

CORPORATE COUNSEL LAW GROUP, LLP
JOHN CHU (#104302)
417 Montgomery St., 10th Fl.
San Francisco, CA 94104
Telephone 415-989-5300
Fax 415-788-4315

50-295/323

Attorneys For Unsecured Creditor
and Party-In-Interest
San Francisco Bay Area Rapid Transit District

UNITED STATES BANKRUPTCY COURT

NORTHERN DISTRICT OF CALIFORNIA--SAN FRANCISCO DIVISION

In re)	No. 01-30923-DM-11
)	
PACIFIC GAS AND ELECTRIC)	Chapter 11
COMPANY, a California)	
corporation,)	NOTICE OF MOTION AND MOTION OF
)	BART FOR ORDER SETTING DEADLINE
Debtor.)	FOR DEBTOR'S ASSUMPTION OR
)	REJECTION OF EXECUTORY
FTI: 94-0742640)	CONTRACTS

Date: 8/30/01
Time: 10:00 a.m.

To the debtor-in-possession, debtor-in-possession's counsel,
the United States Trustee and other parties in interest:

Please take notice that at 10:00 a.m. on August 30, 2001 or
as soon thereafter as the matter may be heard, the Bankruptcy
Court, in the courtroom of the Hon. Dennis Montali at 235 Pine
Street, 22nd Floor, San Francisco, CA 94104, will hear the motion
of interest party San Francisco Bay Area Rapid Transit District
("BART") for an order setting a reasonable deadline for the
debtor to assume or to reject the following pre-petition
executory contracts with BART: 1) the "Agreement Between San

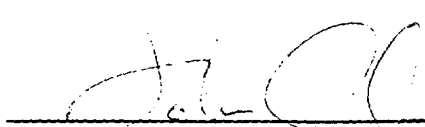
NOTICE OF MOTION AND MOTION OF BART FOR ORDER SETTING DEADLINE
FOR DEBTOR'S ASSUMPTION OR REJECTION OF EXECUTORY CONTRACTS

1001 0/1 Add: Rids Ogc Mail Center

1 Francisco Bay Area Rapid Transit District and Pacific Gas and
2 Electric Company For Specified CPUC Jurisdictional Electrical
3 Services" entered into on or about June 21, 2000, and 2) the
4 related "Agreement for the Deposit and Disbursement of CPUC
5 Jurisdictional Funds" entered into on or about June 7, 2000, and
6 for an order staying the debtor's attempt to enforce the subject
7 contracts against BART pending its assumption, if any, of the
8 subject contracts, or such other relief as the Court may deem
9 appropriate.

10 This motion is made pursuant to 11 U. S. C. §§ 105(a) and
11 365(d)(2), and is based upon the accompanying "Memorandum in
12 Support of Motion of BART for Order Setting Deadline for Debtor's
13 Assumption or Rejection of Executory Contracts," "Declaration of
14 Connee B. Lloyd in Support of Motion of BART for Order Setting
15 Deadline for Debtor's Assumption or Rejection of Executory
16 Contracts," and "Proof of Service By Mail of Notice of Motion and
17 Motion of Bart for Order Setting Deadline for Debtor's Assumption
18 or Rejection of Executory Contracts," and such further evidence
19 and argument as may be presented at the hearing on the motion.
20 Copies of Movant's documents in support of its motion are
21 available upon written request to the undersigned counsel, or by
22 accessing the world wide website established pursuant to order o
23 the Bankruptcy Court at www.pge.com/court_docs.

24
25 Dated: 7/21/01


Corporate Counsel Law Group, LLP
By John Chu
Attorneys For Unsecured Creditor
and Party-In-Interest San Francis
Bay Area Rapid Transit District