

50-275/323

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UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

In re  
PACIFIC GAS AND ELECTRIC  
COMPANY, a California corporation,  
Debtor.  
Tax Identification Number 94-0742640

Case No. 01-30923-DM  
Chapter 11

DECLARATION OF ANJALI SHEFFRIN IN  
SUPPORT OF OPPOSITION OF CALIFORNIA  
ISO TO CERTAIN APPLICATIONS FOR  
DISCLOSURE

Date: August 30, 2001  
Time: 10:00 a.m.  
Place: 235 Pine Street, 22<sup>nd</sup> Floor  
San Francisco, CA  
Judge: Hon. Dennis Montali

I Anjali Sheffrin declare:

1. I am employed by the California Independent System Operator Corporation (the "ISO") as Director of Market Analysis. I received a Ph.D. in Economics from the University of California, Davis, in 1981. My business address is 151 Blue Ravine Road, Folsom, California 95630.

*001 Add: Rds Oge mail Center*


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2. As Director of Market Analysis, I am responsible for developing and managing market monitoring activities for the ISO's deregulated energy markets, ensuring an open and efficient market for energy, ancillary services, and transmission services. My duties include, among other things: (1) analyzing markets and identifying abuses of market power; (2) reviewing market rules and protocols for design flaws, gaming and market power opportunities; (3) implementing corrective actions, which include FERC filings to change market rules for ancillary services and congestion management or requesting authority for any needed mitigation.

3. In response to Requests F and I of the PG&E Rule 2004 Requests, ISO produced as required not only raw data used to analyze potential exercise of market power, but also the methodologies and technical work papers used by the ISO's DMA to monitor these markets as ISO is charged to do under the Tariff. My concern with further of these papers is that it will materially impair my ability and that of the ISO's Department of Market Analysis to continue the market monitoring function because market participants will know the substantive tools and techniques the ISO uses to monitor their actions. It provides the key to market participants as to how they can structure their behavior to circumvent or avoid detection by DMA.

4. I am preparing and will provide to counsel for the ISO a list of the Bates numbers identifying the specific documents and electronic files produced that comprise the above-described materials.

I declare under penalty of perjury that the foregoing is true and correct, and that this Declaration was executed this <sup>24</sup>25th day of August, 2001 at Folsom, California.

  
Anjali Sheffrin