

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

**Portland General Electric Company)
Enron Power Marketing, Inc.)**

Docket No. EL02-114-000

**RESPONSES OF
PORTLAND GENERAL ELECTRIC COMPANY
TO COMMISSION STAFF DATA REQUEST NO. 001
Dated September 11, 2002**

In accordance with the procedural schedule established in this proceeding, Portland General Electric Company ("PGE") hereby submits its responses to Data Request No. 001 of the Commission's Staff.

REQUEST:

Materials filed with the Commission in PA02-2-000

- 1. With respect to the Commission's Fact-Finding Investigation of Potential Manipulation of Electric and Natural Gas Prices, in Docket No. PA02-2-000, please provide the following:**
 - a) Copies of all responses sent after February 28, 2002, (including the cover letters).**
 - b) Copies of all Commission questions or requests to which PGE responded and the date the response was sent to FERC.**
 - c) If materials were provided in an electronic format (CD or diskette), please provide that format with this request.**
 - d) Provide a list of materials and cover letters, which were sent to FERC (in the PA02-2 docket) previous to February 28, 2002. (Please do send copies of the data at this time.)**

RESPONSE:

The attached materials were supplied in response to data requests in FERC Docket PA02-2-000. The materials are voluminous in nature and are provided in hard copy format as well as in CD format. The following materials are attached: Attachment 1-A (Index); Attachment 1-B (hard copies of non-confidential responses and materials), and Attachment 1-D (5 -CD's containing electronic copies of referenced materials).

00006698
EL02-114-000

Page two
PGE's Response to
FERC Data Request No. 001
September 26, 2002

Attachment 1-C contains confidential and proprietary information and is subject to the Protective Order in FERC Docket EL02-114-000. The responses are being forwarded under separate cover to those parties who signed the Non-Disclosure Certificate in this docket.

Submitted and Prepared
By: Patrick G. Hager
Date Response Answered: 09/26/02
Bates No. Range: See Attachment A

g:\ratecase\ferc\el02-114\dr-in\dr-001.doc

00006699
EL02-114-000

Attachment 001-A
(Index of Attachments, Bates Nos. 6701-6710)

00006700
EL02-114-000

**Portland General Corporation
Response to FERC Data Request No. 1.
DOCKET NO: EL02-114-000**

**Attachment A
Index of Documents Submitted in PA02-2-000**

Doc Nos	Doc. Date	Bates No or Range	Description of Attachment
09/24/02		6698-6699	PGE Response to FERC First Data Request dated September 11, 2002. Response in WORD document and provided electronically and in hard copy
1-1	09/24/02	6701-6710	Index of Attachments
1-2	03/22/02	Included below	PGE's Response to Subpoena duces tecum 3/15/02 (Word responses) reissued electronically and in hard copy on 4/19/02 – See Item 1-82 and 1-100 below
Attachment 1-3 contains Power and Fuel Supply Reports submitted as attachments to Portland General's Response to the Subpoena Duces Tecum filed electronically on or about April 17 th and April 19 th (hard copies attached as 1-3, 1-83 and 1-100)			
1-3	1/06/00 1/07/00	3479-3499	Power Supply Daily Position Report ; Fuel Daily Position Report; Power Supply Daily Position Report ;Fuel Daily Position Report
1-4	1/10/00	3500-3511	Fuel Daily Position Report
1-4a	1/11/00		Power Supply Daily Position Report ; Fuel Daily Position Report
1-5	1/13/00	3512-3520	Power Supply Daily Position Report ; Fuel Daily Position Report
1-6	1/14/00	3521-3528	Power Supply Daily Position Report ; Fuel Daily Position Report
1-7	1/18/00	3529-3535	Power Supply Daily Position Report ; Fuel Daily Position Report
1-8	1/19/00	3536-3544	Power Supply Daily Position Report ; Fuel Daily Position Report
1-9	1/21/00	3545-3553	Power Supply Daily Position Report ; Fuel Daily Position Report
1-10	1/24/00	3554-3560	Power Supply Daily Position Report ; Fuel Daily Position

			Report
1-11	1/26/00	3561-3569	Power Supply Daily Position Report ; Fuel Daily Position Report
1-12	1/31/00	3570-3578	Power Supply Daily Position Report ; Fuel Daily Position Report
1-13	2/01/00	3579-3584	Power Supply Daily Position Report ; Fuel Daily Position Report
1-14	2/02/00	3585-3593	Power Supply Daily Position Report ; Fuel Daily Position Report
1-15	2/03/00	3594-3602	Power Supply Daily Position Report ; Fuel Daily Position Report
1-16	2/04/00	3603-3611	Power Supply Daily Position Report ; Fuel Daily Position Report
1-17	2/07/00	3612-3620	Power Supply Daily Position Report ; Fuel Daily Position Report
1-18	2/11/00	36221-3629	Power Supply Daily Position Report ; Fuel Daily Position Report
1-19	2/14/00	3630-3638	Fuel Daily Position Report ; Power Supply Daily Position Report
1-20	2/15/00	3639-3647	Power Supply Daily Position Report
1-21	2/15/00	3648-3656	Fuel Daily Position Report ; Power Supply Daily Position Report
1-22	2/17/00	3657-3665	Power Supply Daily Position Report ; Fuel Daily Position Report
1-23	2/21/00	3666-3674	Power Supply Daily Position Report ; Fuel Daily Position Report
1-24	2/22/00	3675-3682	Daily Position Report ; Fuel Daily Position Report
1-25	2/24/00	3683-3691	Power Supply Daily Position Report ; Fuel Daily Position Report
1-26	2/25/00	3692-3700	Power Supply Daily Position Report ; Fuel Daily Position Report
1-27	2/28/00	3701-3710	Power Supply Daily Position Report ; Fuel Daily Position Report
1-28	2/29/00	3711-3719	Power Supply Daily Position Report ; Fuel Daily Position

			Report
1-29	03/01/00	3720-3724	Power Supply Daily Position Report
1-30	03/02/00	3725-3729	Power Supply Daily Position Report
1-31	03/03/00	3730-3734	Power Supply Daily Position Report
1-32	03/06/00	3735-3739	Power Supply Daily Position Report
1-33	03/07/00	3740-3744	Power Supply Daily Position Report
1-34	03/08/00	3745-3749	Power Supply Daily Position Report
1-35	03/13/00	3750-3754	Power Supply Daily Position Report
1-36	03/14/00	3755-3759	Power Supply Daily Position Report
1-37	03/15/00	3760-3764	Power Supply Daily Position Report
1-38	03/16/00	3765-3769	Power Supply Daily Position Report
1-39	03/17/00	3770-3774	Power Supply Daily Position Report
1-40	03/20/00	3775-3779	Power Supply Daily Position Report
1-41	03/22/00	3780-3784	Power Supply Daily Position Report
1-42	03/23/00	3785-3789	Power Supply Daily Position Report
1-43	03/24/00	3790-3794	Power Supply Daily Position Report
1-44	03/28/00	3795-3799	Power Supply Daily Position Report
1-45	03/29/00	3800-3804	Power Supply Daily Position Report
1-46	03/30/00	3805-3809	Power Supply Daily Position Report
1-47	03/31/00	3810-3814	Power Supply Daily Position Report
1-48	06/28/00	3815-3824	Power Supply Daily Position Report
1-49	08/14/00	3825-3834	Power Supply Daily Position Report
1-50	12/27/00	3835-3842	Fuel Daily Position Report

00006703
EL02-114-000

1-51	02/02/01	3843-3850	Fuel Daily Position Report
1-52	03/21/01	3851-3862	Power Supply Daily Position Report
1-53	05/07/01	3863-3875	Fuel Position Summary – Dth/Day
1-54	05/07/01	3876-3897	Power Position Summary – MWA
1-55	05/08/01	3898-3919	Power Position Summary – MWA
1-56	05/08/01	3920-3922	Fuel Position Summary – Dth/Day
1-57	05/09/01	3923-3925	Fuel Position Summary – Dth/Day
1-58	05/10/01	3926-3967	Power Position Summary – MWA ; Power PLR Book Summary; Power PLR Book Details; Power SPEC Book Summary ; Power SPEC Book Details
1-59	05/10/01	3968-3970	Fuel Position Summary – Dth/Day
1-60	05/11/01	3971-4004	Power Position Summary – MWA ; Power PLR Book Summary; Power PLR Book Details; Power SPEC Book Summary; Power SPEC Book Details;
1-61	05/11/01	4005-4028	Fuel Position Summary – Dth/Day ; Fuel PLR Book Summary; Fuel PLR Book Details; Fuel SPEC Book Summary; Fuel SPEC Book Details
1-62	05/14/01	4029-4078	Power Position Summary – MWA ; Power PLR Book Summary; Power PLR Book Details; Power SPEC Book Summary; Power SPEC Book Details; Fuel Position Summary – Dth/Day ; Fuel PLR Book Summary; Fuel SPEC Book Summary; Fuel PLR Book Details; Fuel SPEC Book Details
1-63	05/15/01	4079-4084	Fuel Position Summary – Dth/Day ; Fuel PLR Book Summary; Fuel SPEC Book Summary;
1-64	05/17/01	4085-4094	Power SPEC Book Details ; Power PLR Book Details;
1-65	05/17/01	4095-4121	Fuel Position Summary – Dth/Day ; Fuel PLR Book Summary; Fuel SPEC Book Summary; Power SPEC Book Summary; Power SPEC Book Details ; Power PLR Book Summary ; Power PLR Book Details ; Power Position Summary – MWA ; Power Position Summary – MWH
1-66	05/18/01	4122-4154	Power SPEC Book Details ; Power PLR Book Details; Power SPEC Book Summary; Power PLR Book Details; Power Position Summary – MWA ; Power Position Summary – MWH ; Power PLR Book Summary

00006704
EL02-114-000

1-67	05/18/01	4155-4178	Fuel Position Summary – Dth/Day ; Fuel PLR Book Summary; Fuel PLR Book Details; Fuel SPEC Book Summary ; Fuel SPEC Book Details
1-68	05/21/01	4179-4182	Power Position Summary - MWA
1-69	05/22/02	4183-4188	Fuel Position Summary – Dth/Day ; Fuel PLR Book Summary; Fuel SPEC Book Summary ;
1-70	05/23/01	4189-4226	Power Spec Book Details ; Power SPEC Book Summary; Power SPEC Book Details; Power PLR Book Details; Power PLR Book Summary; Power Position Summary – MWA ; Power Position Summary – MWH ; Fuel Position Summary – Dth/Day; Fuel PLR Book Summary; Fuel SPEC Book Summary
1-71	05/24/02	4227-4254	Power Position Summary – MWA ; Power Position Summary – MWA ; Power PLR Book Details ; Power SPEC Book Summary ; Power SPEC Book Details
1-72	05/24/01	4255-4260	Fuel Position Summary – Dth/Day ; Power Fuel PLR Book Summary ; Power SPEC Book Summary
1-73	05/25/01	4261-4292	Power Position Summary – MWA ; Power Position Summary – MWH ; Power PLR Book Summary ; Power PLR Book Details; Power SPEC Book Summary ; Power SPEC Book Details ;
1-74	05/25/01	4293-4315	Fuel Position Summary – Dth/Day ; Fuel PLR Book Summary; Fuel PLR Book Details; Fuel SPEC Book Summary ; Fuel SPEC Book Details
1-75	05/29/01	4316-4347	Power Position Summary – MWA ; Power Position Summary – MWH ; Power PLR Book Summary ; Power PLR Book Details; Power SPEC Book Summary ; Power SPEC Book Details
1-76	05/29/01	4348-4371	Fuel Position Summary – Dth/Day ; Fuel PLR Book Summary ; Fuel Power PLR Details; Fuel SPEC Book Summary; Fuel SPEC Book Details
1-77	05/30/01	4372-4403	Power Position Summary – MWA ; Power Position Summary – MWH; Power PLR Book Summary ; Power PLR Book Details; Power SPEC Book Summary; Power SPEC Book Details;
1-78	05/30/01	4404-4428	Fuel Position Summary – Dth/Day ; Fuel Position Summary – Beaver II Gas ; Fuel PLR Book Summary ; Fuel PLR Book Details; Fuel SPEC Book Summary ; Fuel SPEC Book Details
1-79	05/31/01	4429-4460	Power Position Summary – MWA ; Power Position Summary – MWH ; Power PLR Book Summary ; Power

0006705
EL02-114-000

			PLR Book Details; Power SPEC Book Summary ; Power SPEC Book Details;
1-80	05/31/01	4461-4485	Fuel Position Summary – Dth/Day ; Fuel PLR Book Summary ; Fuel PLR Book Details; Fuel SPEC Book Summary ; Fuel SPEC Book Details; Fuel Position Summary – Beaver II Gas
1-81	04/17/02	4486-4811	Copy of Electronic E-mail sent 4/17/02 – sending electronic spreadsheets to Marlene Stein
1-82	04/19/02	4812-4814	Copy of Electronic E-mail sent 4/19/02 to Kim Bruno – the March 27 responses to the March 15 Subpoena
1-83a	04/19/02	4815-5122	Letter to Kim Bruno following up in Hard Copy, PGE's response to the March 15 th Subpoena Supplements questions, 1, 6, 7, 12, 14, affidavit of Mary Turina, Hard copies power supply reports, fuel daily positions reports, power position summaries and fuel position summaries.
1-84	5/22/02	5123-5314	RESPONSE to the Commission's May, 8 2002 Data Request and Request for Admissions (contains Attach I.A.2, I.K.1-001 thru I.K.1-005, II.A., II.B (Know the ISO Event Reports dated 1/18/00, 1/19/00, 1/23/00, 8/25/00, 9/00, 10/00, 12/00, 12/8/00, --- Hardcopy of E-mail from Floyd Mullett to Joseph Taylor, E-mail from Marlene Huntsinger to Mary Turina, Answers to Path 26 Loading Conditions , E-mail from Tami Parr to Joseph Taylor , Preface to Employee Discussions, Kevin Nordt-Joseph Taylor e-mail, Joseph Taylor – <u>Jnickel@caiso.com</u> e-mail, Chris Hawkins to Schedulers e-mail, CA Term Trading Strategy, California ISO Bidding Policy document, Unscheduled Flow Mitigation Plan Reports for SCs, Robin Tompkins Memo to Tami Parr, Bill Casey e-mail to Robin Tompkins, Bill Casey. E-mail to Joseph Taylor, Joseph Taylor to Bill Casey . e-mail, Affidavit of Aubrey Williams Turner, Jr., LeBoeuf, Lamb memorandum to John Maas on Power Transaction, John Klauberg e-mail to AW Turner Memo from Peggy Fowler re: Production of Documents. Memo from Doug Nichols to all persons current and former, associated with the California Trade.
1-85	5/17/02	5315-5900	May 17, 2002 letter from LeBoeuf, Lamb, Greene & MacRae to AW Turner, dated May 17, 2002. (II.B-137 thru II.B-273, III.B Summary of Transactions Occuring During 17 Days between April 6 and June 6, 2000 – Study Dated May 21, 2002 (III.B-002 through III.B-445 – Telephone Transcripts), and Bill Casey Memo to Pownow.

00006706
EL02-114-000

----	----	----	Left blank intentionally
1-86	06/06/02	5901-5904	Letter dated June 6, 2002, from Peggy Fowler, to Pat Wood of FERC regarding RTO Issues in the Northwest and Portland General's work plan for responding to the June 4 Show Cause Order .
1-87	07/09/02	5905	Copy of E-mail transmission from Marlene Stein to AW Turner – receipt of faxed material.
1-88	07/09/02	5906-5907	Copy of E-mail transmission from AW Turner to Marlene Stein and others regarding Burbank transactions – Glendale transactions and spreadsheets for both.
1-88a	07/09/02	5908-5909	Letter to Marlene Stein re: PA02-02-000 – referring to July 3, 2002 conversation. Additional materials supplied. Details for both Burbank and Glendale purchases. (Physical commodity transaction input (faxed) Trade Ticket (faxed) counter-party's confirmation (faxed)
1-88b	07/09/02	5910-5919	Burbank documents
1-88c	07/09/02	5920-5947	Glendale documents
1-88d	07/09/02	5948-5952	Physical Commodity Transaction Input (copy) Bill Casey Trader (referred to in 1-88A above)
1-88e	07/09/02	5953-5954	Letter - City of Glendale Water and Power (Contract No. 140) dated 12/20/02
1-89	07/09/02	5955	E-mail copy from AW Turner to Marlene Stein 12:00 PM – discussing failure to include confidentiality provisions that contracts require....
1-90	N/A	5956	See below – identification of confidential items forwarded under separate transmittal
1-90a, 191, 192, 193 Listed Below (PROTECTED MATERIALS)			
1-94	02/15/02	5957-5959	Letter to Sam Behrends from Donald Gelinis requesting copies of all contracts for (1) wholesale electric energy and/or capacity and/or ancillary sales and purchases, and (2) retail sales of electricity to which any Enron affiliate or subsidiary is a party (pursuant to February 13, 2002 Commission Order)
1-94a	Various Dates	5960-6004	Data Requests and/or Orders for Information directed from FERC through Docket No. PA02-2-000 2/15/02 (See Item No. 1-94 above) 3/05/02 to All Jurisdictional Sellers and All Non-jurisdictional Sellers in the West

			<p>3/15/02 to Sam Behrends from FERC (Subpoena duces tecum)</p> <p>5/08/02 to Sellers of Wholesale Electricity and/or Ancillary Services to the California Independent System Operator and/or the California Power Exchange During the Years 2000 and 2001</p> <p>5/16/02 to Sellers of Wholesale Electricity and/or Ancillary Services to the California Independent System Operator and/or the California Power Exchange during the years 2000-2001</p> <p>5/21/02 to Sellers of Wholesale Electricity and/or Ancillary Services in the United States Portion of the Western Systems Coordinating Council During the Years 2000-2001</p> <p>5/22/02 to all Sellers of Natural Gas in the U.S. Portion of the Western Systems Coordinating Council and/or Texas During the Years 2000-2001</p> <p>06/04/02 Order to Show Cause Why Market-Based Rate Authority Should Not Be Revoked</p>
1-95	02/28/02	6005-6020	Letter to Donald Galinas (Response of Portland General to Staff's Data Request dated Feb. 15, 2002.
1-96	03/05/02	6021-6026	Letter to Sam Behrends from AW Turner providing two additional contracts responsive to Staff's February 15, 2002 data request.
1-97	04/19/02	6027	Letter to William Booth from AW Turner responding to FERC's March 5 th request. Attachments include PGE Long-Term Contracts
1-97a	04/19/02	6028-6063	Attachment to April 19, 2002 letter (item No. 1-97) March 18, 1999 Transaction Confirmation to AVISTA
1-97b	04/19/02	6064-6078	Attachment to April 19, 2002 letter (item No. 1-97) with attachment letter dated June 5, 1961 from H.H. Phillips to Portland General Electric – fully executed counterpart agreement between Pacific Power & Light Company and Portland General Electric Company dated 6/2/1961 and information relating to the Cove power plant of the Round Butte Project backwaters
1-97c	04/19/02	6079 - 6127	Attachment to April 19, 2002 letter (item 1-97) Long Term Power Sale Agreement between San Diego Gas & Electric Company and Portland General Electric Company dated 11/05/85(SDG&E Transaction No. 85-0235)

			This row intentionally left blank
1-97d	04/19/02	6128-6209	Attachment to April 19, 2002 letter (item 1-97) Long Term Power Sale and Exchange Agreement with the City of Glendale dated 2/14/02 (PGX)
1-97e	04/19/02	6210-6224	Attachment to April 19, 2002 letter (item 1-97) Power Sale Agreement between PGE and Eugene Water & Electric Board dated July 27, 1995
1-97f	04/19/02	6225-6251	Attachment to April 19, 2002 letter (item 1-97) --Contract between PGE and Pacific Northwest Generating Cooperative (Dated 6/14/96 and effective date of 8/01/96)
1-97g	04/19/02	6252-6272	Attachment to April 19, 2002 letter (item 1-97) --Surplus Firm Energy Sale Agreement between Bonneville Power Administration and Portland General Electric Company [Contract No. 96MS-95273, 6/11/96]
1-97h	04/19/02	6273-6288	Attachment to April 19, 2002 letter (item 1-97) --Power Sale Agreement between Portland General Electric Company and Public Utility District No. 1 of Snohomish County [PGE Audit No. 42507, dated 8/28/96]
1-97i	04/19/02	6289-6294	Attachment to April 19, 2002 letter (item 1-97) --Letter of 9/18/96 to Fred Mitchell of PUD No. 1 of Clallam County, Washington from R. G. Davis, dated 9/23/96 discussing a Service Agreement under PGE's General Interchange Tariff
1-97j	04/19/02	6295-6318	Attachment to April 19, 2002 letter (item 1-97)—Summer Power Sale Agreement between Portland General Electric Company and City of Burbank dated 12/17/1998
1-98	05/31/02	6319-6333	Letter with Response of Portland General Electric Company to May 21, 2002 Data Request and Request for Admissions issued to Sellers of Wholesale Electricity and/or Ancillary Services. [PA02-2-000]
1-99	06/05/02	6334-6344	Letter to Donald Gelinas from Cheryl Foley filing response of Portland General Electric Company to the May 22, 2002 Data Request and Request for Admissions issued to Sellers of Natural Gas in the United States of the WSCC and/or Texas during the years 2000-2001
1-100		4831-4940	Copies of e -mail transmission of electronic files in response to Data Request No. 12 consisting of Energy Trading Policies and Procedures for April 2000, May 2001, September 2001, and February 2002
1-100-2		6345-6356	Materials hand delivered to Andrea Wolfman on April 15, 2002 by AW Turner. Includes Narrative Description of PGE/EPMI Term Transactions and additional attachments

00006709
EL02-114-000

---	---	---	This row left blank intentionally
<p>THE FOLLOWING MATERIALS are PROTECTED MATERIALS and Confidential. They were supplied to FERC Staff and the parties on the Restricted Service List who signed the Non Disclosure Certificate only, and under separate cover.</p>			
1-90	08/01/02 and 8/01/02	6678-6695	Copy of E-mail transmission from Tina Tippin discussing letter and spreadsheet relating to the PGE/EPMI transactions for 1999, 2000 and 2001 – Hard copy of letter dated 8/01/02 (referred to in 1-90 above) - (CONFIDENTIAL – sent under separate transmission)
1-91	06/14/02	1370-1586	Response in letter form and Pleading form – contains confidential information – Bates Series 00001370 through 00001586 (CONFIDENTIAL – sent under separate transmission)
1-92	06/25/02	1587-2964	First Supplemental Response in letter form and Pleading form – contains confidential information - Bates Series 00001587 through 00002964 (CONFIDENTIAL – sent under separate transmission)
1-93	06/27/02	2965-3277	Second Supplemental Response in letter form and Pleading form - Bates Series 00002965 through 00003277 (CONFIDENTIAL – sent under separate transmission)
9/20/02	CD1-6696	Glendale/ Burbank Data PA02-2-000 Item 1-88 above	
	CD5-6697	Responses of PGE to 3/5/02 Subpoena duces tecum	
	CD2-1368	Attachments to PGE Response to 3/15 Subpoena - Includes: DPR, Gas Position Reports, Power Position Reports – Price Curves – DPR and Directions	
	CD-1369	Protected Materials - In Response to 6/04/02 Order to Show Cause. Includes: Cap Hour Chart.xls, EPMI Parking and Lending Details.xls, Final Screen analysis.xls, Portland's Parking and Lending Transactions, Purchase and Sale Data, PX and ISO Price Caps, PX and ISO Purchases, Read Me – Confidential Statement , Screen Analysis Notes, and Transmission Screen Analysis	
	CD4-3478	Electronic files (confidential and non-confidentially submitted) in response to 3/05/03 Subpoena duces tecum. Includes: Long-term WSCC sales; short-term WSCC sales and monthly WSCC sales	

00006710
EL02-114-000

Attachment 001-B
(Hard copies of non-confidential responses and materials)

00006711
EL02-114-000