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DOCKET NO. 24770

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

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BEFORE THE
PUBLIC UTILITY COMMISSION
OF TEXAS

PUBLIC UTILITY COMMISSION
FILING CLERK

**CITY PUBLIC SERVICE OF SAN ANTONIO'S REPLY TO INITIAL COMMENTS SUBMITTED
PURSUANT TO ORDER NO. 13**

City Public Service of San Antonio ("San Antonio") files these comments in reply to the initial comments submitted by the Office of Public Utility Counsel ("OPC") and the Staff of the Public Utility Commission of Texas ("PUCT Staff") pursuant to Order No. 13.

In its comments, OPC recommends that ERCOT be allowed to enter into long-term contracts with load and generation to provide ancillary services. This proposal has significant financial implications for all market participants and these implications have not been subjected to review in this docket. Therefore, San Antonio submits that this issue is beyond the scope of this proceeding and, to the extent the Commission wishes to address this issue, it should do so in a separate proceeding.

The PUCT Staff in its comments proposes that the offer cap expiration date of July 4, 2003 approved by the Commission in Docket No. 23220 be repealed by the Commission in this proceeding. This proposal, having been raised for the first time in the PUCT Staff's comments in response to Order No. 13, is also beyond the scope of issues before the Commission in this proceeding, and should be addressed in a separate proceeding should the Commission desire to do so.

Date: August 13, 2002

Respectfully submitted,

MATTHEWS AND BRANSCOMB
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By: 
ATTORNEYS FOR SAN ANTONIO CITY PUBLIC
SERVICE BOARD

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document was served on all parties of record by deposit in the United States Mail, postage prepaid, by express mail, and/or by hand delivery on this 13th day of August 2002.


W. Roger Wilson