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December 8, 2003

**VIA COURIER AND EMAIL**

Deborah A. Swanstrom, Esq.  
Patton Boggs LLP  
2550 M Street, N.W.  
Washington, DC 20037

Re: Enron's Responses to the Fourth Set of Data Requests of Snohomish Public Utility District No. 1, Docket No. EL03-180-000

Dear Ms. Swanstrom:

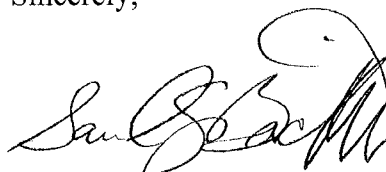
Attached please find Enron's Responses to the Fourth Set of Data Requests of Snohomish Public Utility District No. 1 in the above-referenced proceeding. Copies of these responses are being served in hard copy upon each party who has requested to be served with copies of discovery responses. Please note that certain attachments to this response are being served pursuant to the protective order in this proceeding.

Also enclosed is a mailing envelope, postage prepaid, to be used for the return of the attachment to NC-ENRON-1.1. The redacted version of that attachment is enclosed herewith and is labeled Attachment SNO-ENR-98-1.

Ms. Deborah Swanstrom  
December 8, 2003  
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If you have any questions regarding the attached document do not hesitate to contact us.

Sincerely,

A handwritten signature in black ink, appearing to read "Sam Behrends". The signature is fluid and cursive, with a large, stylized initial "S" and "B".

Sam Behrends  
Samuel G. Backfield

cc: Romakaew P. Broehm (The Brattle Group)  
Kevin McKeon (Counsel for California)  
Eric L. Christensen (Snohomish Public Utility District No. 1)  
Warren Wood (FERC Trial Staff)  
Daniel Simon (FERC Trial Staff)  
John R. Stickman (Counsel for Glendale)  
Lyle Larson (Counsel for Nevada Companies)  
Kevin M. Downey, Esq. (Counsel for PNM)

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

**Enron Power Marketing, Inc.  
and Enron Energy Services Inc.**

**Docket Nos. EL03-180-000, *et al.*  
(Consolidated)**

Enron Power Marketing, Inc. and Enron Energy Services Inc. ("Enron") asserts and incorporates herein by reference its Notice of Objections and Requests for Clarification filed in this proceeding on December 1, 2003 in Response to the Fourth Set of Data Requests of Public Utility District No. 1 of Snohomish County, Washington, even if not specifically stated herein. Without waiving any objections, Enron states herein as follows:

**FOURTH SET OF DATA REQUESTS  
OF PUBLIC UTILITY DISTRICT NO. 1 OF SNOHOMISH COUNTY, WASHINGTON  
TO ENRON POWER MARKETING, INC. AND ENRON ENERGY SERVICES INC.**

**REQUEST:**

**SNO-ENR-96** On November 18, 2003, counsel for Enron sent counsel for Snohomish a letter [regarding, *inter alia*, databases that were the subject of a November 14, 2003 discovery conference call.] A copy of that letter is provided as attachment A hereto. [Specifically, the letter purports to provide a description of all Enron databases which Enron's outside consultants, Charles River Associates Incorporated (who employs, among others, Jan Paul Acton, who provided testimony on behalf of Enron in these proceedings) have access to in connection with the work they have been performing for Enron in FERC Docket No. EL03-137-000, *et al.* (now lead Docket No. EL03-152-000, *et al.*), and Docket No. EL03-180-000, *et al.* Among the databases referenced in Attachment A is one entitled "EnPower." Please provide an exact copy of the "EnPower database, on CD-ROM or DVD, that Charles River Associates Incorporated has access to.] (Footnote omitted).

**RESPONSE:**

**SNO-ENR-96**

An exact copy of the "EnPower" database to which Charles River Associates Incorporated has access is provided on a CD-ROM at Attachment SNO-ENR-96-1.

Prepared by: Counsel  
Date: December 8, 2003

UNITED STATES OF AMERICA  
BEFORE THE  
FEDERAL ENERGY REGULATORY COMMISSION

Enron Power Marketing, Inc.  
and Enron Energy Services Inc.

Docket Nos. EL03-180-000, *et al.*  
(Consolidated)

FOURTH SET OF DATA REQUESTS OF  
PUBLIC UTILITY DISTRICT NO. 1 OF SNOHOMISH COUNTY, WASHINGTON TO  
ENRON POWER MARKETING, INC. AND ENRON ENERGY SERVICES INC.

REQUEST:

SNO-ENR-97 Attachment A makes reference [to a database entitled "CAPS." Please provide an exact copy of the entire "CAPS" database, on CD-ROM or DVD, that Charles River Associates Incorporated has access to.]

RESPONSE:

SNO-ENR-97

An exact copy of the entire "CAPS" database to which Charles River Associates Incorporated has access is provided on a CD-ROM, as part of Attachment SNO-ENR-96-1.

Prepared by: Counsel  
Date: December 8, 2003

UNITED STATES OF AMERICA  
BEFORE THE  
FEDERAL ENERGY REGULATORY COMMISSION

Enron Power Marketing, Inc.  
and Enron Energy Services Inc.

Docket Nos. EL03-180-000, *et al.*  
(Consolidated)

FOURTH SET OF DATA REQUESTS OF  
PUBLIC UTILITY DISTRICT NO. 1 OF SNOHOMISH COUNTY, WASHINGTON TO  
ENRON POWER MARKETING, INC. AND ENRON ENERGY SERVICES INC.

REQUEST:

SNO-ENR-98 Attachment A makes reference [to “files from Paul Choi’s H-Drive” that were provided to Charles River Associates Incorporated on a CD. Please provide an exact copy of this CD that Enron provided to Charles River Associates Incorporated.]

RESPONSE:

SNO-ENR-98

An exact copy of the Paul Choi H-Drive CD that Enron provided to Charles River Associates Incorporated was provided to Snohomish on November 21, 2003 in the responses to the First Set of Data Requests of the Nevada Companies. A redacted copy of Mr. Choi's H-Drive CD, which omits information of a personal nature unrelated to these proceedings, is herewith provided to counsel to Snohomish as Attachment SNO-ENR-98-1.

Prepared by: Counsel  
Date: December 8, 2003

UNITED STATES OF AMERICA  
BEFORE THE  
FEDERAL ENERGY REGULATORY COMMISSION

Enron Power Marketing, Inc.  
and Enron Energy Services Inc.

Docket Nos. EL03-180-000, *et al.*  
(Consolidated)

FOURTH SET OF DATA REQUESTS OF  
PUBLIC UTILITY DISTRICT NO. 1 OF SNOHOMISH COUNTY, WASHINGTON TO  
ENRON POWER MARKETING, INC. AND ENRON ENERGY SERVICES INC.

REQUEST:

SNO-ENR-99 Attachment A makes reference [to Enron emails, in a section entitled "OTHER," that Charles River Associates Incorporated has assembled. Please provide a copy of all Enron emails that Charles River Associates Incorporated has assembled.]

RESPONSE:

SNO-ENR-99

The referenced e-mails were provided to Snohomish on November 7, 2003 in response to CAL-ENR-5.b-2 through CAL-ENR-5.b-11.

Prepared by: Jan P. Acton  
Date: December 8, 2003

UNITED STATES OF AMERICA  
BEFORE THE  
FEDERAL ENERGY REGULATORY COMMISSION

Enron Power Marketing, Inc.  
and Enron Energy Services Inc.

Docket Nos. EL03-180-000, *et al.*  
(Consolidated)

FOURTH SET OF DATA REQUESTS OF  
PUBLIC UTILITY DISTRICT NO. 1 OF SNOHOMISH COUNTY, WASHINGTON TO  
ENRON POWER MARKETING, INC. AND ENRON ENERGY SERVICES INC.

REQUEST:

SNO-ENR-100 The Protective Order states, *inter alia*, that “*it is expected that these participants will make every effort to ensure [these] proceedings are on the record and open to the public without the ongoing resort to extraordinary application of this Common Protective Order.*” Please explain why Enron deemed its entire November 18, 2003 letter (Attachment A) as protected materials subject to the Protective Order.

RESPONSE:

SNO-ENR-100

Snohomish has a copy of the referenced November 18, 2003 letter. The letter discusses in detail Enron's databases and their contents which are subject to the Protective Order in this proceeding. Therefore, the letter is subject to the Protective Order.

Prepared by: Counsel  
Date: December 8, 2003

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

**Enron Power Marketing, Inc.  
and Enron Energy Services Inc.**

**Docket Nos. EL03-180-000, *et al.*  
(Consolidated)**

**FOURTH SET OF DATA REQUESTS OF  
PUBLIC UTILITY DISTRICT NO. 1 OF SNOHOMISH COUNTY, WASHINGTON TO  
ENRON POWER MARKETING, INC. AND ENRON ENERGY SERVICES INC.**

**REQUEST:**

**SNO-ENR-101**      Regarding Enron's profits, please provide all documents relating to:

- (a) Schedule "C" financial reserves that pertain to Enron's West Trading Desk and/or power trading in the Western United States during the period January 1, 2000 to June 20, 2001; and
- (b) Schedule "E" financial reserves, or funds that were moved from Schedule "C" reserves, that pertain to Enron's West Trading Desk and/or power trading in the Western United States during the period January 1, 2000 to June 20, 2001.

**RESPONSE:**

**SNO-ENR-101**

Enron asserts and incorporates by reference its objections to this data request filed on December 1, 2003. Without waiving these objections, Enron states that counsel to Snohomish provided, on December 4, 2003, certain supplemental information in order to clarify this question.

Prepared by: Counsel  
Date: December 8, 2003