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50-215/323

5 Attorneys for
DEUTSCHE BANK TRUST COMPANY AMERICAS,
6 SATELLITE SENIOR INCOME FUND,
SATELLITE SENIOR INCOME FUND II,
7 BP CANADA ENERGY COMPANY, and
JPMORGAN CHASE BANK

8
9 UNITED STATES BANKRUPTCY COURT
10 NORTHERN DISTRICT OF CALIFORNIA
11 SAN FRANCISCO DIVISION

13 In re:
14 PACIFIC GAS AND ELECTRIC
COMPANY, a California corporation,
15 Debtor.

Case No. 01-30923-DM
Chapter 11
BANKRUPTCY RULE 2019 STATEMENT OF
KELLEY DRYE & WARREN LLP
[No Hearing Required]

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19 TO THE CLERK OF THE BANKRUPTCY COURT AND TO ALL PARTIES IN INTEREST.

20 In accordance with Rule 2019(a) of the Federal Rules of Bankruptcy Procedure, Kelley
21 Drye & Warren LLP ("KDW"), as counsel to the parties designated herein in the above chapter
22 11 case, submits this verified statement and states as following:

23 1. Names and Addresses of the Parties Represented by KDW

24 KDW has been employed to represent the following creditors in this case: (i) JPMorgan
25 Chase Bank ("*JPMorgan*"), 270 Park Avenue, New York, New York, 10017; (ii) Satellite Senior
26 Income Fund and Satellite Income Fund II (together, "*Satellite*"), 623 Fifth Avenue, 20th Floor,

27 ^{1/} Admitted *pro hac vice*.

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BANKRUPTCY RULE 2019 STATEMENT OF KELLEY DRYE & WARREN LLP

1 New York, New York, 10022; (iii) Deutsche Bank Trust Company Americas ("*Deutsche*"), 90
2 Hudson Street, MS JCY05-05211, Jersey City, New Jersey, 07302; and (iv) BP Canada Energy
3 Company ("*BP*") 240 4th Avenue S.W., P.O. Box 200, Calgary, Alberta, T2P, 2H8 in the
4 captioned chapter 11 case of Pacific Gas & Electric Company (the "*Debtor*").

5 2. The Nature and Amount of the Claims and the Time of Acquisition

6 Deutsche, as successor administrative agent, has claims against the Debtor, including, but
7 not limited to, for sums due and owing under that certain reimbursement agreement dated May 1,
8 1996 (the "*Rabobank Reimbursement Agreement*"). In addition to being the successor
9 administrative agent, Deutsche is also a beneficial interest holder pursuant to the Rabobank
10 Reimbursement Agreement and a holder of other claims based on similar reimbursement
11 agreements by and between the Debtor and various entities. Upon information and belief,
12 Deutsche, in its individual capacity and not as agent, has filed an unsecured claim in the amount
13 of \$15,000,000 in the above captioned case.

14 Satellite, as beneficial interest holders, has claims against the Debtor, including, but not
15 limited to, for sums due and owing under the Rabobank Reimbursement Agreement. Upon
16 information and belief, Satellite's claims have been preserved by an unsecured claim that was
17 filed by the administrative agent, successor administrative agent or another party related to
18 Satellite in connection with the Rabobank Reimbursement Agreement.

19 BP, as successor-in-interest, has claims against the Debtor, including, but not limited to,
20 for sums due and owing under that certain Master Gas Purchase and Sales Agreement dated on
21 or about November 1, 1995, as amended by the Confirmation and Amendment to Gas Supply
22 Agreement dated on or about March 28, 2001, entered into among the Debtor and Amoco Canada
23 Petroleum Company Ltd., the predecessor-in-interest to BP. BP has filed an unsecured claim in
24 the amount of \$796,392.91 in the above captioned case.

25 JPMorgan is a general unsecured creditor and a member of the Official Creditors'
26 Committee of Pacific Gas and Electric Company (the "*Committee*"). KDW has and continues to
27 serve as outside counsel to JPMorgan in connection with its participation on the Committee.

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BANKRUPTCY RULE 2019 STATEMENT OF KELLEY DRYE & WARREN LLP

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3. Amount of Claims Owned by KDW

KDW does not hold any claims against or hold any interest in the Debtor.

I, Eric R. Wilson, declare under penalty of perjury under the laws of the United States of America that I have read the foregoing statement and that it is true and correct to the best of my knowledge, information and belief.

DATED: July 22, 2002

KELLEY DRYE & WARREN
ROBERT C. SHENFELD
ERIC R. WILSON

By: 
ERIC R. WILSON

Attorneys for
Deutsche Bank Trust Company Americas,
Satellite Senior Income Fund,
Satellite Senior Income Fund II,
BP Canada Energy Company, and
JPMorgan Chase Bank