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3. Documents responsive to requests for production that are Protected Materials or Highly Sensitive Protected Materials shall be made available subject to a protective order.

DATE: December 17, 2008

Respectfully Submitted,

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CERTIFICATE OF SERVICE

I certify that a copy of this document will be served on all parties of record on this 17th day of December, 2008, in accordance with P.U.C. Procedural Rule 22.74.



Paul A. Curtis

PRODUCTION REQUESTS

6-2. Reference discussion beginning p. 61, I. 1. Please provide all frequency bias calculations for IPA made by ERCOT for each Frequency Event during the penalty period.

Staff's Third Supplemental Response to IPA 6th RFIs, question IPA 6-2

This response supplements Staff's previous responses. Please refer to ERCOT's Response to Commission Staff's Subpoena and First Request For The Production of Books, Papers, or Other Objects, Question No. 1, filed October 28, 2008, for ERCOT calculated frequency biases of the ANP Funding I IPA portfolio for each Frequency Event from May 3, 2004, to the end of April 4, 2005, and for the data underlying these frequency bias calculations.

Sponsoring witness: Danielle Jaussaud

Response prepared by: Danielle Jaussaud and Paul Curtis

6-9. Reference the discussion at p. 67, 1. 19. Please identify and produce all the "ERCOT data" showing that the frequency bias of ANP portfolio resources was not zero when ANP reported to ERCOT that it was zero.

Staff's Third Supplemental Response to IPA 6th RFIs, question IPA 6-9

This response supplements Staff's previous responses. For the period starting April 5, 2005 until the end of May 2006, "ERCOT data" including underlying data for ERCOT's calculations of the ANP Funding I portfolio of resources frequency bias, showing that the frequency bias was not zero when ANP reported to ERCOT that it was zero during Measurable Frequency Events, was provided in Staff's Second Supplemental Responses to IPA-6-9 and IPA-6-2, filed on October 6, 2008. For the period starting May 3, 2004, to the end of April 4, 2005, the data was provided by ERCOT to Staff and IPA Parties in ERCOT's Response to Commission Staff's Subpoena and First Request For The Production of Books, Papers, or Other Objects, Question No. 1, filed October 28, 2008.

Sponsoring witness: Danielle Jaussaud

Response prepared by: Danielle Jaussaud and Paul Curtis

6-30. Confirm that Attachment DJ-28 lists all days and times in which you allege that ANP QSE reported a "zero" frequency bias to ERCOT, but ANP's portfolio provided governor response. If there are any others please provide. Identify the person or entity who calculated the "ERCOT calculated Frequency Bias". If done by Ms Jaussaud please identify her methodology and provide all calculations, workpapers and spreadsheets. If calculated by ERCOT, please produce all documents produced by ERCOT in connection with same.

Staff's Third Supplemental Response to IPA 6th RFIs, question IPA 6-30

This response supplements Staff's previous response. Attachment DJ-28 does not list all days and times in which the ANP QSE "ANP Funding" reported a "zero" frequency bias to ERCOT, and ANP's portfolio provided governor response. It lists all days and times in which the ANP QSE "ANP Funding" reported a "zero" frequency bias to ERCOT *during Measurable Frequency Events when ERCOT calculated that the ANP QSE frequency bias was not zero since April 2005, as recorded by ERCOT.*

Additional days and times in which ANP QSE reported a "zero" frequency bias to ERCOT during Measurable Frequency Events when ERCOT calculated that the ANP QSE frequency bias was not zero were provided in Staff's responses to IPA-6-2.

These days and times (provided in DJ-28 and in Staff's responses to IPA-6-2) are only a subset of all the days and times in which Staff contends that the ANP QSE "ANP Funding" reported a "zero" frequency bias to ERCOT since the data is limited to Frequency Events with a frequency deviation of 0.1 Hz or higher.

Days and times in which the ANP QSE "ANP Funding" reported a zero frequency bias to ERCOT, and when the frequency deviation was outside the +/- 0.036 Hz deadband and one or more IPA units were on line, are provided in Danielle Jaussaud's Testimony, Exhibit DJ-30. Exhibit DJ-30 provides all the days and times when IPA failed to provide a real time frequency bias as required by ERCOT Protocols § 6.5.1.1(1)(e).

Days and Times in which the ANP QSE "ANP Funding" reported a "zero" frequency bias to ERCOT, the system frequency was outside the +/- 0.036 Hz deadband, and the frequency deviation was less than +/- 0.1 Hz, but ANP's portfolio provided a governor response were not compiled by Staff or by ERCOT, and therefore were not provided.

For ERCOT data underlying the ERCOT calculation of IPA's frequency bias during the period starting April 5, 2005 through the end of May 2006, please refer to Staff's responses to IPA-6-2 and IPA-6-9.

For ERCOT data underlying the ERCOT calculation of IPA's frequency bias during the period starting May 3, 2004 and ending April 4, 2005, please refer to ERCOT's Response to

Commission Staff's Subpoena and First Request For The Production of Books, Papers, or Other Objects, Question No. 1, filed October 28, 2008.

Sponsoring witness: Danielle Jaussaud

Response prepared by: Danielle Jaussaud and Paul Curtis