



Bush Administration Contacts with Enron

Prepared for Rep. Henry A. Waxman

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I. SUMMARY

Enron Corporation was President George W. Bush's number-one career patron. Since 1993, Enron and its employees gave the President \$736,800 in political and related contributions.¹ Prior to the collapse of Enron in December 2001, the company appeared to have wide access to officials in the White House and federal agencies.

Questions have been raised about the number of contacts the company had with the Bush Administration. To date, however, the Administration has refused to provide a comprehensive accounting of its contacts with Enron. In January, the Bush Administration wrote Rep. Henry A. Waxman to disclose six contacts between Enron and White House officials on energy policy.² Four months later, the Administration wrote Senator Lieberman to disclose at least 18 additional contacts on energy policy.³ The letter to Senator Lieberman purported to disclose "instances in which Enron communicated with individuals within the EOP or OVP on matters . . . relating to issues of law, regulation, or policy affecting Enron's business." Yet the letter failed to disclose significant Enron contacts with the White House, such as Enron Chairman Ken Lay's conversation in October 2001 with OMB Director Mitch Daniels about the repeal of the alternative minimum income tax.⁴

At the request of Rep. Waxman, this report seeks to provide at least a minimum list of all known contacts between the Administration and Enron in 2001. The report finds that there were at least 112 contacts between Enron and White House or other Administration officials during 2001. The largest number of known contacts -- 40 contacts in total -- were between Enron and White House officials. The White House officials involved in these contacts included Vice President Cheney, presidential advisor Karl Rove, White House economic advisor Lawrence Lindsey, White House personnel director Clay Johnson, and White House energy task force director Andrew Lundquist.

During 2001, there were also at least 14 contacts with the Commerce Department; 10 contacts with the Energy Department; 9 contacts with the Treasury Department; 5 contacts with the Commodity Futures Trading Commission; 5 contacts with the Federal Energy Regulatory Commission; 4 contacts with the US Export-Import Bank; 4 contacts with the Overseas Private

¹Center for Responsive Politics (on line at http://www.opensecrets.org/alerts/v6/enron_bush.asp).

²See Letter from David S. Addington to Rep. Henry A. Waxman (Jan. 3, 2002).

³See Letter from Alberto R. Gonzales to Sen. Joseph I. Lieberman (May 22, 2002).

⁴See Letter from Rep. Henry A. Waxman to Sen. Joseph Lieberman (May 23, 2002) (on line at http://www.house.gov/reform/min/pdfs/pdf_inves/pdf_admin_enron_may_23_lieberman_let.pdf).

Investment Corporation; 3 contacts with the US Trade Representative; 2 contacts each with the Agriculture Department, the Environmental Protection Agency, the Federal Communications Commission, the International Trade Commission, the State Department, the Surface Transportation Board, and the Department of Transportation; and 1 contact each with the Federal Reserve, the Interior Department, the National Oceanic and Atmospheric Administration, and the Securities and Exchange Commission.

The estimate of contacts between Enron and the Administration in this report is likely to underestimate significantly the total number of contacts. For example, although 14 lobbying groups filed disclosure forms indicating that they lobbied for Enron in 2001, this report does not list meetings between Administration officials and those outside lobbyists. Lobbying records indicate that Enron and its subsidiaries spent over \$3 million on those outside lobbyists, who included Ed Gillespie, Marc Racicot, Ed Buckham, and Jack Quinn. Moreover, the methodology used to count contacts between in-house Enron lobbyists and Administration officials is likely to underestimate the actual number of contacts. The report also does not include any of the 73 disclosed contacts that former Enron executive Thomas White had with Enron officials while serving as Secretary of the Army.

II. METHODOLOGY

The information in this report is based on documents and other information disclosed by the Administration, press stories, and Enron's 2001 lobbying disclosure reports. The report uses the same definition of "contact" as that employed by the statutorily mandated lobbying disclosure reports: namely, "any oral or written communication (including an electronic communication)."⁵

A conservative approach was used to estimate contacts from Enron's lobby disclosure forms. Enron filed two lobbying disclosure forms in 2001: one for the first six months of the year and another for the last six months. Each disclosure form is broken down into defined issue areas, such as taxes or the environment. The form identifies the agencies or departments that Enron contacted with respect to each issue but it does not disclose when the contact occurred or how many contacts took place. This report assumes conservatively that each department or agency listed was contacted only once with respect to the particular issue area under which it is listed in each report. Moreover, to avoid double-counting, the report subtracts the number of contacts disclosed by the Administration or the press from the contacts disclosed on the lobby disclosure forms.

The lobby disclosure forms for registered lobbyists hired by Enron also include information on contacts with Administration officials. These forms reveal that Enron hired 36 outside lobbyists during 2001, spending over \$3 million. Those lobbyists contacted numerous federal agencies during 2001. There is no way, however, to determine when contacts involving the outside lobbyists also involved in-house Enron lobbyists and would be covered under the

⁵2 U.S.C. § 1602.

lobby disclosure forms filed by Enron. To be conservative, therefore, this report did not count any contacts between Enron's outside lobbyists and Administration officials.

In an effort to be conservative, the report also did not count other contacts between Administration officials and Enron. Army Secretary Thomas White has admitted that he had at least 73 different contacts with Enron officials since joining the Administration in May 2001.⁶ These contacts included meetings and phone conversations with senior Enron executives -- including Mr. Lay, former vice chairman Joe Sutton, and former president Greg Whalley -- as well as Enron board members. The actual number of contacts is probably higher, as Secretary White has failed to disclose calls he received at home from Enron officials. Because Secretary White has maintained that his Enron contacts were personal in nature, none of these contacts are included in this report.

In addition, the report does not count any of the 367 meetings between FERC employees and Enron-affiliated personnel from May 2000 to June 2001 that FERC Chairman Pat Wood recently disclosed because it is not clear how many of the contacts took place in 2001.⁷

III. CHRONOLOGY OF CONTACTS

- Early 2001** Enron chairman Ken Lay telephoned presidential advisor Karl Rove to express support for the appointment of Nora Brownell to FERC and express concern that she was being discouraged from accepting the position. Letter from Alberto R. Gonzales to Sen. Joseph I. Lieberman (May 22, 2002).
- Early 2001** An aide to Vice President Cheney, Steve Ruhlen, had "a small number" of phone calls with Pat Shortridge, an Enron lobbyist who wanted information about the likely components of the unreleased national energy plan. Letter from Alberto R. Gonzales to Sen. Joseph I. Lieberman (May 22, 2002). **Counted as two contacts.**
- Early 2001** Enron chairman Ken Lay called presidential advisor Karl Rove to suggest that he meet with the head of the Environmental Defense Fund. Letter from Alberto R. Gonzales to Sen. Joseph I. Lieberman (May 22, 2002).
- Early 2001** Enron chairman Ken Lay made two calls to White House personnel director Clay Johnson to follow up on Mr. Lay's January 8, 2001, letter recommending seven

⁶See Letter from Thomas White to Rep. Henry A. Waxman (Jan. 22, 2002); Letter from Thomas White to Rep. Henry A. Waxman (Mar. 22, 2002).

⁷Testimony of Pat Wood, III, Chairman, Federal Energy Regulatory Commission, Senate Committee on Commerce, Science and Transportation, Subcommittee on Consumer Affairs, Foreign Commerce and Tourism, *Hearing on Examining Enron: Developments Regarding Electricity Price Manipulation in California*, 107th Cong. (May 15, 2002).

candidates for appointment to FERC, including Pat Wood and Nora Brownell. Mr. Johnson sent a letter to Mr. Lay on March 6 thanking him for his recommendation of Pat Wood. Letter from Alberto R. Gonzales to Sen. Joseph I. Lieberman (May 22, 2002). **Counted as two contacts.**

**Winter/
Spring 2001** White House economic advisor Lawrence Lindsey “had a few communications” with Enron chairman Ken Lay, “most likely” about the California energy crisis. Letter from Alberto R. Gonzales to Sen. Joseph I. Lieberman (May 22, 2002). **Counted as two contacts.**

Spring 2001 John Howard of the Council on Environmental Quality attended two meetings about multi-emissions with the Clean Power Group, which included unidentified representatives from Enron. Letter from Alberto R. Gonzales to Sen. Joseph I. Lieberman (May 22, 2002). **Counted as two contacts.**

Fall 2001 John Howard of the Council on Environmental Quality spoke with an unidentified representative of Enron Windpower. Letter from Alberto R. Gonzales to Sen. Joseph I. Lieberman (May 22, 2002).

1/29/01 Enron was a signatory to a letter from the Coalition for U.S.-Vietnam Trade to the President urging support for a comprehensive bilateral trade agreement with Vietnam. Letter from Alberto R. Gonzales to Sen. Joseph I. Lieberman (May 22, 2002).

2/7/01 Enron chairman Ken Lay attended a meeting with Administration officials including Commerce Secretary Don Evans and economic advisor Lawrence Lindsey, as part of a delegation of around twenty business leaders. President Bush also met with the group and sent Mr. Lay and other participants a letter of thanks. Letter from Alberto R. Gonzales to Sen. Joseph I. Lieberman (May 22, 2002).

2/9/01 Enron chairman Ken Lay spoke to then-FERC chairman Curt Hebert regarding Mr. Hebert remaining as the head of FERC. Letter from Pat Wood, III, to Sen. Barbara Boxer (Feb. 21, 2002).

2/12/01 Enron Energy Services was a signatory to a letter to Energy Secretary Abraham recommending the development of a National Energy Reliability Initiative. The letter was copied to a number of White House officials. Letter from Alberto R. Gonzales to Sen. Joseph I. Lieberman (May 22, 2002).

2/22/01 Enron chairman Ken Lay and Enron lobbyist Linda Robertson met with energy task force executive director Andrew Lundquist to discuss energy policy. Letter from Alberto R. Gonzales to Sen. Joseph I. Lieberman (May 22, 2002).

- 3/6/01** A group of people including Enron representative Thomas Briggs attended a meeting which White House economic advisor Robert McNally may have attended. Letter from Alberto R. Gonzales to Sen. Joseph I. Lieberman (May 22, 2002).
- 3/07/01** Enron executive David Haug met with energy task force executive director Andrew Lundquist. Lewis Libby, chief of staff to the Vice President, was also present “for several minutes.” Letter from Alberto R. Gonzales to Sen. Joseph I. Lieberman (May 22, 2002).
- 3/29/01** Energy Secretary Abraham and other DOE officials met with Enron and other California electricity suppliers. DOE documents (Bate stamps 8330 and 25874).
- 4/5/01** Enron CEO Jeffrey Skilling met with Treasury Secretary Paul O’Neill for a half-hour to discuss the West Coast energy crisis. *Skilling, O’Neill Met During Tenure on Energy Panel*, Wall Street Journal (Mar. 11, 2002).
- 4/6/01** White House economic advisors Lawrence Lindsey, Marcus Sumerlin, and Robert McNally met with Enron chairman Ken Lay and Enron lobbyist Linda Robertson about electricity and bundling issues. Letter from Alberto R. Gonzales to Sen. Joseph I. Lieberman (May 22, 2002).
- 4/9/01** Enron representative Thomas Briggs and other utility representatives met with energy task force staff. Letter from Alberto R. Gonzales to Sen. Joseph I. Lieberman (May 22, 2002); Letter from David S. Addington to Rep. Henry A. Waxman (Jan. 3, 2002).
- 4/17/01** Enron chairman Ken Lay and Enron lobbyist Linda Robertson met with Vice President Cheney for 30 minutes to discuss energy matters, including the California energy crisis. Letter from Alberto R. Gonzales to Sen. Joseph I. Lieberman (May 22, 2002); Letter from David S. Addington to Rep. Henry A. Waxman (Jan. 3, 2002).
- 4/17/01** White House economic advisor Robert McNally met with Enron employees Lisa Jacobson and Jeffrey Keeler. Letter from Alberto R. Gonzales to Sen. Joseph I. Lieberman (May 22, 2002).
- 4/20/01** Enron lobbyist Linda Robertson sent an e-mail to White House economic advisor Robert McNally. Letter from Alberto R. Gonzales to Sen. Joseph I. Lieberman (May 22, 2002).
- 4/26/01** President Bush and Enron chairman Ken Lay attended a Houston fundraiser for former-First Lady Barbara Bush’s literacy program. *President Calls for Review of*

Pension Regulations and Corporate Disclosure Rules, White House (Jan. 10, 2002) (on line at <http://www.whitehouse.gov/news/releases/2002/01/20020110-1.html>).

- 5/01** FERC official Charles Whitmore met with Enron vice president James Steffes. Letter from Pat Wood, III, to Sen. Barbara Boxer (Feb. 21, 2002).
- 5/15/01** Thomas Briggs of Enron attended a meeting with other representatives of renewable energy as part of the build-up to the release of the energy task force report. The Vice President “dropped by.” Letter from Alberto R. Gonzales to Sen. Joseph I. Lieberman (May 22, 2002).
- 5/23/01** White House economic advisor Robert McNally met with Enron lobbyists Linda Robertson and Richard Shapiro. Letter from Alberto R. Gonzales to Sen. Joseph I. Lieberman (May 22, 2002).
- 5/23/01** Kyle McSlarrow, Energy Secretary Spencer Abraham’s chief of staff, met with Enron representatives David Lugar, Linda Robertson, and Rick Shapiro. DOE document (Bate stamp 25991). This was apparently preceded by a meeting between DOE official Joe Kelliher and Enron representatives Rick Shapiro, Linda Robertson, and Lora Sullivan. DOE document (Bate stamp 26284). **Counted as two contacts.**
- 6/1/01** White House economic advisor Robert McNally met with the Clean Power Group about multi-emissions issues. Enron representatives Pat Shortridge, Lisa Jacobson, and Jeffrey Keeler attended. Letter from Alberto R. Gonzales to Sen. Joseph I. Lieberman (May 22, 2002).
- 6/20/01** Philippa Malmgren, a White House economic advisor, met with Nicholas O’Day of Enron’s Tokyo office “to discuss issues related to the Japanese economy and markets.” Letter from Alberto R. Gonzales to Sen. Joseph I. Lieberman (May 22, 2002).
- 6/22/01** DOE official Joe Kelliher met with Enron representatives John Shelk and Linda Robertson. DOE document (Bate stamp 26306).
- 6/24/01** Enron chairman Ken Lay and Vice President Cheney served together on a panel in Colorado sponsored by the American Enterprise Institute regarding energy matters. Letter from David S. Addington to Rep. Henry A. Waxman (Jan. 3, 2002).
- 6/28/01** Jeffrey Keeler of Enron attended a meeting to discuss new source review sponsored by EPA. Representatives of the Office of Management and Budget and the Council of Economic Advisors also attended. Letter from Alberto R.

Gonzales to Sen. Joseph I. Lieberman (May 22, 2002).

- 6/28/01** FERC official Daniel Larcamp met with four Enron representatives including Richard Shapiro and, possibly, Ray Alvarez, Alan Larsen, and Linda Robertson. Letter from Pat Wood, III, to Sen. Barbara Boxer (Feb. 21, 2002).
- 8/7/01** Thomas Briggs of Enron met with energy task force deputy executive director Karen Knutson and White House advisor Kirk Blalock to discuss Enron's difficulties in Germany. Letter from Alberto R. Gonzales to Sen. Joseph I. Lieberman (May 22, 2002).
- 8/15/01** White House economic advisor Robert McNally met with Enron lobbyist Pat Shortridge. Letter from Alberto R. Gonzales to Sen. Joseph I. Lieberman (May 22, 2002).
- 9/13/01** Enron executive vice president David Haug met with Cheryl Oldham of the Office of Presidential Personnel to discuss his working for the Administration. Enron chairman Ken Lay had sent a December 13, 2000, letter to White House personnel director Clay Johnson recommending Mr. Haug (as well as Enron executive Jim Bannantine and management consultant Bill Lewis). An unidentified private attorney representing Enron had also recommended Mr. Haug. Letter from Alberto R. Gonzales to Sen. Joseph I. Lieberman (May 22, 2002).
- 9/19/01** Department of Energy Deputy Secretary Frank Blake met with Enron executives Mark Frevert and Linda Robertson. They reportedly discussed gas and energy legislation. *Local Firm Swept into Energy Industry Review*, Houston Chronicle (April 12, 2002).
- 9/20/01** FERC chairman Pat Wood met with Enron officials Stan Horton, Mark Frevert, and Steve Kean and other pipeline company officials. Letter from Pat Wood, III, to Rep. Joe Barton (Feb. 28, 2002).
- 10/3/01** FERC chairman Pat Wood spoke to an energy policy conference in Virginia and sat at the speakers' table with Enron Chairman Ken Lay. Letter from Pat Wood, III, to Rep. Joe Barton (Feb. 28, 2002).
- 10-11/01** Enron's president, Greg Whalley, called Treasury Undersecretary Peter Fisher six or eight times to ask the government to urge bankers to extend credit to the struggling company. *Enron Chief Asked Treasury Official To Intervene for Credit Extension Last Year*, Associated Press (Jan. 11, 2002). **Counted as six contacts.**
- 10/10/01** Vice Presidential aide Andrew Lundquist and White House economic advisor Robert McNally met with Enron representatives Neal Gerstandt, Emilio Vicens,

and John Hardy. Mr. Lundquist had served as executive director of the Vice President's energy task force, which officially disbanded at the end of September 2001. Letter from Alberto R. Gonzales to Sen. Joseph I. Lieberman (May 22, 2002). (This may be the same Lundquist meeting disclosed in the Jan. 3, 2002, letter from David S. Addington to Rep. Henry A. Waxman)

- 10/11/01** Enron Chairman Ken Lay called White House Budget Director Mitch Daniels to discuss economic stimulus legislation that repealed the corporate alternative minimum tax. *Enron Head Also Called OMB Chief; Economic Stimulus Discussed*, Atlanta Journal and Constitution (Jan. 16, 2002).
- 10/15/01** Commerce Secretary Don Evans called Enron Chairman Ken Lay while Secretary Evans was in Russia leading a trade mission. The call reportedly dealt with an Enron energy project in India. *Enron on Its Own, Cabinet Members Say*, San Francisco Chronicle (Jan. 14, 2002).
- 10/19/01** Council on Environmental Quality staffer Elizabeth Stople met with the Clean Power Group, including Enron employees Pat Shortridge and Lisa Jacobson, to discuss multi-emissions issues. Letter from Alberto R. Gonzales to Sen. Joseph I. Lieberman (May 22, 2002).
- 10/26/01** Enron Chairman Ken Lay telephoned Federal Reserve chairman Alan Greenspan. *In Its Dying Days, Enron Reaches Out to Washington, but Finds No Lifeline To Break Its Fall*, Associated Press (Jan. 20, 2002).
- 10/28/01** Treasury Secretary Paul O'Neill spoke by telephone with Enron Chairman Ken Lay, who reportedly told him about the troubles Enron was facing. *Enron Asked for Help from Cabinet Officials; CEO Sought Intervention before Bankruptcy*, Washington Post (Jan. 11, 2002).
- 10/29/01** Enron Chairman Ken Lay spoke to Commerce Secretary Don Evans to discuss the decision by Moody's to downgrade Enron's credit rating. *Enron Asked for Help from Cabinet Officials; CEO Sought Intervention before Bankruptcy*, Washington Post (Jan. 11, 2002).
- 11/2/01** Energy Secretary Spencer Abraham telephoned Enron Chairman Ken Lay to ask about Enron. *Bush Aides Deny Help to Enron*, Pittsburgh Post-Gazette (Jan. 14, 2002). The Energy Department also revealed that Enron officials had two meetings with two senior department officials. *Subpoenas on Enron Issued; Calls to Aide Cited*, Boston Globe (Jan. 12, 2002). **Counted as three contacts.**
- 11/8/01** Enron Chairman Ken Lay spoke to Treasury Secretary Paul O'Neill about Enron's financial situation. *Enron Asked for Help from Cabinet Officials; CEO Sought Intervention before Bankruptcy*, Washington Post (Jan. 11, 2002).

- undated** A number of Enron-affiliated persons, including Enron CEO Ken Lay on occasion, attended ceremonial or group events at the White House, such as the 2001 Easter egg roll, a tee-ball game, remarks to the Horatio Alger Association, and other presidential and vice-presidential speeches, as well as social and charitable correspondence and events. Letter from Alberto R. Gonzales to Sen. Joseph I. Lieberman (May 22, 2002). **Counted as four contacts.**
- undated** White House economic advisor Robert McNally had an undisclosed number of telephone talks with unidentified Enron representatives. Letter from Alberto R. Gonzales to Sen. Joseph I. Lieberman (May 22, 2002). **Counted as two contacts.**
- undated** Enron Chairman Ken Lay spoke with White House economic advisor Lawrence Lindsey after the Sept. 11 attacks to say that confidence and investment plans were deteriorating in the wake of the attacks. Letter from Alberto R. Gonzales to Sen. Joseph I. Lieberman (May 22, 2002).
- undated** Enron had at least fourteen lobbying contacts with the Department of Commerce. Enron Corp. 2001 Amended Mid-Year Lobbying Report (Mar. 1, 2002); Enron Corp. 2001 Year-End Lobbying Report (Feb. 14, 2002). It is not clear whether these fourteen contacts include the two Commerce contacts listed above. **Counted as twelve contacts.**
- undated** Enron had at least five lobbying contacts with the Commodity Futures Trading Commission. Enron Corp. 2001 Amended Mid-Year Lobbying Report (Mar. 1, 2002); Enron Corp. 2001 Year-End Lobbying Report (Feb. 14, 2002). **Counted as five contacts.**
- undated** Enron had at least four lobbying contacts with the US Export-Import Bank. Enron Corp. 2001 Amended Mid-Year Lobbying Report (Mar. 1, 2002); Enron Corp. 2001 Year-End Lobbying Report (Feb. 14, 2002). **Counted as four contacts.**
- undated** Enron had at least four lobbying contacts with the Overseas Private Investment Corporation. Enron Corp. 2001 Amended Mid-Year Lobbying Report (Mar. 1, 2002); Enron Corp. 2001 Year-End Lobbying Report (Feb. 14, 2002). **Counted as four contacts.**
- undated** Enron had at least three lobbying contacts with the US Trade Representative. Enron Corp. 2001 Amended Mid-Year Lobbying Report (Mar. 1, 2002); Enron Corp. 2001 Year-End Lobbying Report (Feb. 14, 2002). **Counted as three contacts.**
- undated** Enron had at least two lobbying contacts with the Department of Agriculture. Enron Corp. 2001 Amended Mid-Year Lobbying Report (Mar. 1, 2002); Enron Corp. 2001 Year-End Lobbying Report (Feb. 14, 2002). **Counted as two contacts.**

- undated** Enron had at least two lobbying contacts with the Federal Communications Commission. Enron Corp. 2001 Amended Mid-Year Lobbying Report (Mar. 1, 2002); Enron Corp. 2001 Year-End Lobbying Report (Feb. 14, 2002). **Counted as two contacts.**
- undated** Enron had at least two lobbying contacts with the International Trade Commission. Enron Corp. 2001 Amended Mid-Year Lobbying Report (Mar. 1, 2002); Enron Corp. 2001 Year-End Lobbying Report (Feb. 14, 2002). **Counted as two contacts.**
- undated** Enron had at least two lobbying contacts with the State Department. Enron Corp. 2001 Amended Mid-Year Lobbying Report (Mar. 1, 2002); Enron Corp. 2001 Year-End Lobbying Report (Feb. 14, 2002). **Counted as two contacts.**
- undated** Enron had at least two lobbying contacts with the Surface Transportation Board. Enron Corp. 2001 Amended Mid-Year Lobbying Report (Mar. 1, 2002); Enron Corp. 2001 Year-End Lobbying Report (Feb. 14, 2002). **Counted as two contacts.**
- undated** Enron had at least two lobbying contacts with the Transportation Department. Enron Corp. 2001 Amended Mid-Year Lobbying Report (Mar. 1, 2002); Enron Corp. 2001 Year-End Lobbying Report (Feb. 14, 2002). **Counted as two contacts.**
- undated** Enron had at least ten lobbying contacts with the Department of Energy. Enron Corp. 2001 Amended Mid-Year Lobbying Report (Mar. 1, 2002); Enron Corp. 2001 Year-End Lobbying Report (Feb. 14, 2002); Enron Wind Corp. 2001 Mid-Year Lobbying Report (Mar. 1, 2002); Enron Wind Corp. 2001 Year-End Lobbying Report (Feb. 14, 2002). It is not clear whether these ten contacts include the nine DOE contacts listed above. **Counted as one contact.**
- undated** Enron had at least two lobbying contacts with EPA. Enron Corp. 2001 Amended Mid-Year Lobbying Report (Mar. 1, 2002); Enron Corp. 2001 Year-End Lobbying Report (Feb. 14, 2002). It is not clear whether these two contacts include the one EPA contact listed above. **Counted as one contact.**
- undated** Enron had at least one lobbying contact with the Interior Department. Enron Corp. 2001 Amended Mid-Year Lobbying Report (Mar. 1, 2002); Enron Corp. 2001 Year-End Lobbying Report (Feb. 14, 2002). **Counted as one contact.**
- undated** Enron had at least one lobbying contact with the National Oceanic and Atmospheric Administration. Enron Corp. 2001 Amended Mid-Year Lobbying Report (Mar. 1, 2002); Enron Corp. 2001 Year-End Lobbying Report (Feb. 14, 2002). **Counted as one contact.**
- undated** Enron had at least one lobbying contact with the Securities and Exchange

Commission. Enron Corp. 2001 Amended Mid-Year Lobbying Report (Mar. 1, 2002); Enron Corp. 2001 Year-End Lobbying Report (Feb. 14, 2002). **Counted as one contact.**