

50-275/323

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PACIFIC GAS AND ELECTRIC COMPANY

UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

In re

PACIFIC GAS AND ELECTRIC  
COMPANY, a California corporation,

Debtor.

Federal I.D. No. 94-0742640

Case No. 01-30923 DM

Chapter 11

HEARING

Date: May 9, 2001

Time: 9:30 a.m.

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

NOTICE OF DEBTOR'S MOTION AND MOTION FOR ORDER  
APPROVING STIPULATION: (I) AUTHORIZING USE OF CASH  
COLLATERAL PURSUANT TO 11 U.S.C. § 363 AND BANKRUPTCY  
RULE 4001 AND (II) GRANTING ADEQUATE PROTECTION  
PURSUANT TO 11 U.S.C. §§ 361 AND 363

[SUPPORTING MEMORANDUM OF POINTS AND AUTHORITIES AND  
DECLARATION OF KENT HARVEY FILED HERewith]

PLEASE TAKE NOTICE that on May 9, 2001, at 9:30 a.m., or as soon thereafter as  
the matter may be heard, in the Courtroom of the Honorable Dennis Montali, located at 235  
Pine Street, 22nd Floor, San Francisco, California, Pacific Gas and Electric Company, the  
debtor and debtor in possession in the above-captioned Chapter 11 case (the "Debtor" or  
"PG&E"), will and hereby does move the Court (the "Motion") for entry of an order

MOTION FOR APPROVAL OF STIPULATION RE USE OF BONDHOLDERS' CASH COLLATERAL

Appl of

1 approving a proposed Stipulation: (I) Authorizing and Restricting Use of Cash Collateral  
2 Pursuant to 11 U.S.C. § 363 and Bankruptcy Rule 4001 and (II) Granting Adequate  
3 Protection Pursuant to 11 U.S.C. §§ 361 and 363 (the "Stipulation"). By this Motion, PG&E  
4 seeks approval from the Court to enter into and perform its obligations under the Stipulation  
5 with BNY Western Trust Company, as successor trustee pursuant to a certain indenture with  
6 respect to certain mortgage bonds issued by PG&E.

7 The Motion is based on this Notice of Motion and Motion, the supporting  
8 Memorandum of Points and Authorities and Declaration of Kent Harvey submitted herewith,  
9 the record of this case and any admissible evidence presented to the Court at or prior to the  
10 hearing on this Motion.

11 **PLEASE TAKE FURTHER NOTICE** that pursuant to the Court's April 9, 2001  
12 Order on Emergency Motion For Orders: (1) Authorizing Interim Use Of Cash Collateral In  
13 Which Mortgage Bondholders Have A Beneficial Interest; (2) Scheduling And Establishing  
14 Deadlines Relating To A Final Hearing On Continued Use Of Cash Collateral; and (3) After  
15 Conclusion Of A Final Hearing, Authorizing Continued Use Of Cash Collateral, any  
16 opposition to the Motion must be filed with the Bankruptcy Court and served upon  
17 appropriate parties (including counsel for the Debtor) no later by May 4, 2001.

18 DATED: April 20, 2001

19 Respectfully,

20 HOWARD, RICE, NEMEROVSKI, CANADY,  
21 FALK & RABKIN  
22 A Professional Corporation

23 By:   
for JAMES L. LOPES

24 Attorneys for Debtor and Debtor in Possession  
25 PACIFIC GAS AND ELECTRIC COMPANY

26 WD 042001/1-1419910/912238/v1  
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