

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

Fact-Finding Investigation of Potential )  
Manipulation of Electric and Natural Gas )  
Prices )  
 )  
 )  
 )

---

Docket No. PA02-2-000

**RESPONSE OF SEMPRA ENERGY SOLUTIONS TO  
STAFF’S DATA REQUEST DATED MAY 22, 2002**

Pursuant to the letter dated May 22, 2002 to Sellers of Natural Gas in the United States Portion of the Western Systems Coordinating Council and/or Texas 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 22, 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 natural gas 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. For each transaction, indicate whether that transaction was 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 each trader that devised or participated in such transactions, by name and position within your company, if employed by you. If not employed by you, identify each trader's name and affiliation. For each former trader, state their last known home address and telephone number.
4. Identify how such transactions were executed (e.g., whether an electronic platform was used to initiate the sale or purchase, with the purchase or sale transaction subsequently arranged through a broker or by telephone).
5. Describe all policies and procedures that have been 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:

- 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. Provide the copies in electronic format.

**Response:** Not Applicable.

- 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 and/or Texas during the period 2000-2001.

**Response:** Not Applicable.