



September 10, 2004

Mr. James Cargas  
Deputy Director  
NAESB  
1301 Fannin, Suite 2350  
Houston, TX 77002

**Re: Draft Request for Standards on Energy Market Product Definitions**

Dear Mr. Cargas:

Mirant recommends that the Seams Subcommittee consider drafting the request as a regional standard. An attempt was made to address this issue as part of the Electric Trading Task Force back in early 2003 and it quickly became clear that the interconnections view these terms differently. Mirant suggests that it may not be the best use of scarce resources to tackle this issue as a national business practice at this time.

Note also that the proposed terms don't align with the EEI Master Purchase & Sale Agreement, which is widely used in the Eastern Interconnection. Therefore if the proposed terms were adopted as a national business practice, the EEI master agreement would need to be amended. This is another effort that NAESB has recently embarked upon that did not reap positive benefit. Again, to embark down this path may not be the best use of scarce resources.

Thank you for the opportunity to comment.

Sincerely,

A handwritten signature in black ink, appearing to read "Alan Johnson", written in a cursive style.

Alan Johnson  
Manager Business & Reliability Standards