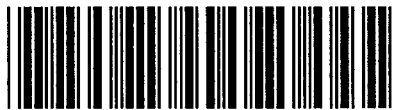




Control Number: 24770



Item Number: 232

Addendum StartPage: 0

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

§ PUBLIC UTILITY COMMISSION  
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§  
§ OF TEXAS

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**FRONTERA GENERATION LIMITED PARTNERSHIP'S**  
**PETITION FOR LEAVE TO INTERVENE**

Frontera Generation Limited Partnership ("Frontera") respectfully requests that leave be granted for its intervention in the above-styled docket pursuant to the Public Utility Commission ("Commission") Procedural Rules 22.102, 22.103 and 22.104 and in support hereof shows the following:

1. Frontera owns a generating facility located in the South Zone of ERCOT, which is registered with the Commission. Frontera is a person within the meaning of PUC Proc. R. §22.103. Frontera is a Market Participant in the Electric Reliability Council of Texas ("ERCOT") and is an ERCOT Member, as those terms are defined in the ERCOT Protocols. Frontera is an active participant in the ERCOT market and is involved in the various committees at ERCOT. As a generating entity within ERCOT, Frontera will be directly affected by, and has a justiciable interest in, the modification of the ERCOT Protocols through the implementation of the Modified Competitive Solution Method ("CSM") or the City Public Service Board of San Antonio ("CPSB") or Reliant Resources Inc. ("Reliant") proposals which have recently been presented to the Commission in this docket.

2. Frontera's authorized representative herein is:

232

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Haynes and Boone LLP  
112 E. Pecan Street, Suite 1600  
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3. This docket was initiated by ERCOT through its filing of a report to the Commission providing a status report on the implementation of the ERCOT Protocols. In Order No. 19, issued in the above-styled docket on April 23, 2003, the Commission requested comments on additional proposals made by CPS and Reliant, as well as on the recently modified CSM method proposed by the Market Oversight Division, and convened a technical conference on these new proposals.

4. Although the deadline for filing a timely intervention has passed, given the nature of the new proposals which will now be considered by the Commission and the Commissioners' request at the last Open Meeting for the stakeholders to evaluate the proposals for price mitigation in the context of a technical conference which has been convened on May 14, 2003, Frontera respectfully requests that its Petition for Leave to Intervene be granted.

5. Other than the technical conference tomorrow, no procedural schedule has been set and no party will be prejudiced by the late intervention of Frontera. The granting of Frontera's Petition for Leave to Intervene will serve the public interest in that Frontera's perspective will enhance the Commission's review of the issues by providing additional information to the Commission and the views of an independent generator in the South Zone.

6. Frontera requests that all correspondence, pleadings, requests for information, responses to requests for information, and other documents in this proceeding be served upon Frontera's authorized representative.

7. Frontera respectfully requests that its Petition for Leave to Intervene be granted in all respects, and that Frontera be granted party status and the right to participate fully in this docket.

RESPECTFULLY SUBMITTED,

Diana M. Liebmann w/ Permission:  
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Certificate of Service

I certify that a copy of this documents was served on all parties of record in this proceeding on May 13, 2003, by regular mail, facsimile transmission or hand delivery.

Diana M. Liebmann w/ Permission:  
Diana M. Liebmann  
Devon Green