



Control Number: 34738



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Addendum StartPage: 0

SOAH DOCKET NO. 473-08-1153
DOCKET NO. 34738

NOTICE OF VIOLATION OF §
INTERNATIONAL POWER §
AMERICA, INC., HAYS ENERGY §
LIMITED PARTNERSHIP, §
MIDLOTHIAN ENERGY LIMITED §
PARTNERSHIP, AND ANP FUNDING §
I, LLC OF PURA §36.151(j) AND PUC §
SUBST. R. §25.503(f) AND (g), §
RELATING TO FAILURE TO §
ADHERE TO ERCOT PROTOCOLS §
§5.8.1.1, AND 6.5.1.1(1)(e) §
CONCERNING GOVERNOR IN §
SERVICE REQUIREMENTS AND §
FREQUENCY BIAS §
REQUIREMENTS AND OF PUC §
SUBST. R. 25.503(f)(10), RELATING §
TO FAILURE TO COMPLY WITH §
REQUESTS FOR INFORMATION BY §
ERCOT WITHIN THE TIME §
SPECIFIED BY ERCOT §
INSTRUCTIONS §

BEFORE THE STATE OFFICE OF
ADMINISTRATIVE HEARINGS

2008 MAY 29 PM 2:37

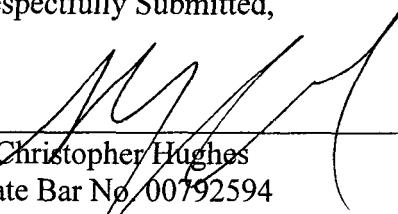
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FILING CLERK

**INTERNATIONAL POWER AMERICA, INC., HAYS ENERGY LIMITED
PARTNERSHIP, MIDLOTHIAN ENERGY LIMITED PARTNERSHIP, AND ANP
FUNDING I, LLC SUPPLEMENTAL RESPONSE TO COMMISSION STAFF'S SIXTH
SET OF REQUESTS FOR INFORMATION**

International Power America, Inc., Hays Energy Limited Partnership, Midlothian Energy Limited Partnership, and ANP Funding I, LLC (collectively "IPA") files their Supplemental Response to Commission Staff's Sixth Request for Information. These answers may be treated by all parties as if the answers were filed under oath.

Respectfully Submitted,

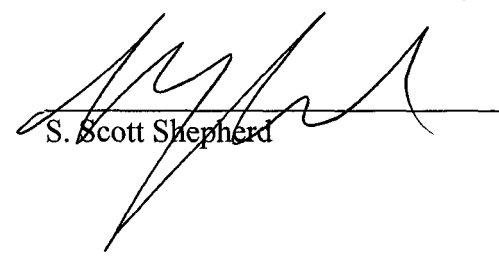
By: _____


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ATTORNEYS FOR INTERNATIONAL
POWER AMERICA, INC., HAYS
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MIDLOTHIAN ENERGY LIMITED
PATNERSHIP, AND ANP FUNDING I,
LLC

Certificate of Service

I certify that a copy of this document was served on all parties of record in this proceeding on May 29, 2008, by regular mail, facsimile transmission or hand-delivery.


S. Scott Shepherd

**SUPPLEMENTAL RESPONSE
MAY 29, 2008**

Q. DJ-6-2 Please provide the training materials for the 19th Annual ERCOT Operations Training Seminar that Mr. Knisley and Mr. Shaw attended. Provide the dates when Mr. Knisley and Mr. Shaw attended the seminars.

Did IPA Parties personnel attend any ERCOT training seminar in 2007 and/or 2008? If so, please provide the name and title of the persons who attended such seminars and the title and date of the seminar.

R. DJ-6-2 Upon further review IPA responds as follows:

Jon Segal – Real Time Manager, 2007
Jon Segal – Energy Trader, 2008
Brian McIntosh – Energy Trader, 2007 and 2008
Eric Palmer – Energy Trader, 2007 and 2008
Matt Fahey – Energy Trader, 2007 and 2008
Chris Kavanagh – Energy Trader, 2007
Ken Lysik – Energy Trader, 2008
James Preedy – Energy Trader, 2008

Prepared by: Mike Novelli

Sponsoring Witness: Mike Novelli