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PACIFIC GAS AND ELECTRIC COMPANY

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

In re
PACIFIC GAS AND ELECTRIC
COMPANY, a California corporation,
Debtor.
Federal I.D. No. 94-0742640

Case No. 01-30923 DM
Chapter 11
HEARING
Date: May 9, 2001
Time: 9:30 a.m.
Place: 235 Pine Street, 22nd Floor
San Francisco, California

HOWARD
RICE
NEMEROVSKI
CANADY
FALK
& RABKIN
A Professional Corporation

NOTICE OF DEBTOR'S MOTION AND MOTION FOR ORDER
APPROVING STIPULATION: (I) AUTHORIZING USE OF CASH
COLLATERAL PURSUANT TO 11 U.S.C. § 363 AND BANKRUPTCY
RULE 4001 AND (II) GRANTING ADEQUATE PROTECTION
PURSUANT TO 11 U.S.C. §§ 361 AND 363

[SUPPORTING MEMORANDUM OF POINTS AND AUTHORITIES AND
DECLARATION OF KENT HARVEY FILED HERewith]

PLEASE TAKE NOTICE that on May 9, 2001, at 9:30 a.m., or as soon thereafter as
the matter may be heard, in the Courtroom of the Honorable Dennis Montali, located at 235
Pine Street, 22nd Floor, San Francisco, California, Pacific Gas and Electric Company, the
debtor and debtor in possession in the above-captioned Chapter 11 case (the "Debtor" or
"PG&E"), will and hereby does move the Court (the "Motion") for entry of an order

Pool off

1 approving a proposed Stipulation: (I) Authorizing and Restricting Use of Cash Collateral
2 Pursuant to 11 U.S.C. § 363 and Bankruptcy Rule 4001 and (II) Granting Adequate
3 Protection Pursuant to 11 U.S.C. §§ 361 and 363 (the "Stipulation"). By this Motion, PG&E
4 seeks approval from the Court to enter into and perform its obligations under the Stipulation
5 with BNY Western Trust Company, as successor trustee pursuant to a certain indenture with
6 respect to certain mortgage bonds issued by PG&E.

7 The Motion is based on this Notice of Motion and Motion, the supporting
8 Memorandum of Points and Authorities and Declaration of Kent Harvey submitted herewith,
9 the record of this case and any admissible evidence presented to the Court at or prior to the
10 hearing on this Motion.

11 **PLEASE TAKE FURTHER NOTICE** that pursuant to the Court's April 9, 2001
12 Order on Emergency Motion For Orders: (1) Authorizing Interim Use Of Cash Collateral In
13 Which Mortgage Bondholders Have A Beneficial Interest; (2) Scheduling And Establishing
14 Deadlines Relating To A Final Hearing On Continued Use Of Cash Collateral; and (3) After
15 Conclusion Of A Final Hearing, Authorizing Continued Use Of Cash Collateral, any
16 opposition to the Motion must be filed with the Bankruptcy Court and served upon
17 appropriate parties (including counsel for the Debtor) no later by May 4, 2001.

18 DATED: April 20, 2001

19 Respectfully,

20 HOWARD, RICE, NEMEROVSKI, CANADY,
21 FALK & RABKIN
22 A Professional Corporation

23 By: *Jimmy Lopez*
for JAMES L. LOPES

24 Attorneys for Debtor and Debtor in Possession
25 PACIFIC GAS AND ELECTRIC COMPANY

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