

**PUBLIC**

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December 16, 2002

Joel M. Cockrell, Esq.  
Federal Energy Regulatory Commission  
888 First Street, NE  
Washington, DC 20426

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OF THE SECRETARY  
02 DEC 16 PM 4:37  
FEDERAL ENERGY  
REGULATORY COMMISSION

Re: *El Paso Electric Company, et al.*  
Docket No. EL02-113-000

Dear Mr. Cockrell:

Enclosed with this letter please find the Response of the California Independent System Operator Corporation to Staff-ISO-1-5 in the above-captioned matter. The ISO is providing the described files supporting these responses by electronic means only (via CD), due to their large size. As well, the files consist of **Protected Materials** that are being provided subject to the **Protective Order** to those individuals that have completed the Non-Disclosure Certificate in this matter. If you have any questions or concerns, please do not hesitate to contact me at (202) 295-8357.

Sincerely,



Julia Moore  
Counsel for the California Independent System  
Operator Corporation

Enclosure

cc: Service List

\* CD-ROM (FERRIS = CONTAINS Protected MATERIAL) AW

**UNITED STATES OF AMERICA  
BEFORE THE  
FEDERAL ENERGY REGULATORY COMMISSION**

**El Paso Electric Company                    )     Docket No. EL02-113-000**  
**Enron Power Marketing, Inc.                )**

**Response of the California Independent System  
Operator Corporation to the Commission Trial Staff's  
First Set of Discovery - Questions 1-5**

**Staff-ISO-1:** Please provide any information, studies, or analyses that the CAISO has performed or is in possession of concerning congestion payments to Enron Power Marketing, Inc. during the years 2000 and 2001.

**Response:**

Results of analysis that was done regarding strategies outlined in the three Enron memos posted on the Commission's website on May 6, 2002 involving congestion payments to Enron Power Marketing during the years 2000 and 2001 are provided in the documents and workfiles described below:

EnronReport\_el92113.doc  
CutSchedules\_el92113.xls  
Zeroratedpaths\_el92113.xls  
DeathStar\_el92113.xls  
Path1526\_enron.xls

These documents are **Protected Materials** that are being provided subject to the **Protective Order** to those individuals that have completed the Non-Disclosure Certificate in this matter. They are being provided in electronic format only due to their large size.

**Respondent:** Eric Hildebrandt  
                  Manager, Market Investigations

**Date:**            December 16, 2002

**Staff-ISO-2:** Please provide all settlement documentation for energy trades, energy sales and transmission transactions in the possession of the CAISO for Enron Power Marketing, Inc. and El Paso Electric Company between CAISO and Palo Verde during the years 2000 and 2001.

**Response:** ISO settlement files for these entities during this date range are provided in the following files:

ss\_details\_pv.xls  
ss\_adjustments\_pv.xls

These documents are **Protected Materials** that are being provided subject to the Protective Order to those individuals that have completed the Non-Disclosure Certificate in this matter. They are being provided in electronic format only due to their large size.

Explanatory information related to the data in the above files is provided in the following documents:

Baids.xls  
Iso\_charge\_matrix.xls  
Settlement\_file\_specs.pdf

**Respondent:** Eric Hildebrandt  
Manager, Market Investigations  
**Date:** December 16, 2002

**Staff-ISO-3:** Please provide all settlement documentation for energy trades, energy sales and transmission transactions in the possession of the CAISO for Enron Power Marketing, Inc. and El Paso Electric Company between CAISO and Four Corners during the years 2000 and 2001.

**Response:** ISO settlement files for these entities during this date range are provided in the following files:

ss\_details\_fc.xls  
ss\_adjustments\_fc.xls

These documents are **Protected Materials** that are being provided subject to the Protective Order to those individuals that have completed the Non-Disclosure Certificate in this matter. They are being provided in electronic format only due to their large size.

Explanatory information related to the data in the above files is provided in the following documents:

Baids.xls  
Iso\_charge\_matrix.xls  
Settlement\_file\_specs.pdf

**Respondent:** Eric Hildebrandt  
Manager, Market Investigations

**Date:** December 16, 2002

**Staff-ISO-4:** Please provide all schedules of energy from and to California for transactions involving any of the following entities; Enron Power Marketing Inc. and El Paso Electric Company which involved Palo Verde or Four Corners during the years 2000 and 2001.

**Response:** Day Ahead, Hour ahead and final real time schedules for these entities, along with any dispatches for real time energy and out-of-market purchases through the ISO market are provided in the following files:

Interchge\_fc.xls  
Beep\_fc.xls  
Msu\_oom\_fc.xls  
Interchge\_pv.xls  
Beep\_paloverde.xls  
Msu\_oom\_pv.xls

These documents are **Protected Materials** that are being provided subject to the Protective Order to those individuals that have completed the Non-Disclosure Certificate in this matter. They are being provided in electronic format only due to their large size.

**Respondent:** Eric Hildebrandt  
Manager, Market Investigations  
**Date:** December 16, 2002

**Staff-ISO-5:** Please provide all studies the ISO has performed regarding manipulation or potential manipulation of markets in the southwestern United States and/or involving use of the Palo Verde or Four Corners by Enron Power Marketing, Inc. or El Paso Electric Company.

**Response:** See response to No. 1.

**Respondent:** Eric Hildebrandt  
Manager, Market Investigations

**Date:** December 16, 2002