



October 11, 2001

**VIA ELECTRONIC MAIL ONLY**

Theodore Paradise  
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The Washington Harbour  
3000 K Street, NW, Suite 300  
Washington, DC 20007-5116

Dear Ted,

This letter is in further response to your telephone call and email yesterday regarding CAC/EPUC's response to the CAISO's Second Data Request in the Grid Management Charge proceeding. With regards to request ISO-CAC/EPUC-18, consistent with the manner in which the request was clarified in our telephone call yesterday, we will provide an amended response to this data request within ten business days.

With regards to ISO-CAC/EPUC-14(b), as I informed you on the phone, Mr. Ross did not rely on or review any individual data in the course of his employment as an expert witness in the GMC proceeding. Moreover, no individual data was ever provided to him by this law firm, CAC/EPUC, or any individual member of CAC/EPUC as part of his employment as an expert witness in the GMC proceeding.

Mr. Ross has hundreds of files in his possession, accumulated in over twenty years of consulting practice, that relate to matters other than the instant GMC proceeding. Mr. Ross does not have the authorization or discretion to utilize proprietary and confidential materials provided to him for a limited purpose by one client in any subsequent performance of consulting work on behalf of another client. In any event, a review of hundreds of files would be unduly burdensome given that the individual information sought is not relevant. As we have previously stated, the individual data sought by the ISO is outside the scope of the proceeding, is not relevant to the subject matter of the pending proceeding, and is not likely to lead to the discovery of admissible evidence. Moreover, the individual information sought is commercially sensitive, requires an unduly burdensome compilation, and appears to be propounded for the sole purpose of harassment. Tellingly, the ISO has provided no justification for why it seeks this individual data.

Please call if you have additional questions or concerns.

Sincerely,

/ S /

Linda Y. Sherif