 S. Capital Ave., P.O. Box 50220 Idaho Falls, Idaho 83405</p>	<p>Tamara Townsend Attorney for City of Klamath Falls Cable Huston Benedict Haagensen & Lloyd Suite 2000 1001 SW Fifth Avenue</p>
-47-	-48-	-49-
<p>Portland, Oregon 97204-1136 Dennis W. Alexander Group Senior Vice President & General Counsel</p>	<p>Cogentrix Energy, Inc. 945 Arrowpoint Boulevard Charlotte, NC 28273-8110</p>	<p>Gail A. Bates Deputy Executive Director The Colorado River Commission of Nevada</p>
-50-	-51-	-52-

555 East Washington Avenue, Suite 3100, Las Vegas, Nevada 89101
Gregory Johnson
General Counsel

-53-

Colorado Springs Utilities
111 S. Cascade Avenue
Colorado Springs, CO 80903

-54-

Bonnie S. Blair
Counsel to the City of Colton
Thompson Coburn LLP

-55-

1909 K Street, NW, Suite 600
Washington, DC 20006
Phillip G. Lookadoo, Esq.
Counsel for Colton Power , LP

-56-

Thehan Reid & Priest
701 Pennsylvania Avenue, NW
Market Square, Suite 800
Washington, DC 20004-2608

-57-

Dennis Stieren
Vice President of Risk Control
ConAgra Energy Services, Inc.

-58-

11 ConAgra Drive, Suite 5031
Omaha, NE 68102-5031

-59-

Paul T. Sapibari
Conectiv Energy Supply, Inc.
Post Office Box 6066

-60-

Newark DE 19714

-61-

Joanna Baker
Conoco Power Marketing Inc

-62-

Post Office Box 2197
Houston TX 77252

-63-

David M. Perlman
General Counsel
Constellation Power Source, Inc.

-64-

111 Market Place, Suite 500
Baltimore, MD 21202
Robert R. Reilley
Vice President, Regulatory Affairs

-65-

Coral Energy Management, L.L.C. & Coral Power L.L.C.
909 Fannin, Suite 700
Houston, TX 77010

-66-

David F. Crabtree
Vice President & General Counsel
Deseret Generation & Transmission Co-operative

-67-

10714 South Jordan Gateway, Suite 300
South Jordan, UT 84095

-68-

Jeffrey M. Trepel
Associate General Counsel
Duke Energy Corporation

-69-

422 South Church Street
Charlotte, NC 28202-1904

-70-

Patti Fitzpatrick
Duke Energy Trading and Marketing
10777 Westheimer, Suite 650

-71-

Houston TX 77042

-72-

Dan King
Director & Regulatory Counsel
Dynergy Power Marketing, Inc.

-73-

805 15th Street, N.W., Suite 510A
Washington, DC 20005
James P. Mathis

-74-

Vice President, Regulatory
Edison Mission Energy
555 12th Street, NW

-75-

Washington, DC 20004

-76-

Lindsay Anderson
Edison Source
15191 Crossroads Parkway N.

City of Industry CA 91746

Terry Bassham
Vice President and General Counsel
El Paso Electric Power Company

-77-

-78-

-79-

123 W. Mills Street, Location 167
El Paso, TX 79901

Dennis M. Price
El Paso Merchant Energy

Post Office Box 2511
Houston TX 77252

-80-

-81-

-82-

Britt E. Ide
Legal Department
Emmett Power Company
c/o Boise Cascade Corporation

1111 West Jefferson Street P.O. Box 50
Boise, ID 83728-0001

Darin Lowther
Manager, Regulatory Affairs
ENMAX Energy Marketing Inc

-83-

-84-

-85-

2808 Spiller Road SE
Calgary, AB T2G 4H3

Marty Jo Rogers
Assistant General Counsel
Energy-Koch Trading, LP
7th Floor

20 Greenway Plaza
Houston, Texas 77046

-86-

-87-

-88-

Eric M Hiaasen
Eugene Water & Electric Board
PO Box 10148

Eugene, OR 97440-2148

David J. Dulick
General Counsel
Exelon Energy Company

-89-

-90-

-91-

2600 Monroe Boulevard
Norristown, PA 19403

Alan Glazner
Farmington Electric Utility System 800
Municipal Drive FARMINGTON, NM

87401
Maurice T. Klefeker
Fountain Valley Power, L.L.C.

-92-

-93-

-94-

co Black Hills Energy
1075 Noel Road
Wheeling IL 60090

Roberto R. Denis
Vice President
FPL Energy L.L.C.

9250 W. Flagler Street
Miami, FL 33174
Kenneth Salvagno

-95-

-96-

-97-

Vice President
Fresno Cogeneration Partners, L.P.
650 Bercut Drive, Suite C

Sacramento, CA 95814

Steven G. Lins
Assistant City Attorney
613 E. Broadway, Suite 220

-98-

-99-

-100-

Glendale, CA 91206

Russ Barney
Graham County Electric Coop. Inc.

PO Draw B
Pima, AZ 85543

-101-

-102-

-103-

Duane Nelson
GWF Energy LLC

4300 Railroad Avenue
Pittsburgh CA 94565

Todd Brinkmeyer
Haleywest L.L.C.

-104-

-105-

-106-

Post Office Box 171
Laclede ID 83851

James P. Mathis
Vice President, Regulatory
Harbor Cogeneration Company
c/o Edison Mission Energy

555 12th Street, NW
Washington, DC 20004

-107-

-108-

-109-

James D. Stromberg
Hinson Power Company
40 Lake Bellevue, Suite 100

Bellevue WA

Ralph Sanders
Plant Manager
HL Power Company

-110-

-111-

-112-

732-025 Wendel Road
Wendel, Ca. 96136

**James Thompson
Vice President, Secretary and
General Counsel
IDACORP Energy L.P.
350 North Mitchell Street
Boise, Idaho 83704**

Robert W. Stahman
Vice President, General Counsel & Secretary
Idaho Power Company
1221 West Idaho Street

-113-

-114-

-115-

Post Office Box 70
Boise, ID 83707

Jon R. Stickman
Attorney for Imperial Irrigation District
Duncan & Allen
1575 Eye Street, N.W.

Washington, D.C. 20005

-116-

-117-

-118-

Kris Mikkelsen
General Manager
Inland Power & Light Company

320 E. Second Avenue
Spokane, WA 99220

William P. Scharfenberg
Attorney for Intercom Energy, Inc.
Paul Hastings
1299 Pennsylvania Avenue, N.W., Tenth Floor

-119-

-120-

-121-

Washington, D.C. 20004-2400

Koji Matsumura
Vice President
KPIC North America Corporation

375 PARK AVENUE, SUITE 2607
NEW YORK, NY 10152

-122-

-123-

-124-

Frank Cady
Controller
Lassen Municipal Utility District

60 S. Lassen Street
Susanville, CA 96130

Marcia Haber Kamine
Assistant City Attorney
City of Los Angeles

-125-

-126-

-127-

P.O. Box 51111
Los Angeles, California 90051-0100

McMinnville Water and Light
Cable Huston Benedict Haagensen & Lloyd
1001 SW 5th Avenue Suite 2000
Portland, OR 97204

Steve Eckert
Managing Director & CEO
Merchant Energy Group of the Americas, Inc.
151 West Street, Suite 300

Tamara Townsend

-128-

-129-

-130-

Annapolis, MD 21401

Locke R. McMurray
Senior Vice President and Senior Counsel
Merrill Lynch & Co., Inc.

250 Vesey Street, 12th Floor
New York, NY 10281-1312

-131-

-132-

-133-

Ernest M. Hahn
Senior Resource Specialist
Metropolitan Water District of Southern
California

P.O. Box 54153
Los Angeles, CA 90054-0153

Brian E. McGee
MIECO Inc.

-134-

-135-

-136-

301 East Ocean Blvd., Suite 1100
Long Beach CA 90802

Debra Raggio Bolton
Senior Counsel
Mirant Americans, Inc.

901 F Street, NW, Suite 800
Washington, DC 20004

-137-

-138-

-139-

Wallace L. Duncan
Counsel to the Modesto Irrigation District
Duncan, Weinberg, Genzer & Pembroke
1615 M Street, N.W. - Suite 800

Washington, D.C. 20036

Jack Haffey
Executive Vice President & COO
Energy Services Division
Montana Power Company

-140-

-141-

-142-

40 East Broadway
Butte, MT 59701
Deborah Hart
Vice President

Morgan Stanley Capital Group Inc.
4th Floor - Commodities Department
1585 Broadway
New York, NY 10036

Robert Loeffler
Morrison & Foerster
Mountainview Power Company

-143-

-144-

-145-

2000 Pennsylvania Avenue, N.W.
Washington DC 20006

Christine Stanley
Energy Scheduler
Municipal Energy Agency of Nebraska
PO Box 19124

Lincoln, NE 68509-5124

-146-

-147-

-148-

William F. McCoy Naniwa Energy LLC	1221 Avenue of the Americas New York NY 10020	Connie L. Westadt Associate General Counsel Sierra Pacific Resources 6100 Neil Road
-149-	-150-	-151-
Reno, NV 89520	Meg Meiser Counsel to the Northern California Power Agency Spiegel & McDiarmid	1350 New York Avenue, NW Washington, DC 20005
-152-	-153-	-154-
Alan D. Dietrich Vice President - Legal Administration & Corporate Secretary NorthWestern Corporation	125 S. Dakota Ave. Sioux Falls, SD 57104	James J. Bender General Counsel NRG Energy, Inc. 901 Marquette Avenue, Suite 2300
-155-	-156-	-157-
Minneapolis, MN 55402-3265	William L. Wylie Vice President, Transmission and Electricity Operations OGC Energy Resources, Inc.	Post Office Box 24300 Oklahoma City, OK 73124-0300
-158-	-159-	-160-
Bruce Gerhardson Associate General Counsel Otter Tail Corporation	215 South Cascade Street Fergus Falls, MN 56538-0496	Joseph H. Fagan Counsel for Pacific Gas and Electric Company HellerEhrman 1666 K Street, N.W. Suite 300
-161-	-162-	-163-
Washington, D.C. 20006-1228	Jack E. Stamper Regulatory Manager PacifiCorp	700 N.E. Multnomah, Room 550 Portland, OR 97232
-164-	-165-	-166-
Jan Wolsleben PacifiCorp Power Marketing, Inc	830 NE Holladay, Suite 250 Portland OR 97232	Steven K. Endo, P.E. Principal Engineer Pasadena Water and Power Wholesale Energy Products
-167-	-168-	-169-
150 S. Los Robles, Suite 200 Pasadena, CA 91101 Sanford L. Hartman Vice President and Associate General Counsel	PG&E National Energy Group 7500 Old Georgetown Road, 13th Floor Bethesda, MD 20814	William P. Scharfenberg Paul Hastings Attorneys for Phelps Dodge Energy Services 1299 Pennsylvania Avenue, N.W., Tenth Floor
-170-	-171-	-172-

Washington, D.C. 20004-2400	Thomas R. Darton Pilot Power Group, Inc 4870 Riding Ridge Road	San Diego CA 92130
-173-	-174-	-175-
Carol Harris Platte River Power Authority 2000 East Horsetooth Road	Fort Collins, Colorado 80525-5721	King M. Lum Director, Contracts Powerex Corp. 666 Burrard Street, Suite 1400
-176-	-177-	-178-
Vancouver, BC V6C 2X8 Canada	PPL Services Corporation Two North Ninth Street Allentown, PA 18101	David B. Kinnard, Esquire PPL Montana, LLC
Jesse A. Dillon, Esquire		
-179-	-180-	-181-
303 North Broadway, Suite 400 Billings, MT 59101	Gary R. Johnson General Counsel Xcel Energy	800 Nicollet Mall, Suite 2900 Minneapolis, MN 55402
-182-	-183-	-184-
Roger D. Eklund Regulatory Project Manager Public Service Company of New Mexico	Alvarado Square, MS 0920 Albuquerque, NM 87158	Bonnie S. Blair Counsel to the Pacific Northwest PUDs Thompson Coburn LLP 1909 K Street, NW
-185-	-186-	-187-
Suite 600 Washington, DC 20006 William G. Dearing, P.E. Managing Director - Power Management &	Administrative Services 327 North Wenatchee Avenue Post Office Box 1231 Wenatchee, WA 98807-1231	Gary Huhta Public Utility District No. 1 of Cowlitz County, Washington
-188-	-189-	-190-
961 12th Avenue Longview, WA 98632 William C. Dobbins CEO/Manager	PUD No 1 of Douglas County 1151 Valley Mall Parkway East Wenatchee Washington 98802-4497	Jim Scheel Director, Hydro Operations and Power Supply Pend Oreille PUD PO Box 190130 N Washington Newport,
-191-	-192-	-193-
Washington 99156 Eric Christensen Associate General Counsel Snohomish County PUD	2320 California Street PO Box 1107 Everett, WA 98206-1107	Bonnie S. Blair Mark L. Parsons Counsel to Grant PUD Thompson Coburn LLP
-194-	-195-	-196-

1909 K Street, NW Suite 600
Washington, DC 20006

Kimberly J. Harris
Assistant General Counsel
Puget Sound Energy, Inc.

411 - 108th Street, NE, OBC-15
Bellevue, WA 98004-5515

-197-

-198-

-199-

James D. Pembroke
Attorney for the City of Redding, California
Duncan, Weinberg, Genzer & Pembroke, P.C

1615 M Street, N.W. - Suite 800
Washington, DC 20036

Michael G. Briggs
Senior Counsel
Reliant Energy, Incorporated

-200-

-201-

-202-

801 Pennsylvania Avenue, NW, Suite 620
Washington, DC 20004-2604

Bonnie S. Blair
Mark L. Parsons
Counsel to the City of Riverside
Thompson Coburn LLP

1909 K Street, NW Suite 600
Washington, DC 20006
Adrienne Clair
Counsel to the Sacramento Municipal Utility

-203-

-204-

-205-

District
Morrison & Hecker, LLP
1150 18th Street, NW Suite 800
Washington, DC 20036

Deborah A. Swanstrom
Counsel to the Salt River Project
Sullivan & Worchester LLP

1666 K Street, NW
Washington, DC 20006

-206-

-207-

-208-

David B. Follett
Assistant General Counsel
Sempra Energy

101 Ash Street, HQ13D
San Diego, CA 92101

Theresa Mueller
Deputy City Attorney

-209-

-210-

-211-

City Hall, Room 234
San Francisco, CA 94102

James D. Pembroke
Attorney for the City of Santa Clara
Duncan, Weinberg, Genzer & Pembroke, P.C

1615 M Street, N.W. - Suite 800
Washington, DC 20036

-212-

-213-

-214-

William H. Patton
Director, Utilities Section
Seattle City Attorney's Office
Municipal Building – 10th Floor.

600 Fourth Avenue
Seattle, WA 98104

Cathy Syme
Assistant Vice President - Project
Administration
Sea West WindPower, Inc.

-215-

-216-

-217-

1455 Frazee Road, Suite 900
San Diego, CA 92108

James F. Walsh
Sempra Energy Resources
101 Ash Street

San Diego CA 92101

-218-

-219-

-220-

Mara E. Kent Vice President Sempra Energy Trading Corp.	58 Commerce Road Stamford, CT 06902	Ed Eyring SF Phosphates Ltd. Co.
-221-	-222-	-223-
P.O. Box 1789, 515 So. Hwy 430 Rock Springs, Wy 82902	Connie L. Westadt Associate General Counsel Sierra Pacific Power Company	Post Office Box 10100 Reno, NV 89520-0024
-224-	-225-	-226-
Stephen E. Pickett Vice President and General Counsel Southern California Edison Company 244 Walnut Grove Avenue	Post Office Box 800 Rosemead, CA 91770	Randolph Lee Elliott Attorney for the Southern California Water Company Miller, Balis & O'Neil, P.C.
-227-	-228-	-229-
1140 Nineteenth Street, NW Suite 700 Washington, DC 20036-6600	Bob Schmitt Director of Resource Management Springfield Utility Board	250 "A" Street Springfield, OR 97477
-230-	-231-	-232-
Wanda M. Schiller General Counsel Strategic Energy L.L.C.	Two Gateway Center Pittsburgh, PA 15222	Susan E. Spar General Counsel Sunlaw Energy Partners I, L.P.
-233-	-234-	-235-
2045 East Vernon Avenue Los Angeles, CA 90058	Steven D. Eisenberg Sunrise Power Company, LLC Suite 1700	8101 Von Karman Avenue Irvine CA 92612
-236-	-237-	-238-
Dolores Stegeman Assistant Power Manager Resource Operations and Trading Tacoma Power	3628 South 35th Street Tacoma, Washington 98409-3192	Norma Rosner Iacovo Assistant General Counsel Tenaska Power Services Co.
-239-	-240-	-241-
1701 E. Lamar Boulevard, Suite 100 Arlington, TX 76006	John P. Beall Texaco Natural Gas Inc.	1111 Bagby Street Houston TX 77002
-242-	-243-	-244-

Michael D. Blanchard Vice President & General Counsel Texas-New Mexico Power Company	4100 International Plaza Fort Worth, TX 76109	Susan T. Covino The New Power Company
-245-	-246-	-247-
10 Glenville Street Greenwich CT 06831	Andrew N. Chau Regulatory Counsel Tractebel Energy Marketing, Inc.	1177 West Loop South, Suite 900 Houston, TX 77027
-248-	-249-	-250-
Corporate Secretary TransAlta Corporation 110 12th Avenue S.W. Box 1900, Station M Calgary, Alberta T2P 2M1	Canada Kristine Delkus Vice President, Law TransCanada Pipelines Limited	450 1st Street, S.W. Post Office Box 1000, Station M (T2P 4K5) Calgary, Alberta T2P 5H1 Canada
-251-	-252-	-253-
Jeff Richie Manager Trigen-Colorado Energy Corporation	25 10th Street Post Office Box 4088 Golden, CO 80401-0088	Robert Wolaver Power Marketing and Resources Manager Tri-State Generation and Transmission Association, Inc.
-254-	-255-	-256-
1100 W. 116th Avenue PO Box 33695 Denver, CO 80233 Erik Bakken Corporate Counsel	Tucson Electric Power Company 1 South Church Street (85701) Post Office Box 711 Tucson, AZ 85702	Jon R. Stickman Attorney for the Turlock Irrigation District Duncan & Allen
-257-	-258-	-259-
1575 Eye Street, N.W. Washington, D.C. 20005	Diane Kubin Secretary and Assistant Treasurer TXU Electric Company	1601 Bryan Street, Suite 34100 Dallas, TX 75201-3411
-260-	-261-	-262-
Melissa A. Browning-Sletten Engineering Coordinator United Power, Inc.	18551 E. 160th Avenue Brighton, CO 80601	Marshall Empey Planning Manager Utah Associated Municipal Power Systems
-263-	-264-	-265-
2825 E. Cottonwood Parkway, Suite 200 Salt Lake City, Utah 84121	G. Richard Judd Chief Operating Officer Utah Municipal Power Agency	75 West 300 North PO Box 818 Spanish Fork, UT 84660
-266-	-267-	-268-

<p>John W. McKinney Vice President - Regulatory Affairs UtiliCorp United Inc.</p>	<p>10700 E 350 Highway Kansas City, MO 64138</p>	<p>Channing D. Strother, Jr., Esq. Attorney for City of Vernon McCarthy, Sweeney & Harkaway, PC</p>
<p>-269-</p>	<p>-270-</p>	<p>-271-</p>
<p>2175 K Street, NW Ste. 600 Washington, DC 20037</p>	<p>Amy B. Comer Wellhead Power Gates, LLC & Wellhead Power Panoche, LLC Thelen, Reid & Priest LLP</p>	<p>701 Pennsylvania Ave, NW Suite 800 Washington, D.C. 20004</p>
<p>-272-</p>	<p>-273-</p>	<p>-274-</p>
<p>M. Susan Earley Attorney Team Lead Western Area Power Administration PO Box 281213</p>	<p>Lakewood, Co 80228-8213</p>	<p>Jared W. Johnson Wildflower Energy LP, Indigo Generation LLC and Larkspur Energy LLC LATHAM & WATKINS</p>
<p>-275-</p>	<p>-276-</p>	<p>-277-</p>
<p>555 Eleventh Street, N.W. Suite 1000 Washington, D.C. 20004</p>	<p>Alex A. Goldberg Senior Regulatory Counsel Williams</p>	<p>One Williams Center, Suite 4100 Tulsa, OK 74172</p>
<p>-278-</p>	<p>-279-</p>	<p>-280-</p>
<p>Larry E. LaMaack Executive Director Wyoming Municipal Power Agency P.O. Box 900</p>	<p>West Hwy 20 Lusk, Wyoming 82225-0900 Craig W. Silverstein, Esq. Attorney for Yampa Valley Electric Association</p>	<p>Miller, Balis & O'Neil, P.C. 1140 Nineteenth Street NW, Suite 700 Washington, DC 20036</p>
<p>-281-</p>	<p>-282-</p>	<p>-283-</p>