



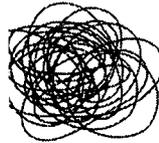
0000101408

Arizona Corporation Commission

DOCKETED

JUL -2 2002

DOCKETED BY	<i>WR</i>
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AES NewEnergy

June 28, 2002

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2002 JUL -2 A 10: 17

AZ CORP COMMISSION
DOCUMENT CONTROL

2802

Chairman William A. Mundell
 Arizona Corporation Commission
 1200 West Washington
 Phoenix, AZ 85007

E-00000A-02-0051
 E-01345A-01-0822
 E-00000A-01-0630
 E-01933A-02-0069
 E-01933A-98-0471

Re: ACC Docket No. E-00000A-02-0051 Generic Proceedings for Electric Restructuring

Dear Chairman Mundell:

In response to your letter of May 14, 2002, attached are the responses filed by AES companies to Data Requests of May 8, 2002, and May 21, 2002, in FERC Docket No. PA02-2-000. AES companies filing responses were AES NewEnergy, Inc., AES Placerita, Inc., Delano Energy Company, Inc., Mountainview Power Company, and Riverside Canal Power Company.

Sincerely,

Aaron Thomas

Aaron Thomas
 Vice President
 AES NewEnergy, Inc.

Original and 18 copies filed
 June 28, 2002, with:
 Arizona Corporation Commission
 400 West Congress
 Tucson, AZ 85701-1347

08/26/2002 14:44 FAX 202 887 0783

MORRISON & FOERSTER

MORRISON & FOERSTER LLP

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BRUSSELS
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HONG KONG
SINGAPORE
TOKYO

May 22, 2002

Writer's Direct Contact
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R.Loeffler@mofa.com

By Messenger

Donald J. Gelinas
Associate Director
Office of Markets, Tariffs and Rates
Federal Energy Regulatory Commission
888 First Street, N.E.
Washington, D.C. 20426

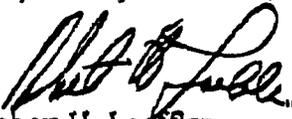
*Re: Fact-Finding Investigation of Potential Manipulation of Electric and
Natural Gas Prices. Docket No. PA02-2-000*

Dear Mr. Gelinas:

Enclosed please find the answers in the prescribed form of AES NewEnergy, Inc., AES Placerita, Inc., Delano Energy Company, Inc., Mountainview Power Company, and Riverside Canal Power Company (the "AES Companies") to the Data Requests of May 8, 2002, in the referenced docket.

Any questions with respect to this matter should be directed to the undersigned

Respectfully submitted,



Robert H. Loeffler
Attorney for
The AES Companies

Enclosures

Fact-Finding Investigation of)
Potential Manipulation of Electric)
and Natural Gas Prices)

Docket No. PA02-2-000

AFFIDAVIT OF CLEM PALEVICH

I, Clem Palevich, being duly sworn, hereby state under oath as follows:

1. I am the President of AES NewEnergy, Inc. I make this affidavit to the best of my knowledge, information, and belief formed after a thorough and diligent investigation under my supervision and control into the trading activities of AES NewEnergy, Inc. and its agents and employees, in the U.S. portion of the WSCC during the years 2000 and 2001.

2. AES NewEnergy, Inc. responds to the specific requests for admissions contained in the May 8, 2002 memorandum from Donald J. Gelinas (attached hereto), as follows:

- 3. Request No. A.1. Denied.
- 4. Request No. B.1. Denied.
- 5. Request No. C.1. Denied.
- 6. Request No. D.1. Denied.
- 7. Request No. E.1. Denied.
- 8. Request No. F.1. Denied.
- 9. Request No. G.1. Denied.
- 10. Request No. H.1. Denied.
- 11. Request No. I.1. Denied.
- 12. Request No. J.1. Denied.
- 13. Request No. K.1. Denied.

14. AES NewEnergy, Inc. has no documents in its possession, custody or control that are responsive to Requests for Production of Documents Nos. II.A. and II.B

15. AES NewEnergy, Inc. responds as follows to Requests for Other Information No. III.A.: No.

16. AES NewEnergy, Inc. responds as follows to Requests for Other Information No. III.B.: No.



Clem Palevich

SUBSCRIBED AND SWORN TO BEFORE
ME THIS 20th DAY OF MAY, 2002.


Notary Public

(Please see attached)

CALIFORNIA ALL-PURPOSE ACKNOWLEDGMENT

State of California

County of Los Angeles

On 5/20/2002 before me, Marissa Ruelas, Notary Public

DATE

NAME, TITLE OF OFFICER - E.G. "JANE DOE, NOTARY PUBLIC"

personally appeared _____

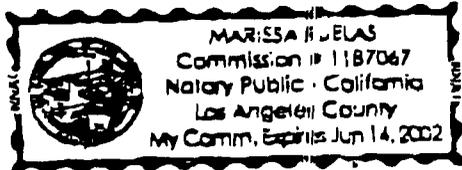
NAME OF SIGNER(S)

_____ personally known to me OR _____ proved to me on the basis of satisfactory evidence

to be the person(s) whose name(s) is/are subscribed to the within instrument and acknowledged to me that he/she/they executed the same in his/her/their authorized capacity (ies), and that by his/her/their signature(s) on the instrument the person(s), or the entity upon behalf of which the person(s), acted, executed the instrument.

WITNESS my hand and official seal.

Marissa Ruelas
SIGNATURE OF NOTARY



OPTIONAL

Though the data below is not required by law, it may prove valuable to persons relying on the document and could prevent fraudulent reattachment of this form.

CAPACITY CLAIMED BY SIGNER	DESCRIPTION OF ATTACHED DOCUMENT
<input type="checkbox"/> INDIVIDUAL	_____ TITLE OR TYPE OF DOCUMENT
<input type="checkbox"/> CORPORATE OFFICER	_____ NUMBER OF PAGES
_____ PARTNER(S) <input type="checkbox"/> LIMITED <input type="checkbox"/> GENERAL	_____ DATE OF DOCUMENT
<input type="checkbox"/> ATTORNEY-IN-FACT	_____ SIGNER(S) OTHER THAN NAMED ABOVE
<input type="checkbox"/> TRUSTEE(S)	
<input type="checkbox"/> GUARDIAN/CONSERVATOR	
<input type="checkbox"/> OTHER: _____	
<input type="checkbox"/> _____	
<input type="checkbox"/> _____	
SIGNER IS REPRESENTING:	
NAME OF PERSON(S) OR ENTITY(IES)	

Fact-Finding Investigation of)
Potential Manipulation of Electric)
and Natural Gas Prices)

Docket No. PA02-2-000

AFFIDAVIT OF JENNIFER LEHMANN

I, Jennifer Lehmann, being duly sworn, hereby state under oath as follows:

1. I am the Vice President of AES Placerita, Inc. I make this affidavit to the best of my knowledge, information, and belief formed after a thorough and diligent investigation under my supervision and control into the trading activities of AES Placerita, Inc. and its agents and employees, in the U.S. portion of the WSCC during the years 2000 and 2001.

2. AES Placerita, Inc. responds to the specific requests for admissions contained in the May 8, 2002 memorandum from Donald J. Gelinas (attached hereto), as follows:

- 3. Request No. A.1. Denied.
- 4. Request No. B.1. Denied.
- 5. Request No. C.1. Denied.
- 6. Request No. D.1. Denied.
- 7. Request No. E.1. Denied.
- 8. Request No. F.1. Denied.
- 9. Request No. G.1. Denied.
- 10. Request No. H.1. Denied.
- 11. Request No. I.1. Denied.
- 12. Request No. J.1. Denied.
- 13. Request No. K.1. Denied.

Fact-Finding Investigation of)
Potential Manipulation of Electric)
and Natural Gas Prices)

Docket No. PA02-2-000

AFFIDAVIT OF GEORGE HALL

I, George Hall, being duly sworn, hereby state under oath as follows:

1. I am the Plant Manager of Mountainview Power Company. I make this affidavit to the best of my knowledge, information, and belief formed after a thorough and diligent investigation under my supervision and control into the trading activities of Mountainview Power Company and its agents and employees, in the U.S. portion of the WSCC during the years 2000 and 2001.

2. Mountainview Power Company responds to the specific requests for admissions contained in the May 8, 2002 memorandum from Donald J. Gelinas (attached hereto), as follows:

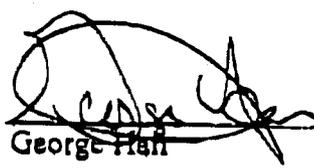
- 3. Request No. A.1. Denied.
- 4. Request No. B.1. Denied.
- 5. Request No. C.1. Denied.
- 6. Request No. D.1. Denied.
- 7. Request No. E.1. Denied.
- 8. Request No. F.1. Denied.
- 9. Request No. G.1. Denied.
- 10. Request No. H.1. Denied.
- 11. Request No. I.1. Denied.
- 12. Request No. J.1. Denied.

13. Request No. K.1. Denied.

14. Mountainview Power Company has no documents in its possession, custody or control that are responsive to Requests for Production of Documents Nos. II.A. and II.B.

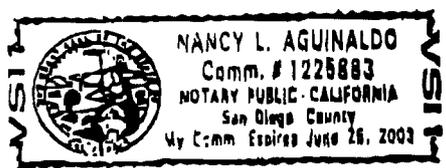
15. Mountainview Power Company responds as follows to Requests for Other Information No. III.A.:No.

16. Mountainview Power Company responds as follows to Requests for Other Information No. III.B.:No.


George Platt

SUBSCRIBED AND SWORN TO BEFORE
ME THIS 20TH DAY OF MAY, 2002.


Notary Public



Fact-Finding Investigation of)
Potential Manipulation of Electric)
and Natural Gas Prices)

Docket No. PA02-2-000

AFFIDAVIT OF GEORGE HALL

I, George Hall, being duly sworn, hereby state under oath as follows:

1. I am the Plant Manager of Riverside Canal Power Company. I make this affidavit to the best of my knowledge, information, and belief formed after a thorough and diligent investigation under my supervision and control into the trading activities of Riverside Canal Power Company and its agents and employees, in the U.S. portion of the WSCC during the years 2000 and 2001.

2. Riverside Canal Power Company responds to the specific requests for admissions contained in the May 8, 2002 memorandum from Donald J. Gelinas (attached hereto), as follows:

- 3. Request No. A.1. Denied.
- 4. Request No. B.1. Denied.
- 5. Request No. C.1. Denied.
- 6. Request No. D.1. Denied.
- 7. Request No. E.1. Denied.
- 8. Request No. F.1. Denied.
- 9. Request No. G.1. Denied.
- 10. Request No. H.1. Denied.
- 11. Request No. I.1. Denied.
- 12. Request No. J.1. Denied.

13. Request No. K.I. Denied.

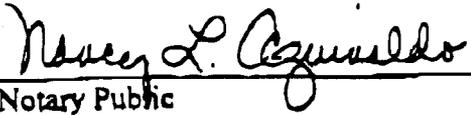
14. Riverside Canal Power Company has no documents in its possession, custody or control that are responsive to Requests for Production of Documents Nos. II.A. and II.B.

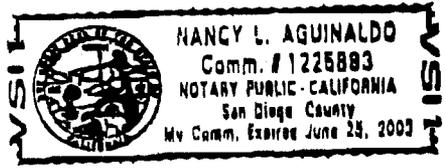
15. Riverside Canal Power Company responds as follows to Requests for Other Information No. III.A.: No.

16. Riverside Canal Power Company responds as follows to Requests for Other Information No. III.B.: No.


George Hall

SUBSCRIBED AND SWORN TO BEFORE
ME THIS 20TH DAY OF MAY, 2002.


Notary Public



Fact-Finding Investigation of)
Potential Manipulation of Electric)
and Natural Gas Prices)

Docket No. PA02-2-000

AFFIDAVIT OF DOYLE HIBLER

I, Doyle Hibler, being duly sworn, hereby state under oath as follows:

1. I am the Plant Manager of Delano Energy Company, Inc. I make this affidavit to the best of my knowledge, information, and belief formed after a thorough and diligent investigation under my supervision and control into the trading activities of Delano Energy Company, Inc. and its agents and employees, in the U.S. portion of the WSCC during the years 2000 and 2001.

2. Delano Energy Company, Inc. responds to the specific requests for admissions contained in the May 8, 2002 memorandum from Donald J. Gelinus (attached hereto), as follows:

- 3. Request No. A.1. Denied.
- 4. Request No. B.1. Denied.
- 5. Request No. C.1. Denied.
- 6. Request No. D.1. Denied.
- 7. Request No. E.1. Denied.
- 8. Request No. F.1. Denied.
- 9. Request No. G.1. Denied.
- 10. Request No. H.1. Denied.
- 11. Request No. I.1. Denied.
- 12. Request No. J.1. Denied.

13. Request No. K.1. Denied.

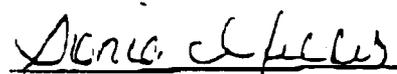
14. Delano Energy Company, Inc. has no documents in its possession, custody or control that are responsive to Requests for Production of Documents Nos. II.A. and II.B.

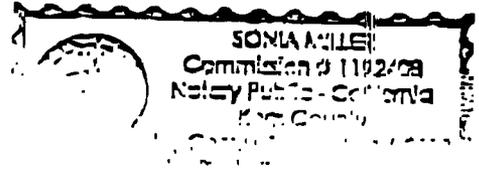
15. Delano Energy Company, Inc. responds as follows to Requests for Other Information No. III.A.: No.

16. Delano Energy Company, Inc. responds as follows to Requests for Other Information No. III.B.: No.


Doyle Hibler

SUBSCRIBED AND SWORN TO BEFORE
ME THIS 20 DAY OF MAY, 2002.


Notary Public



MORRISON & FOERSTER LLP

SAN FRANCISCO
LOS ANGELES
DENVER
PALO ALTO
WALNUT CREEK
SACRAMENTO
CENTURY CITY
ORANGE COUNTY
SAN DIEGO

ATTORNEYS AT LAW

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HONG KONG
SINGAPORE
TOKYO

May 31, 2002

Writer's Direct Contact
(202) 887-1506
RLoeffler@mofo.com

By Messenger

Donald J. Gelinas
Associate Director
Office of Markets, Tariffs and Rates
Federal Energy Regulatory Commission
888 First Street, N.E.
Washington, D.C. 20426

*Re: Fact-Finding Investigation of Potential Manipulation of Electric and
Natural Gas Prices, Docket No. PA02-2-000*

Dear Mr. Gelinas:

Enclosed please find the answers in the prescribed form of AES NewEnergy, Inc., AES Placerita, Inc., Delano Energy Company, Inc., Mountainview Power Company, and Riverside Canal Power Company (the "AES Companies") to the Data Requests of May 21, 2002, in the referenced docket.

Any questions with respect to this matter should be directed to the undersigned.

Respectfully submitted,



Robert H. Loeffler
Attorney for
The AES Companies

Enclosures

Fact-Finding Investigation of)
Potential Manipulation of Electric)
and Natural Gas Prices)

Docket No. PA02-2-000

AFFIDAVIT OF CLEM PALEVICH

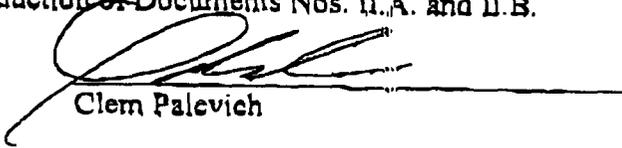
I, Clem Palevich, being duly sworn, hereby state under oath as follows:

1. I am the President of AES NewEnergy, Inc. I make this affidavit to the best of my knowledge, information, and belief formed after a thorough and diligent investigation under my supervision and control into the trading activities of AES NewEnergy, Inc. and its agents and employees, in the U.S. portion of the WSCC during the years 2000 and 2001.

2. AES NewEnergy, Inc. responds to the specific requests for admissions contained in the May 21, 2002 memorandum from Donald J. Gelinas (attached hereto), as follows:

- 3. Request No. I.A. Denied.
- 4. Request No. I.B.1. Not applicable.
- 5. Request No. I.B.2. Not applicable.
- 6. Request No. I.B.3. Not applicable.
- 7. Request No. I.B.4. Not applicable.
- 8. Request No. I.B.5. Not applicable.
- 9. Request No. I.B.6. Not applicable.

10. AES NewEnergy, Inc. has no documents in its possession, custody or control that are responsive to Requests for Production of Documents Nos. II.A. and II.B.


Clem Palevich

SUBSCRIBED AND SWORN TO BEFORE
ME THIS 30th DAY OF MAY, 2002.


Notary Public

(Please see attached)

CALIFORNIA ALL-PURPOSE ACKNOWLEDGMENT

State of California
County of Los Angeles

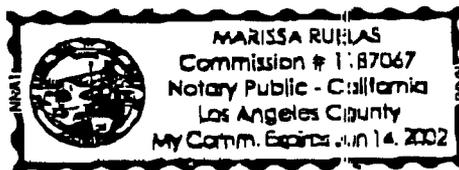
On May 30th, 2002, before me, Marissa Ruelas, Notary Public
DATE NAME, TITLE OF OFFICER - E.G., "JANE DOE, NOTARY PUBLIC"

personally appeared Clem Palevich
NAME OF SIGNER(S)
_____ personally known to me OR proved to me on the basis of satisfactory evidence

to be the person whose name is subscribed to the within instrument and acknowledged to me that he she they executed the same in his her their authorized capacity (ies), and that by his her their signature on the instrument the person , or the entity upon behalf of which the person acted, executed the instrument.

WITNESS my hand and official seal.

Marissa Ruelas
SIGNATURE OF NOTARY



OPTIONAL

~~Though the data below is not required by law, it may prove valuable to persons relying on the document and could prevent fraudulent reattachment of this form.~~

CAPACITY CLAIMED BY SIGNER	DESCRIPTION OF ATTACHED DOCUMENT
<input type="checkbox"/> INDIVIDUAL	<input type="checkbox"/> TITLE OR TYPE OF DOCUMENT
<input type="checkbox"/> CORPORATE OFFICER	<input type="checkbox"/> NUMBER OF PAGES
<input type="checkbox"/> PARTNER(S) <input type="checkbox"/> LIMITED <input type="checkbox"/> GENERAL	<input type="checkbox"/> DATE OF DOCUMENT
<input type="checkbox"/> ATTORNEY-IN-FACT	<input type="checkbox"/> SIGNER(S) OTHER THAN NAMED ABOVE
<input type="checkbox"/> TRUSTEE(S)	
<input type="checkbox"/> GUARDIAN/CONSERVATOR	
<input type="checkbox"/> OTHER: _____	
<input type="checkbox"/> _____	
<input type="checkbox"/> _____	
SIGNER IS REPRESENTING:	
<small>NAME OF PERSON(S) OR ENTITY(IES)</small>	

Fact-Finding Investigation of)
Potential Manipulation of Electric)
and Natural Gas Prices)

Docket No. PA02-2-000

AFFIDAVIT OF GEORGE HALL

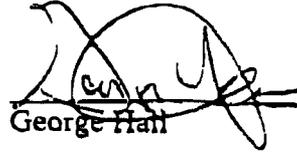
I, George Hall, being duly sworn, hereby state under oath as follows:

1. I am the Plant Manager of Mountainview Power Company. I make this affidavit to the best of my knowledge, information, and belief formed after a thorough and diligent investigation under my supervision and control into the trading activities of Mountainview Power Company and its agents and employees, in the U.S. portion of the WSCC during the years 2000 and 2001.

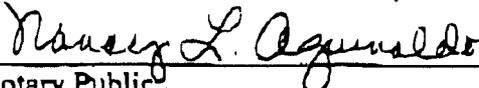
2. Mountainview Power Company responds to the specific requests for admissions contained in the May 21, 2002 memorandum from Donald J. Gellinas (attached hereto), as follows:

- | | | |
|----|--------------------|-----------------|
| 3. | Request No. I.A. | Denied. |
| 4. | Request No. I.B.1. | Not applicable. |
| 5. | Request No. I.B.2. | Not applicable. |
| 6. | Request No. I.B.3. | Not applicable. |
| 7. | Request No. I.B.4. | Not applicable. |
| 8. | Request No. I.B.5. | Not applicable. |
| 9. | Request No. I.B.6. | Not applicable. |

10. Mountainview Power Company has no documents in its possession,
custody or control that are responsive to Requests for Production of Documents Nos. II.A. and
II.B.


George Hall

SUBSCRIBED AND SWORN TO BEFORE
ME THIS 27th DAY OF MAY, 2002.


Nancy L. Aguinaldo
Notary Public



Fact-Finding Investigation of)
Potential Manipulation of Electric)
and Natural Gas Prices)

Docket No. PA02-2-00()

AFFIDAVIT OF GEORGE HALL

I, George Hall, being duly sworn, hereby state under oath as follows:

1. I am the Plant Manager of Riverside Canal Power Company. I make this affidavit to the best of my knowledge, information, and belief formed after a thorough and diligent investigation under my supervision and control into the trading activities of Riverside Canal Power Company and its agents and employees, in the U.S. portion of the WSCC during the years 2000 and 2001.

2. Riverside Canal Power Company responds to the specific requests for admissions contained in the May 21, 2002 memorandum from Donald J. Gelinas (attached hereto), as follows:

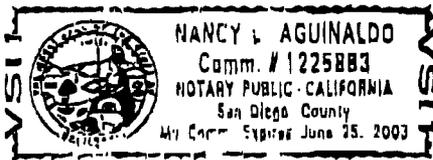
- 3. Request No. I.A. Denied.
- 4. Request No. I.B.1. Not applicable.
- 5. Request No. I.B.2. Not applicable.
- 6. Request No. I.B.3. Not applicable.
- 7. Request No. I.B.4. Not applicable.
- 8. Request No. I.B.5. Not applicable.
- 9. Request No. I.B.6. Not applicable.

10. Riverside Canal Power Company has no documents in its possession,
custody or control that are responsive to Requests for Production of Documents Nos. II.A. and
II.B.


George Hall

SUBSCRIBED AND SWORN TO BEFORE
ME THIS 27th DAY OF MAY, 2002.


Notary Public



Fact-Finding Investigation of)
Potential Manipulation of Electric)
and Natural Gas Prices)

Docket No. PA02-2-000

AFFIDAVIT OF DOYLE HIBLER

I, Doyle Hibler, being duly sworn, hereby state under oath as follows:

1. I am the Plant Manager of Delano Energy Company, Inc. I make this affidavit to the best of my knowledge, information, and belief formed after a thorough and diligent investigation under my supervision and control into the trading activities of Delano Energy Company, Inc. and its agents and employees, in the U.S. portion of the WSCC during the years 2000 and 2001.

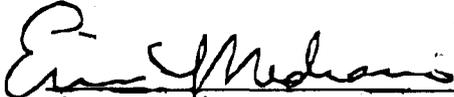
2. Delano Energy Company, Inc. responds to the specific requests for admissions contained in the May 21, 2002 memorandum from Donald J. Gelinas (attached hereto), as follows:

- 3. Request No. I.A. Denied.
- 4. Request No. I.B.1. Not applicable.
- 5. Request No. I.B.2. Not applicable.
- 6. Request No. I.B.3. Not applicable.
- 7. Request No. I.B.4. Not applicable.
- 8. Request No. I.B.5. Not applicable.
- 9. Request No. I.B.6. Not applicable.

10. Delano Energy Company, Inc. has no documents in its possession, custody or control that are responsive to Requests for Production of Documents Nos. I.A. and I.B.


Doyle Hibler

SUBSCRIBED AND SWORN TO BEFORE
ME THIS 29 DAY OF MAY, 2002.


Notary Public



Fact-Finding Investigation of)
Potential Manipulation of Electric)
and Natural Gas Prices)

Docket No. PA02-2-000

AFFIDAVIT OF JENNIFER LEHMANN

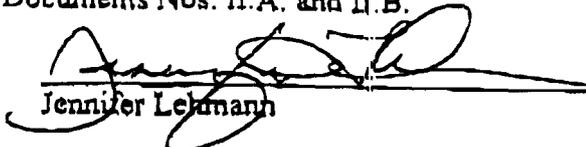
I, Jennifer Lehmann, being duly sworn, hereby state under oath as follows:

1. I am the Vice President of AES Placerita, Inc. I make this affidavit to the best of my knowledge, information, and belief formed after a thorough and diligent investigation under my supervision and control into the trading activities of AES Placerita, Inc. and its agents and employees, in the U.S. portion of the WSCC during the years 2000 and 2001.

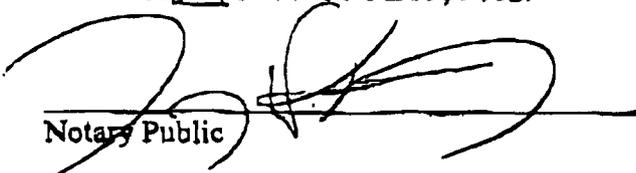
2. AES Placerita, Inc. responds to the specific requests for admissions contained in the May 21, 2002 memorandum from Donald J. Gelinis (attached hereto), as follows:

- | | | |
|----|--------------------|-----------------|
| 3. | Request No. I.A. | Denied. |
| 4. | Request No. I.B.1. | Not applicable. |
| 5. | Request No. I.B.2. | Not applicable. |
| 6. | Request No. I.B.3. | Not applicable. |
| 7. | Request No. I.B.4. | Not applicable. |
| 8. | Request No. I.B.5. | Not applicable. |
| 9. | Request No. I.B.6. | Not applicable. |

10. AES Placerita, Inc. has no documents in its possession, custody or control that are responsive to Requests for Production of Documents Nos. II.A. and II.B.


Jennifer Lehmann

SUBSCRIBED AND SWORN TO BEFORE
ME THIS 21 DAY OF MAY, 2002.


Notary Public

