

50-275/323

1 THOMAS B. WALPER (State Bar No. 096667)  
2 STACIE G. GALLI (State Bar No. 198868)  
3 MUNGER, TOLLES & OLSON LLP  
355 South Grand Avenue, Suite 3500  
4 Los Angeles, CA 90071-1560  
Telephone: (213) 683-9100  
Facsimile: (213) 687-3702

5 BEONG-SOO KIM (State Bar No. 212911)  
6 MUNGER, TOLLES & OLSON LLP  
33 New Montgomery Street, 19th Floor  
7 San Francisco, CA 94105-9781  
Telephone: (415) 512-4000  
8 Facsimile: (415) 512-4077

Attorneys for Southern California Edison Company

10 UNITED STATES BANKRUPTCY COURT  
11 NORTHERN DISTRICT OF CALIFORNIA  
12 SAN FRANCISCO DIVISION

14 In re  
15 PACIFIC GAS AND ELECTRIC  
16 COMPANY, a California corporation,  
17 Debtor.  
18 Federal I.D. No. 94-0742640

Case No. 01 30923 DM

Chapter 11

**NOTICE OF ENTRY OF  
STIPULATION AND ORDER  
REGARDING PX DOCUMENT  
PRODUCTION AND KEY PERSONNEL**

19  
20 PLEASE TAKE NOTICE that the attached Stipulation and Order Regarding PX  
21 Document Production and Key Personnel was signed by the Honorable Dennis Montali on  
22 December 11, 2001, and filed with the above entitled Court on December 12, 2001.

24 DATED: December 28, 2001

MUNGER, TOLLES & OLSON LLP

26 By: Beong Soo Kim (ba)  
BEONG-SOO KIM

27 Attorneys for Southern California Edison  
28 Company

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Chapter 11

**STIPULATION AND ORDER  
REGARDING PX DOCUMENT  
PRODUCTION AND KEY PERSONNEL**

18  
19 This Stipulation and Order Regarding ISO Document Production and Key  
20 Personnel is entered into by and between Southern California Edison Company ("SCE") and the  
21 California Power Exchange Corporation ("PX" and, collectively with SCE, the "Parties").

22 **I.**  
23 **RECITALS**

24 1. On July 11, 2001, the Court entered its Order Directing Production of  
25 Documents to ISO/PX Market Participants Pursuant to Federal Bankruptcy Rule 2004 and  
26 Protective Order Respecting Confidentiality of Documents ("July 11 Order"). All capitalized  
27 terms used but not defined herein shall have the meanings given them in the July 11 Order.

28 2. The July 11 Order sets forth a procedure for Market Participants, including

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U.S. BANKRUPTCY COURT  
NORTHERN DIST. OF CA.  
SAN FRANCISCO, CA.

1 SCE, to follow in order to disclose the Responsive Information to Key Personnel.

2 3. Pursuant to the July 11 order, on August 15, 2001, SCE filed a request  
3 setting forth certain Key Personnel – Barbara Reeves, Douglas Ditonto, Michael Mackness, Julie  
4 Miller, Harold Pope, Bo Drobenko, Gary Stern, Joseph Yan, Phillip Schofield, Mark Reardon,  
5 and Thomas Lepick – whom it wished to have access to the Responsive Information (“Request”).

6 4. On September 20, 2001, SCE filed a supplemental declaration to its  
7 Request. In the supplemental declaration, Barbara Reeves, Assistant General Counsel at SCE,  
8 stated that SCE is not presently engaged in buying or selling in the ISO market, and that none of  
9 the Key Personnel identified in its Request are involved in competitive bidding activities in the  
10 ISO markets for the purchase and sale of wholesale electricity. The supplemental declaration also  
11 identified Stephen Pickett, General Counsel at SCE, as having inadvertently been omitted from  
12 SCE’s Request, and stated that Mr. Pickett is also not involved in competitive bidding activities  
13 in the ISO markets for the purchase and sale of wholesale electricity.

14 5. Barbara Mathews, Assistant General Counsel at SCE, was also  
15 inadvertently omitted from SCE’s Request. Ms. Mathews is not involved in competitive bidding  
16 activities in the ISO markets for the purchase and sale of wholesale electricity.

17 6. On August 30, 2001, the Court held a hearing on SCE’s Request and  
18 similar papers filed by other Market Participants, and, on September 21, 2001, the Court  
19 supplemented its July 11 Order with its Order Re Disclosure Of Documents By Market  
20 Participants To Key Personnel (“September 21 Order”).

21 7. The September 21 Order provides that the Custodian and Outside  
22 Professionals of each Market Participant may disclose to the Market Participant’s Key Personnel  
23 (a) Responsive Information produced in response to PG&E’s Request Nos. A through E, and (b)  
24 Responsive Information produced in response to PG&E’s Request Nos. F through J, subject to  
25 certain limitations. The September 21 Order further provides that such disclosure can only be  
26 made to Key Personnel who are identified by name in papers filed with the Court prior to  
27 September 12, 2001, or who are subsequently authorized to receive Responsive Information by  
28 order of this Court.



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DATED: November 26 2001

MUNGER, TOLLES & OLSON LLP

By: Stacie G. Galli  
STACIE G. GALLI

Attorneys for Southern California Edison  
Company

DATED: November 26 2001

CALIFORNIA POWER EXCHANGE  
CORPORATION

By: Susan D. Rossi  
SUSAN D. ROSSI

Managing Attorney for California Power  
Exchange Corporation

**ORDER**

IT IS SO ORDERED.

DATED: DEC 1 1 2001

DENNIS MONTALI  
THE HONORABLE DENNIS MONTALI