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50-215/623

5 Consultants for the Debtor

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7 **UNITED STATES BANKRUPTCY COURT**
8 **NORTHERN DISTRICT OF CALIFORNIA**
9 **SAN FRANCISCO DIVISION**

10
11 In Re
12 PACIFIC GAS AND ELECTRIC
13 COMPANY, a California corporation,
14 Debtor.

Case No. 01-30923 DM
Chapter 11 Case
(No Hearing Scheduled)

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16 Federal I.D. No. 94-0742640

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18 **THE BRATTLE GROUP INC.'S COVER SHEET APPLICATION**
19 **FOR ALLOWANCE AND PAYMENT OF**
20 **INTERIM COMPENSATION AND REIMBURSEMENT OF EXPENSES**
21 **FOR THE PERIOD OF MARCH 1, 2002 TO MARCH 31, 2002**

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23 The Brattle Group, Inc. (the "Firm") submits its Cover Sheet Application (the
24 "Application") for Allowance and Payment of Interim Compensation and Reimbursement of
25 Expenses for the Period March 1, 2002 through March 31, 2002 (the "Application Period"). In
26 support of the Application, the Firm respectfully represents as follows:

- 27
28 1. The Firm is consultant to the Pacific Gas and Electric Company, debtor and
debtor-in-possession in the above-referenced bankruptcy case ("Debtor"). The

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Firm hereby applies to the Court for allowance and payment of interim compensation for services rendered and reimbursement of expenses incurred during the Application Period.

2. The firm was engaged by the Debtor pursuant to a Retention Agreement dated September 20, 2001¹ to render services relating to the Debtor's Plan of Reorganization. During the Application Period, the Firm billed a total of \$29,192.50 in fees (representing 148 hours expended) and expenses. These fees and expenses break down as follows:

Period	Fees	Expenses	Total
3/1/2002 - 3/31/2002	\$28,977.00	\$215.50	\$29,192.50

3. Accordingly the Firm seeks allowance of interim compensation in the total amount of \$24,845.95 at this time. This total is comprised as follows: \$24,630.45 (85% of the fees for services rendered)² plus \$215.50 (100% of the expenses incurred).

4. On this retention, the Firm has been paid to date as follows:

Application Period	Amount Applied For	Description	Amount Paid
9/20/01 - 9/30/01	\$39,719.68	85% of fees and 100% of expenses	\$39,719.68
10/1/01 - 10/31/01	\$381,566.07	85% of fees and 100% of expenses	\$381,566.07
11/1/01 - 11/31/01	\$199,299.38	85% of fees and 100% of expenses	\$199,299.38
12/1/01 - 12/31/01	\$4,258.46	85% of fees and 100% of expenses	\$4,258.46

¹The Retention Agreement was thereafter amended by letter agreement to provide for a calendar year 2002 maximum budget and to add additional consultants to the engagement.

²Payment of this amount would result in a "holdback" of \$4,346.55.

1/1/02 - 1/31/02	\$8,864.88	85% of fees and 100% of expenses	\$8,864.88
2/1/02 - 2/28/02 ³	\$23,817.14	85% of fees and 100% of expenses	\$0.00
TOTAL	\$661,572.76	TOTAL	\$633,708.47

5. To date the Firm is owed as follows (excluding amounts owed pursuant to this Application).

Application Period	Amount	Description
9/20/01 - 9/30/01	\$6,826.69	15% fee holdback
10/1/01 - 10/31/01	\$62,855.06	15% fee holdback
11/1/01 - 11/31/01	\$33,303.38	15% fee holdback
12/1/01 - 12/31/01	\$600.94	15% fee holdback
1/1/02 - 1/31/02	\$1,477.31	15% fee holdback
2/1/02 - 2/28/02	\$27,864.29	100% fees and expenses

6. With regard to the copies of this Application served on counsel for the Committee, counsel for the Debtor and the Office of the United States Trustee, attached as Exhibit 1 hereto is the name of each professional who performed services in connection with this case during the period covered by this Application and the hourly rate for each such professional; and (b) attached as Exhibits 2-1 and 2-2 are the detailed time and expense statements for the Application Period that comply with all Northern District of California Bankruptcy Local Rules and Compensation Guidelines and the Guidelines of the Office of the United States Trustee.

7. The Firm has served a copy of this Application (without Exhibits) on the Special

³ A revised February 2002 Cover Sheet Application has been filed to correct an error in the amount requested by the original February 2002 Cover Sheet Application.

1 Notice List in this case.

- 2 8. Pursuant to this Court's 'SECOND AMENDED ORDER ESTABLISHING
3 INTERIM FEE APPLICATION AND EXPENSE REIMBURSEMENT
4 PROCEDURE" dated February 24, 2002, the Debtor is authorized to make the
5 payment requested herein without a further hearing or order of this Court unless
6 an objection to this Application is filed with the court by the Debtor, the
7 Committee, or this United States Trustee and served by the fifteenth day of the
8 month following the service of this Application. If such an objection is filed,
9 Debtor is authorized to pay the amounts, if any, not subject to the objection. The
10 Firm is informed and believes that this Cover Sheet application was mailed by
11 first class mail, postage prepaid, on or about April 24, 2002.
- 12 9. The interim compensation and reimbursement of expenses sought in this
13 Application is on account and is not final. Upon conclusion of this case, the Firm
14 will seek fees and reimbursement of the expenses incurred for the totality of the
15 services rendered in the case. Any interim fees or reimbursement of expenses
16 approved by this Court and received by the Firm will be credited against such
17 final fees and expenses as may be allowed by this Court.
- 18 10. The Firm represents and warrants that its billing practices comply with all
19 Northern District of California Bankruptcy Local Rules and Compensation
20 Guidelines and the Guidelines of the Office of the United States Trustee. Neither
21 the Firm nor any members of the Firm has any agreement or understanding of any
22 kind or nature to divide, pay over, or share any portion of the fees or expenses to
23 be awarded to the Firm with any other person or attorney except as among the
24 members and associates of the Firm.

25 WHEREFORE, the Firm respectfully requests that the Debtor pay compensation to the
26 Firm as requested herein pursuant to and in accordance with the terms of the 'SECOND
27 AMENDED ORDER ESTABLISHING INTERIM FEE APPLICATION AND EXPENSE
28 REIMBURSEMENT PROCEDURE."

1 Dated: *April 24, 2002*
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The Brattle Group, Inc.

4 By: *Barbara J. Levine*
5 Barbara J. Levine, General Counsel
6 Consultants to Pacific Gas & Electric Co.
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