III. RESOURCE MATERIALS PREPARED BY JOINT COMMITTEE ON TAXATION STAFF

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Individuals Interviewed by Joint Committee Staff During Investigation*

Name	Position**	Date of Interview
Armsworth, Sheila DeVore	Vice President, Human Resources, Enron North America until December 2001	November 7, 2002 (telephone)
Apke, Beth A.	Senior Director, Enron Energy Services	August 6, 2002 (Houston)
Bazelides, Phillip J.	Vice President, Human Resources, Azurix until March 2001	September 24, 2002 (Houston)
Bell, Joyce Ann	Director of Compensation & Benefits, PGE	September 6, 2002 (telephone)
Butcher, Sharon Angel	Assistant General Counsel, Enron	August 6, 2002 (Houston)
Butler, Pam	Senior Director of Compensation, Enron	August 6, 2002 (Houston); November 11, 2002 (telephone)
Carter, Rebecca	Senior Vice President for Board Communications & Corporate Secretary until August 2001	September 10, 2002 (Houston)
Coats, Edward Raymond	Vice President, Tax Department	August 7, 2002 (Houston)
Courtney, John Calvin	Attorney for Administrative Committee of the qualified plans	November 6, 2002 (telephone)
Douglas, Stephen Holme	Director of Taxes, Enron North America until February 2002	September 23, 2002 (Houston)
Duke, Cullen Andrew	Vice President, International Tax	August 8, 2002 (Houston)
Duncan, John House	Board of Directors, until March 2002; Executive & Compensation Committees, Enron until March 2002	October 25, 2002 (telephone)
Ginty, James Andrew	Vice President, Tax Planning Group	August 8, 2002 (Houston)
Goodrow, Alicia Lynn Lockheed	Senior Director, Tax Planning Group	September 23, 2002 (Houston)
Gulyassy, William	Vice President, Enron Energy Services until July 2001	November 7, 2002 (telephone)

Name	Position**	Date of Interview
Harris, James W.	Vice President, Enron Energy Services until December 2001	August 8, 2002 (Houston)
Hayslett, Roderick J.	Chief Financial Officer, Enron Transportation Services	August 7, 2002 (Houston)
Hermann, Robert J.	Managing Director and General Tax Counsel, Tax Department, Enron until May 2002	July16, 2002 (DC); December 12, 2002 (telephone)
Hogan, Janice	Secretary, Enron	August 5, 2002 (Houston)
Hosea, Robin D.	Senior Benefits Specialist until May 2001	September 20, 2002 (telephone)
Jones, Robert W.	Managing Director, Human Resources	August 6, 2002 (Houston)
Joyce, Mary Frances Elizabeth	Vice President until June 2002	September 9, 2002 (Houston); November 20, 2002 (telephone)
LaMaistre, Charles Aubrey	Board of Directors; Chair, Compensation Committee, Enron until March 2002	September 24, 2002 (Houston)
Lay, Kenneth L.	Chairman of the Board and Chief Executive Officer until January 2002	Did not submit to interview but counsel Piper Rudnic submitted written response to questions
Lindsey, Mark	Vice President, Corporate Accounting and Planning, Enron	January 23, 2003 (telephone)
Livingston, Tina	Senior Director, Tax Department, Enron until February 2001	November 12, 2002 (telephone)
Mackin, Frank D. Jr. ("Pat")	Attorney - Enron Outside ERISA Counsel	November 8, 2002 (telephone)
Maxey, Robert Davis	Vice President, Tax Planning until January 2002	August 6, 2002 (Houston); September 24, 2002 (Houston)
Mintz, Jordan Howard	Managing Director, Tax Department until 2003	September 24, 2002 (Houston)
Newgard, James R.	Manager, Finance & Treasury Groups	August 8, 2002 (Houston)
Olson, Cynthia Kay	Executive Vice President, Human Resources until July 2002	August 7, 2002 (Houston)

Name	Position**	Date of Interview
Prentice, James S.	Senior Vice President, EOTT, transferred to Enron 2002; current title unknown	September 20, 2002 (telephone)
Rahaim, Christian D.	Senior Director of Benefits, Enron	August 5, 2002 (Houston)
Rath, Mikie	Benefits Manager, Enron until March 2002	August 8, 2002 (Houston)
Rice, Greek Lent	General Manager, Tax Department	September 23, 2002 (Houston)
Sandt, James M.	Tax Compliance, Enron	October 15, 2002 (telephone)
Savage, Frank	Board of Directors, served on Compensation and Finance Committees until April 2002	November 14, 2002 (telephone)
Sayers, Rod	Director, Tax Department, Enron until February 2002	November 15, 2002 (telephone)
Skilling, Jeffrey K.	Chief Executive Officer, Enron until August 2001	November 13, 2002 (DC)
Tiller, Ann Marie	Senior Director until July 2001	December 20, 2002 (telephone)
Whalley, Lawrence Gregory	President, Enron Corp. until February 2002	September 9, 2002 (Houston)
White, Leesa M.	Senior Director, Tax Administration, Enron	August 7, 2002 (Houston)
Williams, David Clair	Senior Director, Head of Structured Transactions Group	September 23, 2002 (Houston)

*The Joint Committee staff was unable to interview the following individuals despite repeated attempts: Cynthia Barrow, Rick Buy, Ben Glisan, and Richard Causey.

**Position for Enron employees generally is last known position held. Some of the individuals who are listed as Enron employees as of the date of the Joint Committee staff interview may subsequently have left the company. In addition, employees may have changed positions in the company since the time of the Joint Committee staff interview.

Glossary of Terms Relevant to the Joint Committee on Taxation Staff Investigation

ACES: automatic common exchange securities, a financial instrument marketed by Goldman Sachs & Co.

ACTS: adjustable-rate trust securities

Administrative Committee: refers collectively to the Administrative Committees established under the Enron Corp. Retirement Plan/Cash Balance Plan, the Enron Corp. ESOP, and the Enron Corp. Savings Plan

AEP: American Electric Power

Akin Gump: Akin Gump Strauss Hauer & Feld, L.L.P., a Dallas/Washington, DC based international law firm

Annual Incentive Plan: Enron Corp. Annual Incentive Plan

Apache: financing arrangement in which Enron borrowed funds from third-party foreign lenders, through an Enron controlled foreign corporation

APB: Accounting Principles Board

Arthur Andersen: Arthur Andersen LLP, a U.S. based international accounting firm and Enron's auditor

Avici: Avici Systems Inc.

Azurix: Azurix Corp., an Enron affiliate involved in Enron's water business after Enron's 1998 acquisition of Wessex Water Plc

Bammel Assets: underground natural gas storage reservoir and various assets that were the subject of Condor

Bankers Trust: Bankers Trust Company, a New York banking corporation, acquired by Deutsche Bank in 1999

Bankruptcy Court: in the case of Enron's voluntary bankruptcy petition, the United States Bankruptcy Court, Southern District of New York

Barclays or Barclays Bank: Barclays Bank PLC, an international banking firm

Big River: Big River Funding LLC

Blue Heron: Blue Heron I, LLC

Board or Board of Directors: Board of Directors of Enron Corp.

Glossary of Terms Relevant to the Joint Committee on Taxation Staff Investigation, continued

Bobcat: Bobcat I, LLC, a special purpose entity utilized in Raptor IV

BT Ever: BT Ever, Inc., affiliate of Bankers Trust

BT Green: BT Green, Inc., affiliate of Bankers Trust

CalPERS: California Public Employees Retirement System

Campsie: Campsie Limited

Cayman LLC: a Cayman Islands limited life company

Cayman Parent: a Cayman Islands holding company

Cayman Sub: a Cayman Islands subsidiary company

Cayman Triangle: tax planning structure involving the use of three Cayman Islands entities

CCA: chief counsel advice issued by the IRS

CFC: controlled foreign corporation governed by sections 951 through 964 of the Code

Chairman or Chairman of the Board: the Chairman of Enron's Board of Directors

Chase Manhattan Bank: bank that merged with JP Morgan & Co., Inc. to become JP Morgan Chase & Co.

Check the box regulations: Treasury Department regulations pursuant to which certain legal entities are eligible to elect to be treated as a corporation, partnership, or disregarded entity for Federal tax purposes

Chewco: an off-balance sheet transaction utilizing Chewco Investments, LP, a Delaware limited partnership and JEDI I

Chiricahuas: RMT Chiricahuas I through XIV, Enron LLCs taxed as partnerships used in the NOLy transaction

CIP: coordinated industry case program utilized by the IRS to coordinate the examination of large and highly diversified taxpayers

Citibank: an international provider of banking, lending, and investment services

Citigroup: U.S.-based financial services company resulting from the 1998 merger of Citicorp, the bank holding company of Citibank, NA, and Traveler's Salomon-Smith Barney

Cochise: Enron structured transaction involving tax-free transfers by the parties of REMIC regular interests to an existing wholly-owned Enron subsidiary that subsequently elected to be taxed as a REIT

Code: Internal Revenue Code of 1986, as amended

COLI: corporate owned life insurance

Commissioner: Commissioner of the IRS

Commodity prepay transaction: transactions in which Enron received upfront payments in exchange for the future delivery of a specified commodity such as crude oil or natural gas

Common Units: common ownership units of Dutch VOF

Compensation Committee: refers to the Compensation Committee of the Board of Directors of Enron. At some points in time, the Compensation Committee was also named the Compensation and Management Committee, and the Compensation and Management Development Committee.

Condor: Enron structured transaction structured to generate Federal income tax deductions involving the use of an existing partnership, Whitewing Associates, LP, between Enron and an outside investor that held Enron preferred stock

Credit Suisse First Boston: global investment banking firm that participated in LJM1 structure

CWL: Columbia Willamette Leasing, Inc.

Dabhol: power plant project in India

DASH: Enron's internal transaction deal approval sheet

DECS: debt exchangeable for common stock, a financial instrument first issued by American Express Company; also marketed by Salomon, Inc.

Deferral Plan Committee: the committee established under the 1994 Deferral Plan

D&T or Deloitte & Touche: Deloitte & Touche LLP, a U.S. based international accounting firm

Delta Energy Corporation: special purpose entity associated with commodity prepay transactions between Enron and Citigroup

Glossary of Terms Relevant to the Joint Committee on Taxation Staff Investigation, continued

Derivative: generally defined as a contract or security the value of which is derived from the price of an asset (or pool of assets) without necessarily representing ownership of the asset itself

Deutsche Bank: German corporation engaged in international banking and services businesses, and acquirer of Bankers Trust in 1999

Deutsche Morgan Grenfell: global investment bank

Disregarded entity: legal entity that is disregarded as a separate entity for Federal tax purposes, and instead is treated as a branch or division of its owner

DOL: Department of Labor

Dutch VOF: Cherokee Finance VOF

Dynegy: Dynegy, Inc., a global provider of energy and communications services that was involved in merger discussions with Enron in 2001

EBITDA: earnings before income, taxes, and depreciation and amortization

ECT: Enron Capital & Trade Resources Corp.

ECT Equity: ECT Equity Corporation

ECT Partners: ECT Investing Partners, LP

ECT Strategic: Enron Capital Trade Strategic Value Corp.

EDC: Enron Development Corporation

EDIC: Enron Diversified Investments Corporation

EDRIP: Enron Deferral Repatriation Incentive Plan

EGTRRA: The Economic Growth and Tax Relief Reconciliation Act of 2001

EI: Enron International

EIN: the Enron Intelligent Network, an all-Internet Protocol backbone

ENA: Enron North America Corp.

ENA Master Swap: periodic confirmations executed in association with an ISDA Master Agreement between ENA and RMT

EN-BT Delaware: EN-BT Delaware, Inc., a subsidiary of Bankers Trust

Enron: unless otherwise indicated, Enron Corp. and its affiliates

Enron Asset Holding: Enron Asset Holding, LLC

Enron Capital Trade: Enron Capital Trade & Resources Corp.

Enron Cash Balance Plan: the Enron Corp. Cash Balance Plan

Enron Corp.: unless otherwise indicated, the parent company Enron Corp.

Enron Corp. Proxy Statement: refers to the proxy statement prepared for the annual meeting of Enron stockholders

Enron ERISA Counsel: Frank D. ("Pat") Mackin, Jr., formerly in-house counsel on Enron qualified plans, later on retainer to provide advice relating to ERISA

Enron ESOP: the Enron Corp. Employee Stock Ownership Plan

Enron Finance: (1) Enron Finance Partners, LLC, with respect to Tammy I; (2) Enron Finance Holding Corporation, with respect to Renegade

Enron Intermediate: Enron Northwest Intermediate LLC

Enron Leasing: Enron Leasing Partners, LP

Enron Liquids: Enron Liquids Holding Corp.

Enron LP: ECT Investments Holding Corp.

Enron North: Enron office building in Houston, Texas

Enron Northwest: Enron Northwest Finance, LLC

Enron Online: Enron's global Internet-based transaction system for wholesale energy and other commodities

Enron Pipeline: Enron Pipeline Company

Enron Property: Enron Property & Services Corp.

Enron qualified plans: refers collectively to the Enron Corp. Retirement Plan/Cash Balance Plan, the Enron Corp. ESOP, and the Enron Corp. Savings Plan

Enron Retirement Plan: the Enron Corp. Retirement Plan, which was amended and renamed the Enron Corp. Cash Balance Plan

Enron Savings Plan: the Enron Corp. Savings Plan

Enron South or Enron South Building: recently built Enron office building in Houston, Texas

Enron Subsidiaries: a group of wholly owned subsidiaries of Enron

Enron 2000: financial strategy implemented by Enron in 1996 with the objectives of (1) $1 billion of net income by the year 2000; (2) 15 percent average compound annual growth; and (3) double-digit growth in each individual fiscal year

EOG: Enron Oil & Gas Company

EOTT: Enron Oil Trading & Transportation Company

EOTT Units: common units of EOTT Energy Partners, LP

EREC: Enron Renewable Energy Corp.

ERISA: Employee Retirement Income Security Act of 1974, as amended

ERNB: ERNB Partnership, Limited

Ernst & Young: Ernst & Young LLP, a U.S.-based international accounting firm

Euro: monetary unit of many members of the European Union

Executive Committee: the Executive Committee of Enron's Board of Directors

Expat Deferral Plan: the 1998 Enron Expat Services, Inc. Deferral Plan

FAS: Financial Accounting Standards

FASB: Financial Accounting Standards Board

FASIT: financial asset securitization investment trust governed by sections 860H through 860L of the Code

FERC: Federal Energy Regulatory Commission

Finance Committee: Finance Committee of Enron's Board of Directors

FPRM: fixed price and risk management contracts

FSA: field service advice issued by the IRS

FS 360: FS 360 Corp.

Form 8-K: current report to be filed with the SEC to report the occurrence of any material events or corporate changes that are of importance to investors or security holders and previously have not been reported by the company in the case of certain events

Form 10-Q: quarterly report to be filed with the SEC for each of the first three quarters of the company's fiscal year

Form 10-K: annual report to be filed with the SEC

Form 11-K: annual report to be filed with the SEC by employee stock purchase, savings, and similar plans, interests in which constitute securities registered under the Securities Act of 1933

Form 1120: IRS form, U.S. Corporation Income Tax Return

Form 5310: IRS form, Application for Determination for Terminating Plan

Form 5500: IRS form, Annual Return/Report of Employee Benefit Plan

FUTA: Federal Unemployment Tax Act

GAAP: generally accepted accounting principles

GM: General Motors Corporation

Goldman, Sachs & Co.: U.S.-based global investment banking firm

Granite: project describing the expected transfer of life insurance contracts from PGE

Grizzly: Grizzly I, LLC, a wholly owned SPE of Enron formed to participate in Raptor II

Harrier: Harrier I, LLC, a wholly owned SPE of Enron formed to participate in Raptor I

Hewitt: Hewitt Associates, starting in 2001, the recordkeeper for the Enron Savings Plan; also a consultant relating to general compensation matters

HNG: Houston Natural Gas Corporation

HNG Plan: (1) Houston Natural Gas Corporation Retirement Plan; (2) Houston Natural Gas Corporation Savings Plan

Houston Natural Gas Corporation: publicly traded natural gas pipeline company acquired by InterNorth, Inc. in 1985 to form Enron

HPL: Houston Pipeline Company

HPL Asset Holdings: HPL Asset Holdings LP

Interim Notes: senior debt obligations of Sequoia Financial Assets, LLC

InterNorth or InterNorth, Inc.: name of Enron Corp. corporate entity prior to name change to Enron Corp. in 1986

Investors BV: Choctaw Investors BV

ISDA: International Swap Dealers Association

ISDA Master Agreement: standard form agreement copyrighted by the ISDA that sets forth the terms and conditions governing any specific swaps made pursuant to the agreement among the parties to it

JEDI or JEDI I: Joint Energy Development Investments Limited Partnership

JEDI II: Joint Energy Development Investment Limited Partnership II

Joint Committee: Joint Committee on Taxation

Glossary of Terms Relevant to the Joint Committee on Taxation Staff Investigation, continued

Joint Committee staff: staff of the Joint Committee on Taxation

JP Morgan or JP Morgan Chase: J.P. Morgan Chase & Co., successor to Chase Manhattan Bank

King & Spalding: King & Spaulding LLP, an Atlanta/Washington, DC based law firm

Kingfisher: Kingfisher I LLC

LIBOR: London Interbank Offered Rate

Little River: Little River Funding LLC

LJM1: LJM Cayman, LP, a Cayman Islands limited partnership structured to engage in an off-balance sheet hedging transaction involving Rhythms Net stock

LJM2: LJM2 Co-Investment, LP, a Delaware limited partnership structured to engage in off-balance sheet hedging and miscellaneous transactions

LLC: limited liability company

LP: limited partnership

Mahonia Ltd: special purpose entity associated with certain commodity prepay transactions between JP Morgan and Enron

Maliseet: Maliseet Properties, Inc.

Mangas: Mangas I Corp.

McKee Nelson Ernst & Young: a Washington, DC based law firm

Merrill Lynch: Merrill Lynch & Co.

MIPS: monthly income preferred securities, a financial instrument marketed by Goldman Sachs & Co.

M-1 adjustment: an adjustment included in a taxpayer's reconciliation of its financial statement income with its taxable income

Monthly Operating Statements: statements of operations filed monthly by Enron with the Bankruptcy Court and the SEC during Enron's bankruptcy proceeding

National Office or IRS National Office: National Office of the Internal Revenue Service

National Westminster Bank: bank that participated in LJM1 structure

NOL: net operating loss

NOLy: Enron structured transaction designed to generate taxable income in order to use Enron's net operating loss carryovers of approximately $3 billion in its 2000 taxable year

Northern Natural Gas Company: (1) corporation formed in 1930 that later was renamed InterNorth, Inc. and ultimately became Enron Corp. in 1985; (2) later, an Enron subsidiary that was acquired by Dynegy after merger negotiations between Enron and Dynegy terminated in 2001

Northern Trust: Northern Trust Retirement Consulting, the former recordkeeper under the Enron Savings Plan

Notional principal amount: amount not actually exchanged by the parties to a notional principal contract

Notional principal contract: generally describes an agreement between two parties to exchange payments that are calculated by reference to a notional principal amount

NPW: New Power Holdings, Inc.

Off-balance sheet: not included in reporting company's balance sheet

OFL: overall foreign loss

OID: original issue discount

Ojibway: Ojibway, Inc.

Oneida: Oneida Leasing, Inc.

OPI or Organizational Partner: Organizational Partner, Inc.

PBGC: Pension Benefit Guaranty Corporation

PEP: Performance evaluation process

PFIC: a passive foreign investment company governed by sections 1291 through 1298 of the Code

PGC: Portland General Corporation, the parent holding company of PGE

PGE: Portland General Electric

PGH: Portland General Holdings

Porcupine: Porcupine I, LLC, a special purpose entity utilized in Raptor III

Potomac Capital: Potomac Capital Investment Corp., a subsidiary of Potomac Electric Power Co.

Glossary of Terms Relevant to the Joint Committee on Taxation Staff Investigation, continued

Powers Report: report of investigation by the Special Investigative Committee of the Enron Board of Directors, chaired by William C. Powers, dated February 1, 2002

Preferred Units: preferred units of Dutch VOF

Prepays: contracts that provided Enron large advance payments to deliver natural gas or other energy products

Project 50: stock option program under which employees were given a one-time grant of 50 stock options on January 18, 2000, in recognition of Enron's stock price reaching $50 after the 1999 stock split

Project Participation Plan: executive compensation program for employees in Enron's international business unit

Pronghorn: Pronghorn I, LLC, an SPE wholly owned by Enron and used in Raptor III

PSI: Permanent Subcommittee on Investigations on Governmental Affairs, United States Senate

PUHCA: Public Utility Holding Company Act

PwC: PricewaterhouseCoopers, a U.S.-based international accounting firm

Rabo: Rabo Merchant Bank NV

Rabobank: Cooperatieve Centrale Raiffeisen-Boerenleenbank B.A.

Rail Leasing: Rail Leasing, Inc.

Raptors: a series of four off-balance sheet hedging structures involving LJM2 that began in mid-2000 and terminated in 2001

REIT: real estate investment trust governed by sections 856 through 859 of the Code

REMIC: real estate mortgage investment conduit governed by sections 860A through 860G of the Code

Renegade: project in which Enron received a fee to serve as an accommodation party to enable Bankers Trust Corporation to achieve favorable tax benefits

Rheingold: Rheingold GmbH

Rhythms Net: Rhythms NetConnections, Inc., an Internet service provider for businesses using digital subscriber line technology, and a portfolio investment of Enron that became a hedged position in the LJM1 structure

RMT: Risk Management and Trading Corp.

Glossary of Terms Relevant to the
Joint Committee on Taxation Staff Investigation, continued

RMT Swaps: associated confirmations relating to ISDA Master Agreement between RMT and the Chiricahuas

Roadrunner: Roadrunner I, LLC, a wholly owned SPE of Enron formed to participate in Raptor IV

Salomon, Inc.: now Salomon Smith Barney, Inc.

SARL: Cheyenne Finance SARL

SAS: Statement on Auditing Standards

Schedule M-1: IRS schedule, Reconciliation of Income (Loss) per Books with Income per Return

SEC: Securities and Exchange Commission

Section 16 officers: officers subject to the provisions of section 16 of the Securities Exchange Act of 1934

Seminole: Seminole Capital, LLC

Senate Finance Committee: Senate Committee on Finance

Seneca: Seneca Leasing, Partners, LP

Series 1: nonvoting class of RMT preferred stock

Series 2: voting class of RMT preferred stock

SFAS: Statement of Financial Accounting Standards

Shearman & Sterling: international law firm with U.S. offices in New York and Washington, DC

Sierra: Sierra Pacific Resources

Skadden Arps: Skadden, Arps, Slate, Meagher & Flom LLP, counsel to Enron in connection with Congressional investigations and other matters

Smith Street: Smith Street Land Company

SPE: special purpose entity, typically an entity created for a limited purpose, with a limited life and limited activities

SRLY: separate return limitation year

Statement: Statement of Financial Affairs filed by Enron Corp. with the Bankruptcy Court

Steele: Enron structured transaction involving a transfer of cash and leased assets to a newly formed corporation in exchange for common and preferred stock

Straddle: offsetting positions with respect to actively traded personal property

Structured financing or structured financing transaction: for purposes of this Report, a transaction structured by Enron to acquire capital in the debt or equity markets; compare with structured transaction

Structured transaction: for purposes of this Report, a transaction structured by Enron to obtain tax benefits, accounting benefits, or a combination of the two; compare with structured financing

Summer: Enron project that attempted to sell a substantial portion of Enron's European businesses

Swap: in general, an arrangement between parties to exchange cash flows over a specified period of time based upon a notional principal amount

Swap Sub: LJM1 Swap Sub, LP

Talon: Talon I, LLC, a special purpose entity utilized in Raptor I

TAM: technical advice memorandum issued by the IRS

Tammy I: Enron structured transaction designed to generate financial statement benefits from an increase in the tax basis in the Enron South building, involving Enron's contribution of assets to a partnership that was wholly owned by Enron affiliates

Tammy II: Enron structured transaction designed to generate financial statement benefits from an increase in the tax basis in certain depreciable assets, involving Enron's contribution of assets to a partnership that was wholly owned by Enron affiliates

Tanya: Enron structured transaction designed to accelerate and duplicate certain deductions within the Enron consolidated group, involving a tax-free transfer of assets and unrelated contingent liabilities by Enron to an Enron subsidiary in exchange for stock in the subsidiary

Teesside: Enron's combined cycle gas turbine power plant in the United Kingdom

Teresa: Enron structured transaction involving a synthetic lease arrangement designed to result in an increase in tax basis in depreciable assets, including the Enron North

building, by Enron contributing depreciable assets and preferred stock to a partnership

Timberwolf: Timberwolf I, LLC, a special purpose entity utilized in Raptor II

TNPC: The New Power Company

TOLI: trust owned life insurance

Tomas: Enron structured transaction designed to increase the tax basis of a portfolio of leased assets Enron wished to dispose of, involving the formation of a partnership between an existing Enron subsidiary and two subsidiaries of Bankers Trust

TOPrS: trust originated preferred securities, a financial product marketed by Merrill Lynch

Tularosa: Delaware LLC used in Project NOLy

Tularosa Swap: total return swap between RMT and Tularosa

U.S. or United States: United States of America

Valhalla: (1) Valhalla GmbH; (2) project in which Enron received a fee to serve as an accommodation party to enable Deutsche Bank to receive certain income tax benefits under foreign law

Valkyrie: Enron Valkyrie

Valor: Enron structured transaction structured to accelerate and duplicate certain deductions within the Enron consolidated group, involving a tax-free transfer of assets and unrelated contingent liabilities by Enron to an Enron subsidiary in exchange for stock in the subsidiary

Vinson & Elkins or V&E: Vinson & Elkins LLP, a Houston based law firm and Enron's primary legal counsel

Weil Gotshal: Weil, Gotshal & Manges LLP

Wessex: Wessex Water Plc, a United Kingdom water company acquired by Enron in 1998

Whitewing or Whitewing LP: Whitewing Associates, LP

Wiltshire: Wiltshire Financial Assets, LLC

Yosemite: series of four trust structures involving the issuance by Enron of credit linked notes for commodity prepay transactions

Glossary of Terms Relevant to the Joint Committee on Taxation Staff Investigation, continued

Zephyrus: Zephyrus LLC

1993 MIPS: MIPS issued in November 1993 by Enron Capital LLC

1993 Prospectus: prospectus relating to 1993 MIPS

1994 Deferral Plan: the Enron Corp. 1994 Deferral Plan

1994 MIPS: MIPS issued in 1994

1995 Prospectus: prospectus relating to 1995 issuance of certain Enron exchangeable notes

1999 Prospectus: prospectus relating to 1999 issuance of certain Enron exchangeable notes

401(k) plan: a profit sharing or stock bonus plan (or pre-ERISA money purchase pension plan) that contains a qualified cash or deferred arrangement