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6 Telephone: (213) 891-0700
7 Facsimile: (213) 896-0400

50-275/323

8 Attorneys for Creditor, BTM Capital
9 Corporation

10 **UNITED STATES BANKRUPTCY COURT**
11 **NORTHERN DISTRICT OF CALIFORNIA**
12 **SAN FRANCISCO DIVISION**

13 In re

14 PACIFIC GAS AND ELECTRIC)
15 COMPANY, a California)
16 corporation,)

17 Debtor and Debtor In Possession.)

Case No. 01 30923 DM
Chapter 11

**REQUEST FOR SPECIAL NOTICE AND
INCLUSION IN MAILING LIST**

[No Hearing Required]

18 **TO THE CLERK OF THE COURT AND ALL PARTIES IN INTEREST:**

19 **PLEASE TAKE NOTICE** that BTM Capital Corporation ("BTM"), a creditor of the
20 above-captioned Debtor and Debtor In Possession, through its attorneys, Buchalter, Nemer, Fields
21 & Younger ("BNF&Y"), hereby requests that all counsel of record provide BNF&Y with copies of
22 all notices, pleadings, and other papers filed in the above-captioned case. All counsel of record are
23 requested to direct all written or telephonic communications to BNF&Y as follows:

24 Scott O. Smith, Esq.
25 **BUCHALTER, NEMER, FIELDS & YOUNGER**
26 601 South Figueroa Street, Suite 2400
27 Los Angeles, California 90017
28 Telephone: (213) 891-0700
Facsimile: 213) 896-0400

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o/i

1 and to BTM:
2 Thomas C. Walsh, Esq.
3 BTM CAPITAL CORPORATION
4 125 Summer Street
5 Boston, MA 02110

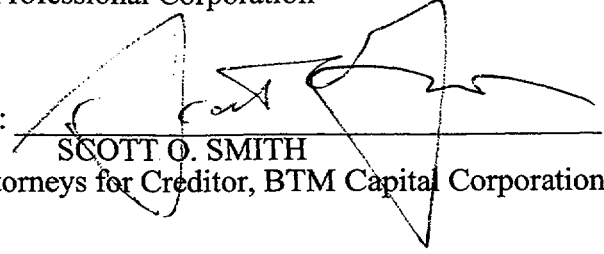
6 **PLEASE TAKE FURTHER NOTICE** that this request is made pursuant to 11 U.S.C.
7 §1109 (b), and includes the type of notice referred to in Federal Rules of Bankruptcy Procedure
8 2002, 3017, 9007 and 9010, and includes, without limitation, all schedules, requests, notices,
9 motions, orders, applications, complaints, proposed plans and all amendments thereto, disclosure
10 statements, plans of reorganization, or other pleadings and documents. This request encompasses
11 all communications brought before the Court in this case, whether formal or informal, whether
12 written or oral, and whether transmitted or conveyed by mail, telephone, facsimile, or otherwise.
13 This request also includes all documents required to be submitted pursuant to the Notice
14 Requirements of the United States Trustee and Guidelines of the United States Trustee's office (e.g.,
operating reports, interim statements, professional fee statements).

15 **PLEASE TAKE FURTHER NOTICE** that BNF&Y additionally requests that the Debtor
16 and the Clerk of the Court place the undersigned counsel and its address on any mailing matrix or
17 list of creditors to be prepared or existing in the above-captioned case.

18 **PLEASE TAKE FURTHER NOTICE** that BTM and BNF&Y do not by the filing of this
19 request, consent to the jurisdiction or venue of this Court or venue of the case to hear or determine
20 any matter in which it may be involved, nor is it to be construed as a waiver of any objections
21 thereto. Further, this request is without prejudice to BTM's remedies and claims against other
22 entities and shall not be deemed or construed to be a waiver of BTM's rights (i) to have final orders
23 and non-core matters entered only after a de novo review by a district court, (ii) to trial by jury in
24 any proceedings so triable in this case or in any controversy or proceeding related to this case, (iii)
25 to have the district court withdraw the reference in any matter subject to mandatory or discretionary
26 withdrawal, or (iv) with respect to any other rights, claims, actions, defenses, setoffs or recoupments
27 to which BTM is or may be entitled in law or in equity, all of which rights, claims, actions,
28 defenses, setoffs and recoupments are expressly reserved.

1 DATED: April 17, 2001

BUCHALTER, NEMER, FIELDS & YOUNGER
A Professional Corporation

2
3
4 By: 
SCOTT O. SMITH
Attorneys for Creditor, BTM Capital Corporation

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1 PROOF OF SERVICE

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3 I am employed in the County of Los Angeles, State of California. I am over the age
4 of 18 and not a party to the within action. My business address is at Buchalter, Nemer,
5 Fields & Younger, A Professional Corporation, 601 South Figueroa Street, Suite 2400,
6 Los Angeles, California 90017-5704.

7 On April 18, 2001, I served the foregoing document described as: **REQUEST**
8 **FOR SPECIAL NOTICE** on all other parties and/or their attorney(s) of record to this
9 action by placing a true copy thereof in a sealed envelope as follows:

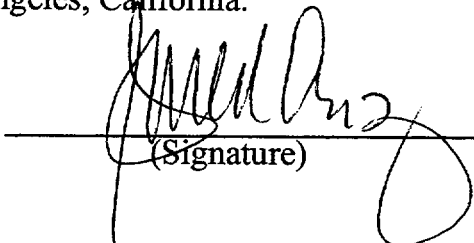
10 *****SEE ATTACHED LIST*****

11 **BY MAIL** I am a resident of, or employed in, the county where the mailing
12 occurs; I am over the age of 18 years and am not a party to the cause. I am readily familiar
13 with the business' practice for collection and processing of correspondence for mailing
14 with the United States Postal Service. The correspondence will be deposited with the
15 United States Postal Service this same day in the ordinary course of business. The
16 address(es) shown above is(are) the same as shown on the envelope. The envelope was
17 placed for deposit in the United States Postal Service at Buchalter, Nemer, Fields &
18 Younger in Los Angeles, California on April 18, 2001. The envelope was sealed and
19 placed for collection and mailing with first-class prepaid postage on that date following
20 ordinary business practices. Service made pursuant to CCP § 1013a(3), upon motion of a
21 party served, shall be presumed invalid if the postal cancellation date or postage meter date
22 on the envelope is more than one day after the date of deposit for mailing contained in the
23 affidavit.

24 **Federal** I declare that I am employed in the office of a member of the bar of
25 this court at whose direction the service was made.

26 Executed on April 18, 2001, at Los Angeles, California.

27 Amada Mendez-Cruz

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(Signature)

SERVICE LIST

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PACIFIC GAS & ELECTRIC
P.O. Box 7442
San Francisco, CA 94120
Debtor and Debtor In Possession

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William J. Lafferty, Esq.
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(Proposed) Attorneys for Creditors' Committee

Governmental & Regulatory Entities

California Power Exchange
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2000 S. Los Robles Avenue
Suite 400
Pasadena, CA 91101-2482

California Power Exchange
Attn: Don Deach
100 S. Fremont Ave., Bldg. A9
Alhambra, CA 91803-4737

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California Public Utilities Comm.
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California Public Utilities Comm.
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(Attorney for California Public
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Secretary of Treasury
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Washington, D.C. 20549

Securities Exchange Commission
Attn: Sandra W. Lavigna
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Los Angeles, CA 90036

California State Board of
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Sacramento, CA 94279-8063

Department of Justice
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Internal Revenue Service
Fresno, CA 93888

Internal Revenue Service
Spec Proc/Bankruptcy
1301 Clay Street, Suite 1400
Oakland, CA 94612

Office of the U.S. Trustee
250 Montgomery Street,
Suite 1000
San Francisco, CA 94104-3401

Region IV
U.S. Nuclear Regulatory
Commission
Ellis W. Mershoff
Regional Administrator
611 Ryan Plaza Drive, Suite 400
Arlington, TX 76011-8064

Mike R. Jaske
California Energy Commission
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Mr. David Boergers, Secretary
Federal Energy Regulatory
Commission
888 First Street, N.E., Room 1-A
Washington, DC 20246

State of California
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c/o Chief - Energy Division
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Securities Exchange Commission
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State of California
Office of the Attorney General
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Sacramento, CA 94244-2550

U.S. Nuclear Regulatory
Commission
Attn: Document Control Desk
Washington, CA 20555-0001

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Sacramento, CA 94257-2021

California Independent System
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Folsom, CA 95630

Norma Formanek
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[Attorney for California
Independent System Operator]

Banks / Financial Institutions

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San Francisco, CA 94104-1502

Bank of America National Trust
and Savings Association
CA5-705-12-10
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San Francisco, CA 94104

Bank of America National Trust
and Savings Association
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1850 Gateway Boulevard
Concord, CA 94520

Bank of America
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Mail Code CA9-706-11-21
Los Angeles, CA 90071

Bank One, NA
Attn: Robert G. Bussa, Jane Bek
Energy & Utilities
Mail Code IL 1-0363
Bank One Plaza
Chicago, IL 60670

Banque Nationale de Paris
San Francisco Branch
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San Francisco, CA 94104

BMO Nesbitt Burns
Attn: John Harche
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Houston, TX 77002

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New York Branch
Attn: E.S. Medla
31 West 52nd Street
New York, NY 10019

Deutsche Bank AG
New York Branch
Attn: John Quinn
31 West 52nd Street
New York, NY 10019

The Fuji Bank, Limited
Attn: Jonathan Bigelow
333 So. Hope Street, 39th Floor
Los Angeles, CA 90071

KBC Bank
Attn: Daniel To
515 So. Figueroa St., Suite 1920
Los Angeles, CA 90071

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113 King Street
Armonk, NY 10504

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400 So. Hope Street, 5th Floor
Los Angeles, CA 90071-2806

Merrill Lynch
Attn: Ahi Aharon
World Financial Ctr.,
North Tower
250 Vesey Street, 10th Floor
New York, NY 10281-1310

Morgan Guaranty Trust Company
of New York
Attn: Carl J. Mehldau
60 Wall Street
New York, NY 10260

Rabobank Nederland
New York Branch
Attn: International Trade
Services
245 Park Avenue
New York, NY 10167-0062

Rabobank Nederland
Attn: Tamira Treffers-Herrera
Three Embarcadero Center
Suite 930
San Francisco, CA 94111

The Sumitomo Bank Ltd.
Attn: Al Galluzzo
777 S. Figueroa St., Suite 2600
Los Angeles, CA 90017-3138

The Toronto Dominion Bank
Attn: F.B. Hawley
909 Fannin, Suite 1700
Houston, TX 77010

Union Bank of Switzerland
New York Branch
Attn: Paul Morrison
299 Park Avenue
New York, NY 10171

Indenture Trustee

Bankers Trust Company
Corporate Trust Services
Attn: Safet Kalabovic
4 Albany Street, 4th Floor
New York, NY 10006

Bankers Trust Co. of California,
NA
Structured Finance Group
Attn: Peter Becker
4 Albany St., 10th Floor
New York, NY 10006

The Bank of New York
Attn: Michael Pittflick, Corp.
Trust Administration
101 Barclay Street-21W
New York, NY 10286

Bank One
Corporate Trust Administration
Attn: Janice Ott Rotunno
Mail Code IL 1-0126
1 Bank One Plaza
Chicago, IL 60670-0126

U.S. Bank
Corporate Trust Services
Attn: LaDonna Morrison
180 East Fifth St., 3rd Floor
St. Paul, MN 55170

Secured Creditors

Gas Suppliers

BP Energy Company 501 Westlake Park Boulevard Houston, TX 77079 Attn: Ken McClanahan	Dynergy Canada Marketing & Trade 350 - 7 th Avenue S.W. Calgary, Alberta Canada, T2P 3N9 Attn: Steve Barron	Coast Energy Canada Inc. 444-7th Avenue S.W., Suite 700 Calgary, Alberta Canada T2P 0X8 Attn: Caroline Pitre
Coast Energy Group, A Division of Cornerstone Propane, L.P. 1600 Highway 6, Suite 400 Sugarland, TX 77478 Attn: Ruben Alonso	Cook Inlet Energy Supply 10100 Santa Monica Blvd., 25 th Floor Los Angeles, CA 90067 Attn: Hans O. Saebj	Dynergy Marketing & Trade 1100 Louisiana Street, Suite 5800 Houston, TX 77002 Attn: Steve Barron
El Paso Merchant Energy, L.P. 1010 Travis Street Houston, TX 77002 Attn: John Harrison	Texaco Canada Petroleum, Inc. 2035 400 3 rd Avenue, S.W. Calgary, Alberta Canada T2P 4H2 Attn: Bill Collier	ICC Energy Corporation 302 N. Market Street, Suite 500 Dallas, TX 75202-1846 Attn: Karl Butler
Pancanadian Energy Services, inc. 1200 Smith Street, Suite 900 Houston, TX 77002 Attn: Brian Redd	Southern California Gas Company 555 W. Fifth Street, GT24E1 Los Angeles, CA 90013-1000 Attn: Jim Nakata	Texaco Natural Gas Inc. 1111 Bagby Street Houston, Texas 77002 Attn: Bill Collier
TXU Energy Trading Canada Limited 1717 Main Street Dallas, Texas 75201 Attn: Jeff Shorter	TXU Energy Trading Company 1717 Main Street Dallas, TX 75201 Attn: Jim Macredie	Williams Energy Marketing & Trading Co. One Williams Center, 19 th Floor Department 558 P.O. Box 2848 Tulsa, Oklahoma 74172 Attn: Kelly Knowlton
Williams Energy Marketing & Trading Co. (Canada) One Williams Center, 19 th Floor Department 558 P.O. Box 2848 Tulsa, Oklahoma 74101 Attn: Kelly Knowlton	U.S. Trust Company, National Association One Embarcadero Center, Suite 2050 San Francisco, CA 94111-3709 Attn: Josephine Libunao	

Indenture Trustee for Mortgage Bonds

BNY Western Trust Company
Attn: Rose Ruelos, Corp. Trust
Administration
550 Kearney St., Suite 600
San Francisco, CA 94108-2527

White & Case, LLP
Attn: Neil Millard
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Los Angeles, CA 90071-2007
(Attorney for BNY Western Trust
Co.)