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BEFORE THE

FILING CLERK

PUBLIC UTILITY COMMISSION

REPORT OF THE ELECTRIC
RELIABILITY COUNCIL OF TEXAS
(ERCOT) TO THE PUCT
REGARDING
IMPLEMENTATION OF THE
ERCOT PROTOCOLS

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OF TEXAS

**JOINT MOTION OF
THE CITY OF AUSTIN D/B/A AUSTIN ENERGY
AND BRAZOS ELECTRIC POWER COOPERATIVE SEEKING CLARIFICATION OF
ORDER NO. 11 REGARDING SCOPE OF TECHNICAL CONFERENCE**

COME NOW the City of Austin d/b/a Austin Energy, and Brazos Electric Power Cooperative, Inc. (collectively, "Joint Movants") and file this motion seeking clarification of the scope of the technical conference scheduled in this proceeding pursuant to Order No. 11 issued on June 24, 2002. In support of their Joint Motion, Joint Movants would show as follows:

From remarks made by the Commissioners at the Open Meeting of June 20th, it is not clear to Joint Movants that the issues which are of most concern to Joint Movants, related to Preassigned Transmission Congestion Rights ("PCRs"), are intended to be within the scope of the technical conference scheduled for July 19. The Commissioners appeared to be most desirous of having additional technical information regarding issues related to balancing schedules and ERCOT's ability to undertake additional responsibilities in this regard, and not issues related to PCRs. The PCR issues have been thoroughly briefed over the past six months by all parties, and Joint Movants believe the Commissioners have adequate information before them to allow them to make a decision.

Joint Movants are willing to provide additional information through their participation at the technical conference with respect to PCR issues if the Commissioners so desire, but they are reluctant to make preparations for such participation, which may include retaining and preparing an expert witness on a short time schedule, if in fact the PCR issues will not be a focus for the technical conference and its sole or primary objective will be to elicit additional information relating to balanced schedule concerns and other issues relating to ERCOT capabilities in implementing the ERCOT Protocols. Joint Movants believe the technical conference can be

more efficiently and economically prepared for and conducted if some guidance is forthcoming related to the scope of issues to be addressed at the technical conference.

Joint Movants additionally note that they are not waiving any rights accorded them by the Administrative Procedure Act ("APA"), and that in whatever proceedings that occur all due process required by law must be duly given in accord therewith.

WHEREFORE, PREMISES CONSIDERED, Joint Movants request that Order No. 11 be clarified to delineate more specifically the scope of issues to be addressed in any technical conference, with particular reference to whether issues related to PCRs as already briefed by all parties are to be addressed, and for such other relief to which Joint Movants may show themselves entitled.

Please note that the below-signed counsel for Austin Energy is authorized to sign this document for all of the Joint Movants, who have participated in the drafting of this motion and fully support its content and prayer for relief.

Respectfully submitted,

CITY OF AUSTIN d/b/a AUSTIN ENERGY

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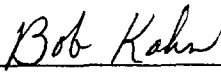
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I. CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document was served on all parties of record in this proceeding on this the 28th day of June 2002, by facsimile, first class, U.S. Mail, postage prepaid, or by hand delivery.



Bob Kahn