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PUC DOCKET NO. 26311

APPEAL BY FRONTERA §  
GENERATION LIMITED §  
PARTNERSHIP OF ELECTRIC §  
RELIABILITY COUNCIL OF TEXAS §  
APPROVED PROTOCOL REVISION §  
NOS. 338 AND 347 §

PUBLIC UTILITY COMMISSION  
OF TEXAS

APR 20 11:10  
PUBLIC UTILITY COMMISSION  
CLERK

MOTION FOR CHANGE OF SERVICE REQUIREMENTS

TO THE HONORABLE PUBLIC UTILITY COMMISSION OF TEXAS:

COMES NOW, Electric Reliability Council of Texas, Inc. ("ERCOT"), one of the Parties in the above-captioned matter, and files this *Motion for Change of Service Requirements* and respectfully shows the following:

It was made clear at the prehearing conference on February 3, 2003 that parties in this Docket desire timely (same day) notice of new filings. Therefore, parties agreed to service via facsimile, as is reflected in *Order No. 11* in this Docket. However, ERCOT has now determined that facsimile service is not feasible for lengthy filings. Due to time and equipment constraints, ERCOT was forced to perform service via first class mail and email in order to provide notice to all parties in this Docket of its filing on February 24. This filing was especially problematic because many other parties were faxing responses on the same day. Therefore, ERCOT requests that service to other parties in this Docket be by means of either (1) facsimile or (2) email AND first class mail. This will ensure timely notification for all parties in this Docket of new filings and will prevent fax machine constraints from becoming an issue for lengthy filings in the future.

The following parties have indicated that they do not oppose this Motion: Texas Industrial Energy Consumers, Occidental Chemical Corporation, Occidental Permian, LLP, San Antonio City Public Service, Reliant Resources, Inc., Public Utilities Board of the City of Brownsville, Constellation Power Source, Inc. and Frontera Generation LP.

**Prayer**

For the reasons stated above, ERCOT respectfully requests that service on parties to this Docket by first class mail plus email be allowed as an option in addition to service via facsimile.

Respectfully Submitted,

Electric Reliability Council of Texas, Inc.

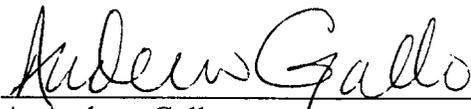
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### CERTIFICATE OF SERVICE

I, A. Andrew Gallo, Attorney for ERCOT, certify that a copy of this document was served on all parties of record in this proceeding on February 28, 2003, in the following manner: facsimile.

  
A. Andrew Gallo