

1 JEFFREY L. SCHAFFER (No. 91404)  
2 ETHAN P. SCHULMAN (No. 112466)  
3 LINDA O. FOY (No. 148764)  
4 HOWARD, RICE, NEMEROVSKI, CANADY,  
5 FALK & RABKIN  
6 A Professional Corporation  
7 Three Embarcadero Center, 7th Floor  
8 San Francisco, California 94111-4065  
9 Telephone: 415/434-1600  
10 Facsimile: 415/217-5910

50-275  
323

11 Attorneys for Debtor and Debtor in Possession  
12 PACIFIC GAS AND ELECTRIC COMPANY

13 UNITED STATES BANKRUPTCY COURT  
14 NORTHERN DISTRICT OF CALIFORNIA  
15 SAN FRANCISCO DIVISION

16 In re  
17 PACIFIC GAS and ELECTRIC  
18 COMPANY, a California corporation,  
19 Debtor.

HOWARD  
RICE  
NEMEROVSKI  
CANADY  
FALK  
& RABKIN  
A Professional Corporation

20 Federal I.D. No. 94-0742640

Case No. 01-30923 DM

Chapter 11 Case

DECLARATION OF DEBORAH S.  
SHEFLER IN SUPPORT OF DEBTOR'S  
VALUATION OF CLAIM FOR  
FEASIBILITY PURPOSES (DOUGLAS  
RAYMOND NELSON, dba APPEX  
TROUBLESHOOTING & TESTING  
ENGINEERS, LTD. CLAIM NO. 7125)

Date: October 2, 2002  
Time: 1:30 p.m.  
Place: 235 Pine Street, 22nd Floor  
San Francisco, California  
Judge: Hon. Dennis Montali

Add OGC Mail Center  
A001

HOWARD  
RICE  
NEMEROVSKI  
CANADY  
FALK  
& RABKIN  
A Professional Corporation

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

I, Deborah S. Shefler, hereby declare:

1. I am an attorney licensed to practice before this Court. I am employed by Pacific Gas & Electric Company ("PG&E") in its in-house counsel office and am one of the attorneys representing PG&E with respect to the Proof of Claim filed by Douglas Raymond Nelson dba Apex Troubleshooters & Testing Engineers, Ltd. ("Nelson"). The documents attached as exhibits to this declaration are maintained in the normal course of business by PG&E. I have personal knowledge of the matters set forth in this declaration and if called upon to testify thereto I could and would competently do so.

2. Attached as Exhibit A is a true and correct copy of the Proof of Claim No. 7125 (the "Nelson Claim"), filed by Douglas Raymond Nelson DBA AT&Te, Apex Troubleshooters & Testing Engineers, Inc., on or about August 24, 2001, in PG&E's bankruptcy proceeding, Chapter 11 Case No. 01-30923DM.

3. Attached as Exhibit B is a true and correct copy of a document attached as Exhibit 1 to the Nelson Claim. This document is the only material Nelson submitted in support of the Nelson Claim. The copy of Exhibit 1 to the Nelson Claim received by PG&E was obscured by an overlaid copy of a "Notice of Special Disposition-Inmate Mail," as it appears in Exhibit B.

4. According to PG&E's records, a Douglas Raymond Nelson, who gave his home address as 2830 Emerald Drive, Walnut Creek, California, worked as an electrician for PG&E; his employment ended July 28, 1983. PG&E has found no record of any subsequent re-employment of Mr. Nelson by PG&E.

5. Based upon the information contained in the Nelson Claim, PG&E has been unable to confirm the existence of any business relationship at any time with Mr. Nelson's business entity, AT&Te, Apex Troubleshooters & Testing Engineers, Ltd.

6. Based upon the information contained in the Nelson Claim, PG&E has been unable to identify any complaint or charge filed against it by Mr. Nelson, including any claim under 209 U.S.C. §660, 5 U.S.C. §2302 or Labor Code §1102.

I declare under penalty of perjury under the laws of the State of California that

DEC. OF D. SHEFLER ISO DEBTOR'S VALUATION OF CLAIM (CLAIM NO. 7125)

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

the statements in this declaration are true and correct. Executed on this 20 day of August,  
at San Francisco, California.

By:   
DEBORAH S. SHEFLER

HOWARD  
RICE  
NEMEROVSKI  
CANADY  
BALK  
& RABKIN  
A Professional Corporation

Exhibits are not attached to the service copies of this document. You may obtain copies of the Exhibits in one of the following ways: through the "Pacific Gas & Electric Company Chapter 11 Case" link accessible through the Bankruptcy Court's website ([www.canb.uscourts.gov](http://www.canb.uscourts.gov)), or by written request to Howard, Rice, Nemerovski, Canady, Falk & Rabkin, Attn: Nathaniel H. Hunt, Three Embarcadero Center, 7th Floor, San Francisco, California 94111-4024.