

# STOEL RIVES LLP

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50-275/329

August 16, 2001

RICHARD C. JOSEPHSON  
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## OVERNIGHT MAIL

Office of the Clerk  
United States Bankruptcy Court  
Northern District of California  
235 Pine Street, Nineteenth Floor  
San Francisco, CA 94104

**Re:** *In re Pacific Gas & Electric Company, Debtor*  
United States Bankruptcy Court, Northern District of California  
Case No. 01-30923

Dear Clerk:

Enclosed for filing in this matter are an original and two copies of PacifiCorp's Request for Access by Key Personnel to PX/ISO Documents.

If you have any questions, please call me. Thank you for your assistance.

Very truly yours,



Richard C. Josephson

RCJ:JEH:jlf  
Enclosures

A001 Add: KidsOgc Mail Center

1 RICHARD C. JOSEPHSON, OSB NO. 73374  
(Pro hac vice)  
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Telephone: (503) 224-3380  
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5 Attorneys for PacifiCorp

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9 UNITED STATES BANKRUPTCY COURT  
10 FOR THE NORTHERN DISTRICT OF CALIFORNIA

11 In re

12 PACIFIC GAS & ELECTRIC COMPANY, a  
13 California Corporation,

14 Debtor.

15  
16 FEDERAL I.D. No. 94-0742640

CHAPTER 11

Case No. 01-30923 DM

**PACIFICORP'S REQUEST FOR ACCESS  
BY KEY PERSONNEL TO PX/ISO  
DOCUMENTS**

Date: August 30, 2001

Time: 10:00 a.m.

Place: 235 Pine Street, 22<sup>nd</sup> Floor  
San Francisco, California

Judge: Hon. Dennis Montali

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19 Pursuant to Paragraph 6 of the "Order Directing Production of Documents to ISO/PX  
20 Market Participants Pursuant to Federal Bankruptcy Rule 2004 and Protective Order respecting  
21 Confidentiality of Documents" ("Order"), PacifiCorp hereby requests that the following "Key  
22 Personnel" be provided access to Responsive Information, as that term is defined in the Order:

- 23 1. Name and Position: John Fryer, Manager – Group Credit  
24 Nathalie Wessling, Sr. Credit Analyst  
25 Debra Hudkins, Business Budget Analyst  
26 Lori Wisbeck, Manager – Sales Support  
Patty Simons, Administrator – Sales Support  
John Apperson, Director - Trading  
Stan Watters, VP - Trading and Origination

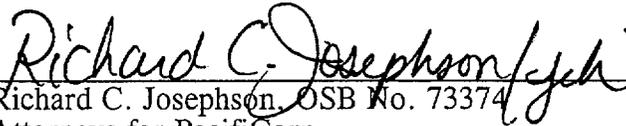
1 Scott Jacobson, Director - Finance Special Projects  
2 Tom Beck, Managing Director - Trading Finance  
3 Merrick Kerr, Division Controller  
4 Pam Simonsen, Business Budget Analyst

5 2. Reason why disclosure is necessary: Mr. Fryer, Ms. Wessling, Ms. Hudkins,  
6 Ms. Wisbeck, Ms. Simons, Mr. Apperson, Mr. Watters, Mr. Jacobson, Mr. Beck, Mr. Kerr  
7 and Ms. Simonsen will review and analyze the material and data to assist in the preparation  
8 and any appropriate amendments to PacifiCorp's proof of claim in this case.

9 3. Measures to be taken to prevent unauthorized disclosure: PacifiCorp will take  
10 steps to maintain the Responsive Documents in a secure location, with access available only to  
11 Mr. Fryer, Ms. Wessling, Ms. Hudkins, Ms. Wisbeck, Ms. Simons, Mr. Apperson,  
12 Mr. Watters, Mr. Jacobson, Mr. Beck, Mr. Kerr and Ms. Simonsen. The documents will be  
13 labeled as confidential. Mr. Fryer, Ms. Wessling, Ms. Hudkins, Ms. Wisbeck, Ms. Simons,  
14 Mr. Apperson, Mr. Watters, Mr. Jacobson, Mr. Beck, Mr. Kerr and Ms. Simonsen will sign a  
15 confidentiality agreement pledging that they will not disseminate or disclose Responsive  
16 Documents to any unauthorized persons in accordance with the provisions of the Order.

17 DATED: August 16, 2001.

18 STOEL RIVES LLP

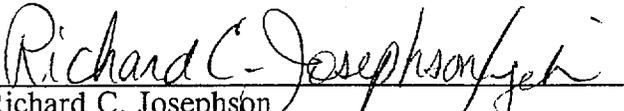
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20 Richard C. Josephson, OSB No. 73374  
21 Attorneys for PacifiCorp

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PROOF OF SERVICE

I hereby certify that I served the foregoing via overnight mail to the Office of the Clerk, United States Bankruptcy Court, 235 Pine Street, Nineteenth Floor, San Francisco, CA 94104 and via first class mail to said persons listed on the attached service list.

DATED: August 16, 2001.

  
Richard C. Josephson  
Of Attorneys for PacifiCorp