

not represent an official WECC position and asserted on information and belief that CMOPS had recently voted against the interpretation of load responsibility set forth by WECC staff. In its Brief Opposing Exceptions, the ISO explained that no action had been taken rejecting that the WECC staff interpretation, and it remained operative.

The attached letter confirms the ISO's conclusions about the WECC position. Unfortunately, counsel was unable to obtain a copy of the letter prior to the deadline for the Brief Opposing Exceptions. Nonetheless, because CAC/EPUC attempted to introduce new evidence on this issue, albeit on information and belief, the Commission should permit the ISO to supplement the record with documentary evidence that responds to CAC/EPUC's contention.

CONCLUSION

For the reasons described above, the Commission should grant the ISO's motion and accept into the record the attached letter.

Respectfully Submitted,

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CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon each person designated on the service list compiled by the Secretary in this proceeding.

Dated at Washington, DC, this 3rd day of July, 2002.

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