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August 29, 2001

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BY E-MAIL

The Honorable Bruce L. Birchman
Administrative Law Judge
Federal Energy Regulatory Commission
888 First Street, N.E.
Washington, D.C. 20426

Regarding: San Diego Gas & Electric Company
Docket Nos. EL00-95-045, et al.
Report on Groupings

FILED
OFFICE OF THE SECRETARY
01 AUG 29 PM 12:40
FEDERAL ENERGY
REGULATORY COMMISSION

Dear Judge Birchman:

CalPX regrets to inform you that there has been a serious slippage in the joint data production effort by the CAISO and CalPX. Beginning August 18th, CalPX was supposed to have received on a daily basis (including Saturdays and Sundays) ten to fifteen days worth of data, and by now CalPX should have received approximately 135 days worth of data. In fact, by close of business Monday, August 27th CalPX had received only 31 days worth of data. In addition, the data for fifteen of those days contain errors which will have to be corrected by CAISO's rerunning the data for the affected days or by CAISO's providing CalPX spread sheets identifying the erroneous items and enabling CalPX to make manual corrections to the data. The latter procedure is quite time-consuming.

CalPX was informed yesterday that CAISO would be able to "catch up" and provide CalPX the required data for all the remaining days by the end of this week, which is Labor Day weekend. However, as is virtually inevitable, the data for certain of those days are likely to include errors that will have to be corrected using the procedures described above. Even if the new data are error free and the remaining data (including the corrections to the already furnished data) are received by the end of this week, CalPX's ability to process the data and develop its own data in compliance with the procedural schedule you have adopted is in serious doubt.

CalPX has no disagreement with the CAISO and no doubt that the CAISO is furnishing its data as quickly as it is able. Nevertheless, the data production

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requirements may be more formidable than forecasted at the prehearing conference and the procedural schedule predicated on that forecast unrealistically ambitious.

We believe your attention to this matter is warranted and we propose the following procedures. I, perhaps joined by Lynn Miller, plan to telephone you promptly after your receipt of this letter. The call will be purely procedural in character to answer any questions you may have. We then propose to make a written report to you by close of business on Tuesday, September 4th informing you of the data received by CalPX from the CAISO and containing CalPX's estimate of the date by which its own data production effort can be completed.

I have filed the original of this letter with the Commission's Secretary and served copies of it on the all parties to the proceeding via e-mail.

Very truly yours,

Carmen L. Gentile

Carmen L. Gentile
Counsel for California Power
Exchange Corporation

CLG:cdr

Cc: The Honorable David P. Boergers (original and fourteen copies)
Service List (via e-mail)

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