

**UNITED STATES OF AMERICA  
BEFORE THE  
SECURITIES AND EXCHANGE COMMISSION**

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In the Matter of :

Applications of Enron Corp. for Exemptions : Administrative Proceeding  
Under the Public Utility Holding Company Act :  
of 1935, (Nos. 70-9661 and 70-10056). : File No. 3-10909

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**MOTION FOR ORAL ARGUMENT**

Pursuant to Rule 451 of the Commission's Rules of Practice, 17 C.F.R. § 201.451, and the Commission's Order Granting Petitions for Review, Denying Motion for Leave to Intervene Out of Time, and Scheduling Briefs issued on June 11, 2003,<sup>1</sup> Enron Corp. ("Enron") hereby respectfully requests that the Commission hear oral argument in support of Enron's petition for review of the Initial Decision issued on February 6, 2003 in the above captioned proceeding ("Initial Decision").

The Commission's Rules provide that "motions for oral argument with respect to whether to affirm all or part of an initial decision by a hearing officer shall be granted unless exceptional circumstances make oral argument impractical or inadvisable." Rule 451(a). Enron submits that no exceptional circumstances in this case make oral argument impractical or inadvisable. Rather, there are important and complex issues for the Commission to consider that require thorough and careful examination. Enron requests the opportunity to be heard on such issues.

Enron requests that the maximum time allowed under the Rules be afforded for its presentation. Enron further submits that it does not have, with respect to its petition for review, a

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<sup>1</sup> Holding Co. Act Release No. 27685 (June 11, 2003).

common interest with any other person and therefore it should not be required to share its allotted time with other parties or limited participants.

Wherefore, for the foregoing reasons, Enron respectfully requests that the Commission schedule oral arguments in this proceeding.

Respectfully submitted,

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Dated: July 21, 2003