

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

IN RE:

PACIFIC GAS AND ELECTRIC  
COMPANY, a California Corporation

Debtor.

§  
§  
§  
§  
§  
§

CASE NO. 01-30923 DM

**NOTICE OF APPEARANCE AND REQUEST FOR SERVICE OF COPIES**

COMES NOW WORSHAM FORSYTHE WOOLDRIDGE LLP and hereby gives notice of its appearance in this case as counsel for TXU Energy Trading Company, a party-in-interest herein, and requests that all notices given or required to be given in this case and in any cases consolidated herewith, and all papers served or required to be served in this case and in any cases consolidated herewith, be given to and served upon its attorneys-of-record as follows:

Michael P. Massad, Jr.  
Worsham Forsythe Wooldridge LLC  
Energy Plaza, 30<sup>th</sup> Floor  
1601 Bryan Street  
Dallas, Texas 75201  
Telephone: 214.979.3000  
Facsimile: 214.880.0011

Prior to this entry of appearance, mailings and notices were being transmitted to Tom Pounds, 1717 Main Street, 20<sup>th</sup> Floor, Dallas, Texas 75201, and this notice is filed to redirect mailings and notices to the address indicated above.

This request encompasses all notices and pleadings referred to in Section 1109(b) of Title 11 of the United States Code, or in Rules 2002, 3017, 9007 or 9010(b) of the Federal Rules of Bankruptcy Procedure, including, without limitation, notices of any orders, motions, complaints, petitions, pleadings or requests, applications, and any other documents brought before this Court,

NOTICE OF APPEARANCE

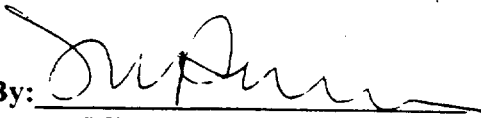
Page 1

*Aool Add: Rids Oge Mail Center*

whether formal or informal, written or oral, or transmitted or conveyed by mail, delivery, telephone, telegraph, telex, or otherwise, which affect or seek to affect the above case.

Respectfully submitted,

WORSHAM FORSYTHE  
WOOLDRIDGE LLP

By: 

Michael P. Massad, Jr.  
Texas Bar No. 13164000  
Steven T. Holmes  
Texas Bar No. 00794918

Energy Plaza, 30th Floor  
1601 Bryan Street  
Dallas, Texas 75201-3402  
214.979.3000  
214.880.0011 (telecopy)

ATTORNEYS FOR TXU ENERGY  
TRADING COMPANY

**CERTIFICATE OF SERVICE**

This is to certify that true and correct copies of the foregoing Notice of Appearance and Request for Service of Copies were served upon the parties listed on the attached service list by United States mail, first-class, postage prepaid, on the 13<sup>th</sup> day of November, 2001.



Michael P. Massad, Jr.

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

California Public Utilities Commission  
Attn: General Counsel  
505 Van Ness Avenue  
San Francisco, CA 94102

Securities Exchange Commission  
Attn: Sandra W. Lavigna  
5670 Wilshire Blvd., 11<sup>th</sup> Floor  
Los Angeles, CA 90036

Joseph A. Eisenberg, Esq.  
Jeffer, Manges, Butler & Marmore  
2121 Avenue of the Stars, 10<sup>th</sup> Floor  
Los Angeles, CA 90067

Louis Renne, City Attorney  
City & County of San Francisco  
City Hall, Room 234  
1 Dr. Carlton B. Goodlett Place  
San Francisco, CA 94102

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

Mr. David Boergers, Secretary  
Federal Energy Regulatory Commission  
888 First Street, N.E., Room 1-A  
Washington, D.C. 20246

California Dept of Water Resources  
c/o Chief - Energy Division  
Attn: Dan Herdocia  
1416 9<sup>th</sup> Street, Room 1640  
Sacramento, CA 95814

U.S. Nuclear Regulatory Comm.  
Attn: Document Control Desk  
Washington, D.C. 20555-0001

Steven H. Felderstein, Esq.

California Independent System Operator  
Attn: William Regan  
4151 Blue Ravine Road  
Folsom, CA 95630

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

California Public Utilities Commission  
Attn: Alan Komberg, Esq.  
Paul, Weiss, Rifkind, Whanon & Garrison  
1285 Avenue of the Americas  
New York, NY 10019-6064

California State Board of Equalization  
P.O. Box 942879  
Sacramento, CA 94279-8063

Fernando De Leon  
Attorney at Law  
California Energy Commission  
1516 9<sup>th</sup> Street, MS-14  
Sacramento, CA 95814

Internal Revenue Service  
Fresno, CA 93888

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

State of California EDD  
P.O. Box 826880  
Sacramento, CA 94280

Securities Exchange Comm.  
Attn: Sandra W. Lavigna  
1416 9<sup>th</sup> Street, Room 1640  
Sacramento, CA 95814

Felderstein, Willoughby & Pascuzzi  
400 Capital Mall, Suite 1450  
Sacramento, CA 95814-4434  
(Attorney for State of California)

Richard Wyron  
Swidler Berlin Sheroff Friedman LLP  
3000 K Street, N.W., Suite 300  
Washington, D.C. 20007

Ben Whitwell  
Whitwell & Ernhoff LLP  
202 N. Canon Drive  
Beverly Hills, CA 90210

Secretary of Treasury  
13<sup>th</sup> & Pennsylvania Avenue  
Washington, D.C. 20549

Department of Justice  
U.S. Attorney's Office  
450 Golden Gate Avenue  
Box 36055  
San Francisco, CA 94102

California Farm Bureau Federation  
2300 River Plaza Drive  
Sacramento, CA 95833

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

Mike R. Jaske  
California Energy Commission  
1516 Ninth Street, MS-22  
Sacramento, CA 95814

State of California  
Office of the Attorney General  
455 Golden Gate Avenue, Suite 11000  
San Francisco, CA 94102-3664

State of California  
Office of the Attorney General  
P.O. Box 94255  
Sacramento, CA 94244-2550

Franchise Tax Board  
P.O. Box 942857  
Sacramento, CA 94257-2021

David Neale  
Lavene Neale Bender Rankin Brill LLP  
1801 Avenue of the Stars, Suite 1120  
Los Angeles, CA 90067

Robert M. Blum  
Thelen Reid & Priest LLP  
101 Second Street, Suite 1800  
San Francisco, CA 94105

Sierra Pacific Industries  
File #51950  
San Francisco, CA 94160

Banque Nationale de Paris

Bank of America Natl Trust & Savings  
CA5-703-12-10  
Attn: Adeline Tourunian  
555 California Street, 12<sup>th</sup> Floor  
San Francisco, CA 94104

BNY Western Trust Company  
Attn: Rose Ruelos, Corporate  
Trust Administration  
550 Kearny Street, Suite 600  
San Francisco, CA 94108-2527

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

Deutsche Bank AG  
New York Branch  
Attn: E. S. Media  
31 West 52<sup>nd</sup> Street  
New York, NY 10019

Mellon Bank, N.A.  
Attn: L. Scott Sommers  
400 So. Hope Street, 5<sup>th</sup> Floor  
Los Angeles, CA 90071-2806

Rabobank Nederland  
New York Branch  
Attn: Internat'l Trade Services  
245 Park Avenue  
New York, NY 10167

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

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

Don Gaffney  
Snell & Wilmer LLP  
One Arizona Center  
400 East Van Buren  
Phoenix, AZ 85004

San Francisco Branch  
Attn: Debra Wright  
180 Montgomery St., 4<sup>th</sup> Floor  
San Francisco, CA 94104

Bank of America National Trust  
and Savings Association  
Attn: Peggie Sanders  
1850 Gateway Blvd.  
Concord, CA 94520

White & Case, LLP  
Attn: Neil Millard  
633 West 5<sup>th</sup> Street, Suite 1900  
Los Angeles, CA 90071-2007

The Bank of New York  
Attn: Michael Pitflick  
Corporate Trust Administration  
101 Barclay Street-21W  
New York, NY 10286

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

Merrill Lynch  
Attn: Ahi Aharon  
Wold Financial Center, North Tower  
250 Vesey Street, 10<sup>th</sup> Floor  
New York, NY 10281-1310

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

Bryan Karkauer, Esq.  
Sidley & Austin  
One First National Plaza  
Chicago, IL 60603

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

Bank of America  
Attn: Clara Strand  
555 South Flower Street  
Mail Code CA9-706-11-21  
Los Angeles, CA 90071

Bank of America  
Administrative Agent  
Attn: Katherine Kemcrait  
555 California Street, 12<sup>th</sup> Floor  
San Francisco, CA 94104-1502

Bank One - Corporate Trust Admin  
Attn: Janice Ou Rotunno  
Mail Code IL1-0126  
1 Bank One Plaza  
Chicago, IL 60670-0126

Bankers Trust Company  
Corporate Trust Services  
Attn: Safet Kalabovic  
Four Albany Street, 4<sup>th</sup> Floor  
New York, NY 10006

BMO Nesbitt Burns  
Attn: John Harche  
700 Louisiana, Suite 4400  
Houston, TX 77002

MBIA Insurance Corporation  
Attn: IPM-PCF  
113 King Street  
Armonk, NY 10504

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

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

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

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

U.S. Trust Company  
National Association  
One Embarcadero Center, Suite 2050  
San Francisco, CA 94111-3709

Coast Energy Canada Inc.  
Attn: Steve Barton  
444 7<sup>th</sup> Avenue, S.W., Suite 700  
Calgary, Alberta  
Canada T2P 0X8

Dynergy Marketing & Trade  
Attn: Hans O. Sacby  
1100 Louisiana St., Suite 5800  
Houston, TX 77002

ICC Energy Corporation  
Attn: Gill Collier  
302 North Market St., Suite 500  
Dallas, TX 75202-1846

Texaco Natural Gas Inc.  
Attn: Jim Nakata  
1111 Bagby Street  
Houston, TX 77002

Williams Energy Mktg & Trdg (Canada)  
Attn: Kelly Knowlton - Department 558  
One Williams Center, 19<sup>th</sup> Floor  
P.O. Box 2848  
Tulsa, OK 74102

Alex Makler  
Calpine Corporation  
1000 Koll Center Parkway, Suite 200  
Beverly Hills, CA 94566

Richard Stevens  
Avista Corp.  
P.O. Box 3727  
Spokane, WA 99220

Akin Gump Strauss Hauer & Feld  
2029 Century Park East, Suite 2600  
Los Angeles, CA 90067  
(Counsel for Creditor, Saiton  
Sea Power Generation)

Bryant Danner  
Southern California Edison  
2244 Walnut Grove Avenue  
Rosemead, CA 91170

BP Energy Company  
Attn: Josephine Libunao  
501 Westlake Park Blvd.  
Houston, TX 77079

Coast Energy Group  
Attn: Caroline Pitra  
1600 Highway 6, Suite 400  
Sugarland, TX 77478

El Faso Merchant Energy LP  
Attn: Steve Barron  
1010 Travis Street  
Houston, TX 77002

Pancanadian Energy Services Inc.  
Attn: Karl Butler  
1200 Smith Street, Suite 900  
Houston, TX 77002

TXU Energy Trading  
Canada Limited  
Attn: Bill Collier  
1717 Main Street  
Dallas, TX 75201

Sempre Energy Trading Corp.  
Attn: Kelly Knowlton  
Tony Ferraijina  
58 Commerce Drive  
Stamford, CT 06902

Adam A. Lewis  
Morrison & Foerster  
425 Market Street, 33<sup>rd</sup> Floor  
San Francisco, CA 94105  
(Counsel for Idaho Power Inc.)

Bruce Bennett, Esq.  
Bennert J. Murphy, Esq.  
Hennigan & Bennett  
601 South Figueroa Street, Suite 3300  
Los Angeles, CA 90017

Chaim J. Fortgaang, Esq.  
Richard G. Mason, Esq.  
Wachtell, Lipton, Rosen & Katz  
51 West 52<sup>nd</sup> Street  
New York, NY 10019

Robert A. Greenfield, Esq.  
Stutman, Treister & Glatt  
3699 Wilshire Blvd., #900  
Los Angeles, CA 90010-2766

Dynergy Canada Marketing & Trade  
Attn: Ken McClanahan  
350 7<sup>th</sup> Avenue, S.W.  
Calgary, Alberta  
Canada. T2P 3N9

Cook Inlet Energy Supply  
Attn: Ruben Alonso  
10100 Santa Monica Blvd., 25<sup>th</sup> Floor  
Los Angeles, CA 90067

Texaco Canada Petroleum Inc.  
Attn: John Harrison  
2035 400 3<sup>rd</sup> Avenue, S.W.  
Calgary, Alberta  
Canada T2P 4H2

Southern California Gas Co.  
Attn: Brian Redd  
555 W. Fifth Street, G124E1  
Los Angeles, CA 90013-1000

Williams Energy Mktg & Trading Co.  
Attn: Jim Macredie - Department 558  
One Williams Center, 19<sup>th</sup> Floor  
P.O. Box 2848  
Tulsa, OK 74102

Richard A. Lapping  
Louis J. Cisz, III  
Thelen Reid & Priest LLP  
101 Second Street, Suite 1800  
San Francisco, CA 94105-3601

James R. Thompson  
Idaho Power Company  
1221 W. Idaho Street  
Boise, Idaho 83702

(Counsel for Sempra)

Peter J. Gurfein  
Jeffrey C. Kraus  
Gregory K. Jones

Thomas B. Walper, Esq.  
Munger Tolles & Olson LLP  
355 South Grand Avenue, Suite 3500  
Los Angeles, CA 90071-1560

David T. Biderman  
Perkins Cole LLP  
1620 26<sup>th</sup> Street, 6<sup>th</sup> Floor  
Santa Monica, CA 90404-4013

James E. Till, Esq.  
Perkins Cole LLP  
1311 S.W. Fifth Avenue, Suite 1500  
Portland, OR 97204

Kenneth N. Russak, Esq.  
Pillsbury Winthrop LLP  
725 S. Figueroa St., Suite 2800  
Los Angeles, CA 90017-5406

Chaim J. Fortgang  
Richard G. Mason  
Wachtell Lipton Rosen & Katz  
51 W. 52<sup>nd</sup> Street  
New York, NY 10019

David A. Gill  
Richard K. Diamond  
Janning Gill Diamond & Kollitz LLP  
2029 Century Park East, 3<sup>rd</sup> Fl.  
Los Angeles, CA 90067

G. Larry Engel/Roberto J. Kampfner  
Brobeck, Phleger & Harrison LLP  
One Market  
Spear Street Tower  
San Francisco, CA 94105

P. Schoenfeld Asset Management, LLC  
Attn: Mitchell A. Harwood/ David Fitton  
1330 Avenue of the Americas, 34th Floor  
New York, NY 10019

Duane H. Nelson  
GWF Power Systems Co., Inc.  
4300 Railroad Ave.  
Pittsburgh, CA 94565-6006

Marc S. Cohen  
Jeffrey A. Krieger  
Greenberg Glusker Fields, et al.  
1900 Avenue of the Stars, Suite 2100  
Los Angeles, CA 90067

Richard W. Esterkin  
Morgan Lewis & Bockius LLP  
300 S. Grand Avenue  
Los Angeles, CA 90071

Patricia S. Mar  
Morrison & Foerster LLP  
425 Market Street, 33<sup>rd</sup> Floor  
San Francisco, CA 94105-2482

Grant Kolling  
City of Palo Alto  
P.O. Box 10250  
Palo Alto, CA 94303

Phillip S. Warden, Esq.  
Pillsbury Winthrop LLP  
50 Fremont Street  
San Francisco, CA 94105

Hydee R. Feldstein/Katherine A. Traxler  
Kelly Aran  
Paul Hastings Janofsky & Walker LLP  
555 S. Flower St., 23<sup>rd</sup> Floor  
Los Angeles, CA 90071

John T. Hansen  
Deborah H. Beck  
Nossaman Guthner Knox & Elliott  
50 California St., 34<sup>th</sup> Floor  
San Francisco, CA 94111

Gordon P. Erspamer  
Morrison & Foerster LLP  
101 Ygnacio Valley Road, Suite 450  
P.O. Box 8130  
Walnut Creek, CA 94595

Steve G. F. Polard  
Perkins, Coie LLP  
1620 26<sup>th</sup> St., 6<sup>th</sup> Floor  
Santa Monica, CA 90404