

50-295/323

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8 UNITED STATES BANKRUPTCY COURT  
9 NORTHERN DISTRICT OF CALIFORNIA  
10 SAN FRANCISCO DIVISION  
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12 In re  
13 PACIFIC GAS AND ELECTRIC COMPANY, a  
California corporation,  
14 Debtor.  
15 Tax Identification No. 94-742640  
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Case No. 01-30923 DM

Chapter 11

DECLARATION OF BILL T.  
HAMILTON IN SUPPORT OF BRIEF  
OF CREDITOR RELIANT ENERGY  
SERVICES, INC. RE DEBTOR'S  
MOTION FOR ORDER  
ESTABLISHING PROCEDURES AND  
DEADLINES FOR FILING CERTAIN  
ADMINISTRATIVE CLAIMS

Date: August 7, 2001  
Time: 9:30 a.m.  
Place: Courtroom 22  
Judge: Hon. Dennis Montali

A001 Add: Rids Ogc Mail Center

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I, Bill T. Hamilton, declare as follows:

1. I am the Vice-President of Risk Control at Reliant.. I have personal knowledge of the matters stated in this declaration and if called as a witness could testify competently to them.

2. The California Independent System Operator ("ISO") regularly issues invoices and statements for power supplied through the ISO. However, these invoices and statements do not include information about the buyers of the power delivered by each supplier, or to which utility's delivery area the power was supplied. Therefore, Reliant cannot determine from the ISO statements to what extent any particular utility is liable for payment for the power that Reliant supplied.

3. The ISO adjusts metering information and statements or invoices for six months or more after the energy is delivered. Therefore, Reliant could not know with certainty the extent of its accounts receivables for energy sold through the ISO within three months of delivery.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct and that I executed this declaration in Houston, Texas on August 2, 2001.



Bill T. Hamilton