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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.

20 Case No. 01-30923 DM

21 Chapter 11 Case

22 Date: November 8, 2002

23 Time: 1:30 p.m.

24 Place: 235 Pine Street, 22nd Floor
25 San Francisco, California

26 Federal I.D. No. 94-0742640

27 **DECLARATION OF LANCE MAEDA IN SUPPORT OF**
28 **THIRD MOTION FOR AUTHORITY TO INCUR**
MISCELLANEOUS IMPLEMENTATION EXPENSES

DECLARATION OF LANCE MAEDA

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HOWARD
RICE
NEMEROVSKI
CANADY
FALK
& RABKIN
A Professional Corporation

1 I, Lance Maeda, declare:

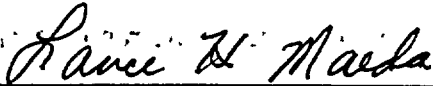
2 1. I am employed by Pacific Gas and Electric Company ("PG&E"); the debtor
3 and debtor-in-possession in this Chapter 11 case. I have been employed by PG&E since
4 1996 and hold the position of Director of Application Development & Support. In this
5 position, I am responsible for technical oversight of information technology ("IT") software
6 projects within PG&E's Information Systems and Technical Services Organization; I also
7 have company-wide responsibilities in the IT area, including responsibility for creating and
8 implementing plans, policies and procedures for PG&E's IT software activities and for
9 supervising employees engaged in systems development and support functions. In
10 connection with implementation of PG&E's proposed Plan of Reorganization (as amended
11 from time to time, the "Plan"), my specific responsibilities include: identification of
12 applications that will be needed by the New Entities, integrated testing of applications
13 migrating from PG&E to the New Entities, and defining security strategies for applications
14 to be used by the New Entities.

15 2. This declaration is submitted in support of PG&E's Third Motion for
16 Authority to Incur Miscellaneous Implementation Expenses (the "Motion"). Defined terms
17 used herein shall have the meanings set forth in the Motion. I make this declaration based
18 on personal knowledge, except where otherwise indicated, and if called as a witness, could
19 and would testify competently to the matters set forth herein.

20 3. PG&E currently uses an Interactive Voice Response ("IVR") system for
21 accounts payable functions, the FirstLine Encore IVR system, provided by EPOS
22 Corporation. This system allows vendors and employees to access their invoice and
23 payment information through a series of interactive menus by using their touch-tone phones.
24 PG&E believes it is necessary to have the IVR system available to vendors and employees
25 of the New Entities by the Effective Date under the Plan to allow for a smooth transition and
26 to minimize confusion for vendors and employees who are accustomed to using the IVR
27 system. EPOS Corporation will provide the necessary hardware, software, installation and
28 training in connection with the FirstLine Encore IVR system for the New Entities at a cost of

1 approximately \$58,000. This work will not commence until immediately after Plan
2 confirmation, as PG&E believes it can be completed during the period between confirmation
3 and the Effective Date under the Plan.

4 I declare under penalty of perjury of the laws of the United States that the
5 foregoing is true and correct, and that this declaration was executed at San Francisco,
6 California on October 18, 2002.

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8 LANCE MAEDA

9 WP 101702/1-1419905/1030559/v1

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