

Thomas E Lauria  
State Bar No. 11998025  
WHITE & CASE LLP  
Wachovia Financial Center  
200 South Biscayne Blvd.  
Miami, FL 33131  
Telephone: (305) 371-2700  
Facsimile: (305) 358-5744

Robin Phelan  
State Bar No. 15903000  
Judith Elkin  
State Bar No. 06522200  
HAYNES AND BOONE, LLP  
901 Main Street  
Suite 3100  
Dallas, TX 75202  
Telephone: (214) 651-5000  
Facsimile: (214) 651-5940

PROPOSED ATTORNEYS FOR THE DEBTORS AND DEBTORS-IN-POSSESSION

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
FORT WORTH DIVISION**

_____ )	
In re )	Chapter 11 Case
MIRANT CORPORATION, <u>et al.</u> , )	Case No. 03-46590(DML)11
Debtors. )	Jointly Administered
_____ )	Hearing Date and Time: To Be Set

**MOTION OF THE DEBTORS FOR ORDER (1) AUTHORIZING THE DEBTORS (OR CLAIMS AGENT) TO SEND INITIAL NOTICES AND ALL OTHER MAILINGS DIRECTLY AND (2) AUTHORIZING THE DEBTORS TO FILE A CONSOLIDATED LIST OF (i) CREDITORS (WITHOUT CLAIM AMOUNTS) AND (ii) OTHER PARTIES IN INTEREST IN ACCORDANCE WITH EXHIBIT "G" TO THE GENERAL ORDER REGARDING PROCEDURES FOR COMPLEX CHAPTER 11 CASES**

**TO THE HONORABLE UNITED STATES BANKRUPTCY JUDGE:**

Mirant Corporation ("Mirant") and its affiliated debtors (collectively, the "Debtors"), as debtors-in-possession, file this motion (the "Motion") for entry of an order (1) authorizing the Debtors or their claims agent, Bankruptcy Services LLC (the "Claims Agent"),<sup>1</sup> to send initial notices and all other mailings directly, and (2) authorizing the Debtors to file a

<sup>1</sup> By separate motion, the Debtors have requested authority to retain Bankruptcy Services LLC as claims agent.

consolidated list of (i) creditors (without claim amounts) and (ii) other parties in interest that conforms with the flexible formatting guidelines set forth in Exhibit G to the General Order Regarding Procedures for Complex Chapter 11 Cases (the “Flexible Guidelines”), and respectfully represent as follows:

### **JURISDICTION AND VENUE**

1. This Court has jurisdiction to consider this matter pursuant to 28 U.S.C. §§ 157 and 1334. This is a core proceeding pursuant to 28 U.S.C. § 157(b). Venue is proper before this Court pursuant to 28 U.S.C. §§ 1408 and 1409.

### **PROCEDURAL BACKGROUND**

2. The Cases. On July 14, 2003 (the “Petition Date”), each of the Debtors filed a voluntary petition in this court for relief under chapter 11 of title 11 of the United States Code, 11 U.S.C. §§ 101-1330, as amended (the “Bankruptcy Code”). The Debtors continue to manage and operate their businesses as debtors-in-possession pursuant to sections 1107 and 1108 of the Bankruptcy Code.

3. Joint Administration Request is Pending. Concurrently with the filing of the Motion, the Debtors have moved the court to jointly administer the bankruptcy estates of the Debtors.

4. The Creditors’ Committee. No creditors’ committee has yet been appointed in these cases by the United States Trustee. Further, no trustee or examiner has been requested or appointed in any of the Debtors’ chapter 11 cases.

## **FACTUAL BACKGROUND**

5. Mirant and its direct and indirect subsidiaries comprise a competitive energy concern that generates and sells electricity in North America, the Philippines and the Caribbean. Through its direct and indirect subsidiaries, Mirant produces, sells and delivers reliable energy products and services to utilities, municipal systems, aggregators, electric-cooperative utilities, producers, generators, marketers and large industrial customers. Mirant's core business centers on the production and sale of electricity and electrical capacity (essentially the ability to produce electricity on demand). Mirant currently owns or controls more than 21,800 megawatts of electric generating capacity around the world, of which more than 18,000 megawatts is located in the United States. In 2002, Mirant produced 73 million megawatt-hours of electricity, sold 312 million megawatt-hours of electricity and sold or marketed an aggregate average of 21 billion cubic feet per day of natural gas.

6. Mirant employs in excess of 7,000 employees worldwide, of which approximately 1,100 employees are based at Mirant's corporate headquarters in Atlanta and approximately 5,900 employees are based at operating facilities. In 2002, Mirant recorded \$542 million loss in earnings before interest, taxes and depreciation ("EBITDA") on a consolidated basis. Its 2002 operating revenues were approximately \$6.4 billion.

7. A more detailed description of Mirant's assets, liabilities, and business operations, and a discussion of the events leading to the commencement of these chapter 11 cases is set forth in the Affidavit of John W. Ragan in Support of Certain First Day Motions.

## **RELIEF REQUESTED**

8. The Debtors hereby request authority to (i) mail directly to their creditors and other parties in interest a notice of the commencement of these cases and a notice of a meeting of creditors pursuant to section 341 of the Bankruptcy Code, as well as all other notices

to creditors and other parties in interest as directed by the Court, requested by the Office of the United States Trustee or as required by the Bankruptcy Code, the Bankruptcy Rules and the Local Rules and (ii) file a consolidated list of creditors (without claim amounts) and other parties in interest in conformance with the Flexible Guidelines.

**AUTHORIZATION FOR THE DEBTORS TO SEND INITIAL NOTICES  
AND ALL OTHER MAILINGS DIRECTLY IS WARRANTED**

9. The Debtors have identified thousands of entities and persons to which notice must be given. In cases of this size, courts often direct a debtor to complete such mailings to eliminate the undue burden on the Clerk's Office that would necessarily result from such a responsibility. Accordingly, the Debtors request authorization to undertake (or have their authorized claims agent undertake) the mailing of a notice of the filing of these cases and a notice of a meeting of creditors pursuant to section 341 of the Bankruptcy Code, as well as all other notices to creditors and other parties in interest as directed by the Court or requested by the United States Trustee, or as required by the Bankruptcy Code, the Bankruptcy Rules and the Local Rules.

**AUTHORIZATION FOR THE DEBTORS TO FILE A CONSOLIDATED  
LIST OF CREDITORS (WITHOUT CLAIM AMOUNTS)  
THAT CONFORMS WITH THE FLEXIBLE GUIDELINES**

10. As set forth above, the Debtors have identified thousands of entities and persons to which notice must be given. The Debtors maintain lists of names and addresses of all such entities and persons on various computer programs that will permit the Debtors to print consolidated creditor lists and mailing lists.

11. Transferring this information on an individual debtor basis to the form of a mailing label matrix of the type required by the Clerk's office would be a monumental, time consuming and expensive task. In addition, the risk of error in transcription would be

significant. Moreover, in light of the size of the mailing, the Court is likely to direct the Debtors (and not the Clerk of the court) to send out mailings. Consequently, the Debtors believe it is in the best interests of the Debtors' estates and their creditors to avoid the costs and risk associated with the preparing and filing the mailing matrix on an individual debtor basis.

12. Accordingly, the Debtors request that the Court authorize the filing of a consolidated list of (i) creditors (without claim amounts) and (ii) other parties in interest, including equity security holders, in conformance with the Flexible Guidelines.

### **NOTICE**

13. Notice of the Motion has been provided to the Office of the United States Trustee for the Northern District of Texas; the holders of the fifty largest unsecured claims against the Debtors on a consolidated basis; and certain governmental entities, counsel and parties-in-interest; all as set forth in more detail on the Certificate of Service attached hereto. The Debtors submit that no other or further notice need be provided

### **CONCLUSION**

WHEREFORE, the Debtors respectfully request entry of an order (1) authorizing the Debtors or their claims agent, Bankruptcy Services LLC to send initial notices and all other mailings directly, (2) authorizing the Debtors to file a consolidated list of (i) creditors (without claim amounts) and (ii) other parties in interest that conforms with the flexible formatting guidelines set forth in Exhibit G to the Flexible Guidelines, and (3) granting such other and further relief as is just and proper.

Dated: Fort Worth, Texas  
July 15, 2003

HAYNES AND BOONE, LLP  
901 Main Street  
Suite 3100  
Dallas, TX 75202  
(214) 651-5000

By s/ Robin Phelan

Robin Phelan  
State Bar No. 15903000  
Judith Elkin  
State Bar No. 06522200  
Ian Peck  
State Bar No. 24013306

-and-

Thomas E Lauria  
State Bar No. 11998025  
Gerard Uzzi  
Linda M. Leali  
WHITE & CASE LLP  
Wachovia Financial Center  
200 South Biscayne Blvd.  
Miami, Florida 33131  
(305) 371-2700

PROPOSED ATTORNEYS FOR THE DEBTORS  
AND DEBTORS-IN-POSSESSION

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
FORT WORTH DIVISION**

In re	)	Chapter 11 Case
MIRANT CORPORATION, <u>et al.</u> ,	)	Case No. 03-46590(DML)11
Debtors.	)	Jointly Administered

**ORDER (1) AUTHORIZING THE DEBTORS (OR CLAIMS AGENT) TO  
SEND INITIAL NOTICES AND ALL OTHER MAILINGS DIRECTLY  
AND (2) AUTHORIZING THE DEBTORS TO FILE A CONSOLIDATED LIST OF (i)  
CREDITORS (WITHOUT CLAIM AMOUNTS) AND (ii) OTHER PARTIES IN  
INTEREST IN ACCORDANCE WITH EXHIBIT "G" TO THE GENERAL ORDER  
REGARDING PROCEDURES FOR COMPLEX CHAPTER 11 CASES**

Upon the Motion, dated July 15, 2003, (the "Motion") of Mirant Corporation and its affiliated debtors (collectively, the "Debtors"), as debtors-in-possession, for an order (1) authorizing the Debtors, or their claims agent, Bankruptcy Services LLC, to send initial notices and all other mailings to their creditors, interest holders and other interested parties directly, and (2) authorizing the Debtors to file a consolidated list of (i) creditors (without claim amounts) and

(ii) other parties in interest in accordance with Exhibit "G" to the General Order Regarding Procedures for Complex Chapter 11 Cases (the "Flexible Guidelines"), all as more fully set forth in the Motion; and the Court having jurisdiction to consider the Motion and the relief requested therein in accordance with 28 U.S.C. §§ 157 and 1334; and it appearing that the relief sought in the Motion is in the best interests of the Debtors, their respective estates, and creditors; and due notice of the Motion having been provided as set forth in the Motion and it appearing that no other or further notice need be provided; and sufficient cause appearing therefore, it is

**ORDERED** that, the Debtors, or their duly appointed claims agent, are authorized to send initial notices and all mailings to creditors and other parties in interest as directed by the Court, requested by the Office of the United States Trustee or as required by the Bankruptcy Code, the Federal Rules of Bankruptcy Procedure and the Local Rules, and to incur all costs relating thereto; and it is further

**ORDERED** that, the Debtors are authorized to file a consolidated list of (i) creditors (without claim amounts) and (ii) other parties in interest in conformance with the Flexible Guidelines.

### End of Order ###

**PREPARED BY:**

Robin Phelan  
State Bar No. 15903000  
Judith Elkin  
State Bar No. 06522200  
Ian Peck  
State Bar No. 24013306  
HAYNES AND BOONE, LLP  
901 Main Street  
Suite 3100  
Dallas, TX 75202  
(214) 651-5000

-and-

Thomas E Lauria  
State Bar No. 11998025  
Gerard Uzzi  
Linda M. Leali  
WHITE & CASE LLP  
Wachovia Financial Center  
200 South Biscayne Blvd.  
Miami, Florida 33131  
(305) 371-2700

**PROPOSED ATTORNEYS FOR THE DEBTORS  
AND DEBTORS-IN-POSSESSION**

## CERTIFICATE OF SERVICE

The undersigned hereby certifies that she provided true and correct copies of the forgoing to Bankruptcy Services, LLC and directed them to effect service upon all persons on the attached Service List via Facsimile or email transmission, where indicated, or via overnight courier, on the 15<sup>th</sup> day of July, 2003.

s/ Judith Elkin

## Service List

Environmental Protection Agency  
EPA East  
1201 Constitution Avenue, N.W.  
Room number 4101 M  
Washington, DC 20004  
eMail:  
Fax:

United States Attorney  
Office of the United States Attorney  
3rd Floor, 1100 Commerce Street  
Dallas, Texas 75242  
eMail:  
Fax:

Attorney General  
Office of the Attorney General  
714 Jackson Street  
6th Floor  
Dallas, Texas 75202  
eMail:  
Fax:

Office of Attorney General  
Main Justice Building  
Room 5111  
10th & Construction Avenue, N.W.  
Washington, D.C. 20530  
eMail:  
Fax:

Internal Revenue Service  
Special Procedures Staff  
Internal Revenue Service  
Mail Code 5020-DAL  
1100 Commerce Street Room 9B8  
Dallas, Texas 75242  
eMail:  
Fax:

Credit Suisse First Boston  
C/o Issuer Services  
ADP Proxy Services  
51 Mercedes Way  
Edgewood, NY 11717  
eMail:  
Fax: (631) 254-7618

Neuberger Berman LLC  
605 Third Avenue  
New York, NY 10158  
eMail:  
Fax:

Texas Workforce Commission  
TEC Building Bankruptcy  
101 East 15th Street  
Austin, Texas 78778  
eMail:  
Fax:

Neuberger Berman LLC  
C/o Issuer Services  
ADP Proxy Services  
51 Mercedes Way  
Edgewood, NY 11717  
eMail:  
Fax: (516) 254-7618

Environmental Protection Agency  
Fountain Place 12th Floor  
Suite 1200  
1445 Ross Avenue  
Dallas, TX 75202-2733  
eMail:  
Fax:

Environmental Protection Agency  
Atlanta Federal Center  
61 Forsyth Street, SW  
Atlanta, GA 30303-3104  
eMail:  
Fax:

Georgia Department of Labor  
148 Andrew Young International Blvd  
Atlanta, GA 30303-1751  
eMail:  
Fax:

Attorney General of Georgia  
40 Capitol Square, SW  
Atlanta, GA 30303  
eMail:  
Fax:

Wells Fargo Bank Minnesota NA  
1600 East Madison Avenue  
Mankato, MN 56001  
eMail:  
Fax:

Wells Fargo Bank Minnesota NA  
C/o Issuer Services  
ADP Proxy Services  
51 Mercedes Way  
Edgewood, NY 11717  
eMail:  
Fax:

Comptroller of Public Accounts  
State Comptroller of Public Accounts  
Section  
P.O. Box 13528  
Austin, Texas 78711  
eMail:  
Fax:

Benjamin C. Ackerty  
Hunton & Williams  
Riverfront Plaza  
East Tower  
951 East Byrd Street  
Richmond, VA 23219  
eMail: [backerty@hunton.com](mailto:backerty@hunton.com)  
Fax: (804) 788-8218

Jill Akre  
Wachovia Securities  
1339 Chestnut Street  
3rd Floor  
Philadelphia, PA 19107  
eMail:  
Fax:

Daniel Allen  
Morgan Stanley Senior Funding Inc.  
1633 Broadway  
25th Floor  
New York, NY 10019  
eMail:  
Fax:

Samuel Asiedu  
Export Development Corporation  
151 O'Connor  
Ottawa, Canada K1A 1K3  
eMail: Sasiedu@edc.ca  
Fax: (613) 598-3186

Andrea Augustina  
Deutsche Bank Securities Inc.  
1251 Avenue of the Americas  
New York, NY 10020  
eMail:  
Fax: (212) 463-3326

Patricia Baldwin  
Goldman, Sachs & Co.  
1 New York Plaza  
45th Floor  
New York, NY 10004  
eMail:  
Fax: (212) 902-1431

Kenneth J. Bauer  
Bank One NA  
One Bank One Plaza  
8th Floor  
Chicago, IL 60607  
eMail:  
Fax: (312) 732-3055

David Bennett  
Thompson & Knight, LLP  
1700 Pacific Avenue  
Suite 3300  
Dallas, TX 75201-4693  
eMail:  
Fax: (214) 969-1751

Jacqueline Brunetto  
KBC Bank N.V.  
245 Peachtree Center Avenue  
Suite 2550  
Atlanta, GA 30303  
eMail: jacqueline.brunetto@kbc.be  
Fax: (404) 584-5466

John Byrne  
Lehman Brothers Inc.  
70 Hudson Street  
Jersey City, NJ 07302  
eMail:  
Fax: (212) 548-9262

Joseph J. Callahan  
State Street Bank and Trust Compan  
1776 Heritage Drive  
Global Corporation Action Unit  
Quincy, MA 02171  
eMail:  
Fax: (617) 537-5004

James S. Carr  
Kelley Drye & Warren LLP  
101 Park Avenue  
New York, NY 10078  
eMail: jcarr@kelleydrye.com  
Fax: (212) 808-7897

Romalo Catalano  
Merrill Lynch Professional Clearing C  
101 Hudson Street  
Jersey City, NJ 07302  
eMail:  
Fax: (201) 557-1876

Mark B. Cohen  
Deutsche Bank AG  
60 Wall Street  
New York, NY 10019  
eMail: mark.b.cohen@db.com  
Fax: (212) 797-5695

Joseph P. Collins  
Mayer, Brown & Platt  
190 South LaSalle Street  
Chicago, IL 60603  
eMail: jcollins@mayerbrownrowe.cc  
Fax: (312) 706-9101

Paula Dabner  
JP Morgan Chase  
14201 Dallas Parkway  
Dallas, TX 75254  
eMail:  
Fax: (469) 477-2183

Yoram Dankner  
HypoVereinsbank  
150 East 42nd Street  
New York, NY 10017-4679  
eMail: yoram.dankner@hvbamerica  
Fax: (212) 672-5530

Billy D. Dixon  
BP America, Inc.  
501 Westlake Park Blvd.  
Houston, TX 77079  
eMail: billy.dixon@bp.com  
Fax: (281) 366-7583

Angela D Dodd  
Securities and Exchange Commissio  
Midwest Regional Office  
175 W. Jackson Blvd, Ste 900  
Chicago, IL 60604  
eMail: dodda@sec.gov  
Fax: (312) 353-7398

Ken Donohue  
JP Morgan Securities Inc.  
34 Exchange Place  
Jersey City, NJ 07302  
eMail:  
Fax: (201) 324-1691

John Dorans  
Citigroup/Salomon Smith Barney  
250 West Street, 8th Floor  
New York, NY 10013  
eMail: john.dorans@citigroup.com  
Fax: (212) 723-3899

Fernando Ferreyea  
Dexia Credit Local  
445 Park Avenue  
8th Floor  
New York, NY 10022  
eMail:  
Fax:

Keith Frohlicher  
US Bank National Association  
1555 Rivercenter Drive  
Suite 0300  
Milwaukee, WI 53212  
eMail:  
Fax: (414) 905-5581

Marvin J. Goldstein  
Stroock & Stroock & Lavan, LLP  
180 Maiden Lane  
New York, NY 10038-4982  
eMail: mgoldstein@stroock.com  
Fax: (212) 806-6006

Deborah Gravinese  
TD Securities (USA) Inc.  
31 West 52nd Street  
New York, NY 10019-6101  
eMail: deborah.gravinese@tdsecuri  
Fax: (212) 827-7244

Karen Greene  
The Northern Trust Company  
801 Canal C-In  
Chicago, IL 60607  
eMail:  
Fax: (312) 444-3882

Charles Greer  
The Royal Bank of Scotland plc  
101 Park Avenue  
New York, NY 10178  
eMail: charles.greer@rbos.com  
Fax: (212) 401-3759

Cynthia Grimm  
Bank of America Securities LLC  
100 North Tryon  
Charlotte, NC 28255-0001  
eMail: Cindy.grimm@bankofamerica  
Fax: (704) 386-1319

Seth Grosshandler  
Cleary Gottlieb Steen & Hamilton  
One Liberty Plaza  
New York, NY 10006  
eMail: sgrosshandler@cgsh.com  
Fax: (212) 225-3999

Scott Habura  
Deutsche Bank Securities Inc.  
1251 Avenue of the Americas  
New York, NY 10020  
eMail:  
Fax: (212) 618-3722

Pat Haller  
Citigroup Global Markets Inc.  
333 West 34th Street  
New York, NY 10001  
eMail:  
Fax: (212) 615-9053

Larry Hammond  
Barclays Capital  
222 Broadway  
New York, NY 10038  
eMail:  
Fax: (212) 412-3350

Edward Hamway  
Barclays Bank plc  
200 Park Avenue  
4th Floor  
New York, NY 10166  
eMail:  
Fax:

Amelia Henson  
The Northern Trust Company  
801 Canal C-In  
Chicago, IL 60607  
eMail:  
Fax: (312) 444-3882

Al Hernandez  
Pershing Securities Corporation  
1 Pershing Plaza  
Jersey City, NJ 07399  
eMail:  
Fax: (201) 413-5263

Trevor Houston  
Citigroup/Salomon Smith Barney  
250 West Street, 8th Floor  
New York, NY 10013  
eMail: trevor.houston@citigroup.com  
Fax: (212) 723-3964

Stefan Huber  
Landesbank Rheinland-Phalz  
Grosse Bleiche 54-56  
Mainz  
Germany D-55098  
eMail:  
Fax:

Walter Hulse  
UBS Warburg  
299 Park Avenue  
New York, NY 10171  
eMail: walter.hulse@ubsw.com  
Fax: (212) 821-2287

Anthony Ianno  
JP Morgan Chase  
277 Park Avenue  
New York, NY 10072  
eMail: anthony.ianno@chase.com  
Fax: (646) 534-1355

Yasuo Imaizumi  
Mizuho Corporate Bank  
1251 Avenue of the Americas  
New York, NY 10020  
eMail:  
Fax: (212) 282-4250

David Kalal  
UBS Warburg  
Impaired Loan Management  
Stamford Branch  
677 Washington Boulevard  
Stamford, CT 06901  
eMail:  
Fax: (203) 719-3162

Paul Kehoe  
Dresdner Kleinwort Wasserstein  
1301 Avenue of the Americas  
New York, NY 10029-6163  
eMail: paul.kehoe@drkw.com  
Fax: (212) 969-2710

Gauri Ketcher  
The Royal Bank of Scotland plc  
101 Park Avenue  
New York, NY 10178  
eMail: gauri.ketcher@rbos.com  
Fax: (212) 401-3759

Chris Kinney  
Barclays Bank plc  
200 Park Avenue  
4th Floor  
New York, NY 10166  
eMail: christopher.kinney@barcap.c  
Fax:

Dennis Klejna  
Refco Group Ltd., LLC  
One World Financial Center  
200 Liberty Street, Tower A  
New York, NY 10281-1094  
eMail: dklejna@refco.com  
Fax: (212) 693-7332

Felicia LaForgia  
Westdeutsche Landesbank Girozent  
1211 Avenue of the Americas  
New York, NY 10036  
eMail: felicia\_laforgia@westlb.com  
Fax: (212) 652-5971

Cecile Lamarco  
The Bank of New York  
One Wall Street  
New York, NY 10286  
eMail: clamarco@bankofny.com  
Fax:

John Lasher  
Deutsche Bank Trust Company Amei  
648 Grassmere Park Road  
Nashville, TN 37211  
eMail:  
Fax: (615) 835-3409

Carlos Lede  
UBS Securities LLC  
677 Washington Boulevard  
Stamford, CT 06901  
eMail:  
Fax: (203) 719-0795

David A. Leslie  
Citibank, N.A.  
3800 Citibank Center, B3-15  
Tampa, FL 33610  
eMail: David.Leslie@citigroup.com  
Fax: (813) 604-1155

John Mancuso  
Bank of New York/UBS AG Designed  
One Wall Street  
14th Floor  
New York, NY 10286  
eMail:  
Fax:

Vincent Marzella  
Bear Stearns Securities Corp.  
One Metrotech Center North  
4th Floor  
Brooklyn, NY 11201-3862  
eMail:  
Fax: (347) 643-4625

Michael P. Massad, Jr.  
Hunton & Williams  
Energy Plaza, 30/F  
1601 Bryan Street  
Dallas, Texas 75201-3402  
eMail: mmassad@hunton.com  
Fax: (214) 880-0011

James Masters  
Mizuho Corporate Bank  
191 Peachtree Street, NE  
Suite 3825  
Atlanta, GA 30303  
eMail:  
Fax:

William McCoy  
Morgan Stanley  
1221 Avenue of the Americas  
New York, NY 10020  
eMail: william.mccoy@morganstanl  
Fax: (212) 762-8896

George F. McElreath  
United States Trustee's Office  
Earle Cabell Federal Building  
1100 Commerce Street  
Room 9C60  
Dallas, TX 75242  
eMail: george.f.mcelreath@usdoj.gr  
Fax: (214) 767-8971

Michael McKenney  
Bank of America Securities LLC  
100 North Tryon  
Charlotte, NC 28255-0001  
eMail: michael.j.mckenney@bankof  
Fax:

Lisa J. Mellencamp  
Duke Energy Trading and Marketing,  
5400 Westheimer Court  
Houston, Texas 77056  
eMail: lljmellencamp@duke-energy.  
Fax: (713) 627-6134

Charles O'Neil  
ING Bank NV  
1325 Avenue of the Americas  
New York, NY 10019  
eMail:  
Fax: (646) 424-6440

Sean O'Sullivan  
Bayerische Landesbank Girozentrale  
560 Lexington Avenue  
17th Floor  
New York, NY 10022  
eMail: sosullivan@baylbny.com  
Fax: (212) 310-9868

Peggy Peckham  
Fleet National Bank  
Fleet National Bank  
100 Federal Street  
12th Floor  
Boston, MA 02110  
eMail: peggy\_a\_peckham@fleet.co  
Fax: (617) 434-3652

William Procasky  
DZ Bank AG  
609 Fifth Avenue  
New York, NY 10017  
eMail: william.procasky@dzbank.de  
Fax: (212) 745-1422

Noel Purcell  
Mizuho Corporate Bank  
1251 Avenue of the Americas  
New York, NY 10020  
eMail:  
Fax: (212) 282-4490

Caperton Putt  
Wachovia Securities  
GA9174, 999 Peachtree Street  
Atlanta, GA 30309  
eMail:  
Fax:

Brian Regan  
New York Mercantile Exchange, Inc.  
World Financial Center  
One North End Avenue  
New York, NY 10282  
eMail: bregan@nymex.com  
Fax: (212) 229-2298

Victor Reich  
Morgan Stanley & Co. Inc  
One Pierrepoint Plaza  
Brooklyn, NY 11201  
eMail: victor.reich@morganstanley.i  
Fax: (718) 754-4291

Scott Reifer  
Bank of America Securities LLC  
300 Harman Meadow Boulevard  
Secaucus, NJ 07094  
eMail: scott.reifer@bankofamerica.c  
Fax: (415) 835-2581

Monique Renta  
Credit Suisse First Boston  
11 Madison Avenue  
New York, NY 10010-3629  
eMail: monique.renta@csfb.com  
Fax: (917) 326-8189

Bill Rhodes  
Bank of Tokyo-Mitsubishi Trust Co.  
1251 Avenue of the Americas  
New York, NY 10020-1104  
eMail: brhodes@btmna.com  
Fax: (212) 782-6400

Magalie R. Salas  
Federal Energy Regulatory Commiss  
888 First Street, N.E.  
Washington, D.C. 20426  
eMail:  
Fax:

Frank Sandler  
Bank of Nova Scotia  
One Liberty Plaza  
26th Floor  
New York, NY 10006  
eMail: frank.sandler@scotiacapital.c  
Fax: (212) 225-5172

David Sawyer  
Credit Suisse First Boston  
11 Madison Avenue  
New York, NY 10010-3629  
eMail: david.sawyer@csfb.com  
Fax: (212) 743-2659

Sanjeeva Senananyake  
CIBC World Markets Corp.  
425 Lexington Avenue  
17th Floor  
New York, NY 10022  
eMail: sanjeeva.senananyake@us.c  
Fax:

Carl Shafer  
Bank One NA  
1717 Main Street  
4th Floor  
Dallas, TX 75201  
eMail:  
Fax:

Alan Sidrane  
Credit Lyonnais New York Branch  
1301 Avenue of the Americas  
New York, New York 10019  
eMail: alan.sidrane@clamericas.cor  
Fax: (212) 261-3259

Didier Siffer  
Credit Suisse First Boston  
11 Madison Avenue  
New York, NY 10010-3629  
eMail: didier.siffer@csfb.com  
Fax: (212) 325-0304

Paul Silverstein  
Andrews & Kurth L.L.P.  
Andrews & Kurth L.L.P.  
805 Third Avenue  
New York, NY 10022  
eMail: psilverstein@akllp.com  
Fax: (212) 850-2929

Gen Simms  
Wachovia Securities  
Class Action and Bankruptcy  
111 8th Avenue  
New York, NY 10011  
eMail:  
Fax: (212) 776-8161

Fredric Sosnick  
Shearman & Sterling  
599 Lexington Avenue  
New York, NY 10022-6069  
eMail: fsosnick@shearman.com  
Fax: (212) 848-7179

Mark A. Speiser  
Stroock & Stroock & Lavan, LLP  
180 Maiden Lane  
New York, NY 10038-4982  
eMail: mspeiser@stroock.com  
Fax: (212) 806-6006

Darrell Stanley  
Credit Lyonnais Americas  
1301 Travis Street  
Suite 2100  
Houston, TX 77002  
eMail:  
Fax: (713) 890-8668

Melissa Tarasovich  
Boston Safe Deposit & Trust Co.  
525 William Penn Place  
Pittsburgh, PA 15259  
eMail:  
Fax: (412) 234-7244

Fred C. Thurston  
Dresdner Bank, A.G.  
75 Wall Street  
25th Floor  
New York, NY 10005-2889  
eMail:  
Fax:

Anica Trifan  
Deutsche Bank AG  
60 Wall Street  
New York, NY 10019  
eMail: anca.trifan@db.com  
Fax: (212) 797-5695

Frank Turner  
Lehman Brothers, Inc.  
745 Seventh Avenue  
3rd Floor  
New York, NY 10019  
eMail: fturner@lehman.com  
Fax: (646) 758-1986

Bert Valdman  
JP Morgan Chase  
277 Park Avenue  
New York, NY 10072  
eMail: Bertrand.Valdman@JPMorg  
Fax: (646) 534-1355

Subash Viswanathan  
CommerzBank AG  
2 World Financial Center  
225 Liberty Street  
New York, NY 10281-1060  
eMail: sviswanathan@cbkna.com  
Fax: (404) 888-6539

John R. Weiss  
Katten Muchin Zavis Rosenman  
525 West Monroe Street  
Suite 1600  
Chicago, Illinois 60661-3693  
eMail: John.Weiss@kmzr.com  
Fax: (312) 577-4733

Steve A. Youngman  
Weil, Gotshal & Manges, LLP  
100 Crescent Court  
Suite 1300  
Dallas, Texas 75201-6950  
eMail: stephen.youngman@weil.cor  
Fax:

Ron Zeller  
TD Securities (USA) Inc.  
31 West 52nd Street  
New York, NY 10019-6101  
eMail: robyn.zeller@tdsecurities.cor  
Fax: (212) 827-7284

Bruce R. Zirinsky  
Cadwalder, Wickersham & Taft  
100 Maiden Lane  
New York, New York 10038  
eMail: bruce.zirinsky@cwt.com  
Fax: (212) 504-6666