

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

Fact-Finding Investigation of Potential)	Docket No. PA02-2-000
Manipulation of Electric and Natural Gas)	
Prices)	
_____)	

**RESPONSE OF SEMPRAS ENERGY SOLUTIONS TO
STAFF'S FIRST SET OF DATA REQUESTS**

Pursuant to the letter dated May 21, 2002 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, Sempra Energy Solutions submits its responses as set forth below. These responses are submitted on behalf of Sempra Energy Solutions alone. Sempra Energy Solutions believes that responses will be separately provided by any affiliates that fall within the criteria set forth by in the May 21, 2002 letter. Sempra Energy Solutions further reserves the right to supplement or modify any or all of its responses if warranted by the discovery of additional information.

I. Requests for Admission ("RFA")

RFA A.: Admit or Deny: The company engaged in activities referred to as "wash," "round trip" or "sell/buyback" trading. This trading involves the sale of an electricity product to another company together with a simultaneous purchase of the same product at the same price.

Response: Deny.

RFA B.: If you so admit, provide transaction by transaction details for all such transactions your company engaged in, including, but not limited to, the following:

1. Indicate the methods and rationale used to arrive at the value or compensation of such transactions.

2. Indicate whether any such transactions were reported to Platt's, Bloomberg, or any organization that monitors, publishes or reports trading data (including bid-and-ask data) or publishes or reports prices or forward indices.
3. Identify all such transactions referred to in question 3 that were so published or reported, or were disseminated in any manner.
4. Identify all traders that participated in such transactions, by name and position within your company, if employed by you, or by name and affiliation if they were not or are not presently employed by your company.
5. Identify how such transactions were executed (e.g., whether an electronic platform was used to initiate the sale, with the buy transaction subsequently arranged through a broker or by telephone).
6. Describe all policies and procedures implemented to prevent future transactions of this type.

Response: Not Applicable.

II. Requests for Production of Documents

To the extent your company engaged in "wash," "round trip," or "sell/buyback" type transactions, provide the following documents:

Request A: Provide copies of all communications or correspondence, including e-mail messages, instant messages, or telephone logs, between your company and any other company (including your affiliates or subsidiaries) that refer or relate to this activity.

Response: Not Applicable.

Request B: Provide copies of all material, including, but not limited to, opinion letters, memoranda, communications (including e-mails and telephone logs), or reports, that address or discuss your company's knowledge of, awareness of, understanding of, or employment or use of any of any such transactions in the U.S. portion of the WSCC during the period 2000-2001.

To the extent that you wish to make a claim of privilege with respect to any responsive material, please provide an index of each of those materials, which includes the date of each individual document, its

title, its recipient(s) and its sender(s), a summary of the contents of the document, and the basis of the claim of privilege.

Response: Not Applicable.