



*Steven T. Holmes*

*Direct Dial: 214.979.3051*

*Email: sholmes@worsham.net*

April 26, 2001

Clerk, U.S. Bankruptcy Court  
Northern District of California  
San Francisco Division  
235 Pine Street, 19<sup>th</sup> Floor  
San Francisco, California 94104

Re: Pacific Gas and Electric Company, Case No. 01-30923SFM11; United States  
Bankruptcy Court, Northern District of California, San Francisco Division

Dear Sir or Madam:

Enclosed please find an original and three copies of a Notice of Appearance in the Pacific Gas and Electric bankruptcy case. Please file in your customary manner, returning one copy to the undersigned in the enclosed, self-addressed, postage prepaid envelope which has been provided for convenience.

Very truly yours,

A handwritten signature in black ink, appearing to read 'Steven T. Holmes', written over the typed name.

Steven T. Holmes

STH/pkg  
Enclosures

Attorneys and Counselors at Law

Energy Plaza, 30th Floor  
1601 Bryan Street  
Dallas, Texas 75201  
214.979.3000  
214.880.0011 Fax  
www.worsham.net

Other Offices  
Richardson / Telecom Corridor  
Austin

Add: 4001  
Kids Oge Mail Center

Steven T. Holmes  
State Bar No. 00794918  
Craig R. Enochs  
State Bar No. 24002055  
Worsham Forsythe Wooldridge LLP  
Energy Plaza, 30<sup>th</sup> Floor  
1601 Bryan Street  
Dallas, Texas 75201  
214.979.3000  
214.880.0011 (Telecopier)

**ATTORNEYS FOR TXU ENERGY TRADING COMPANY**

**IN THE UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

**IN RE:**

**PACIFIC GAS AND  
ELECTRIC COMPANY,**

**DEBTOR.**

§  
§  
§  
§  
§  
§

**Case No. 01-30923  
Chapter 11**

**NOTICE OF APPEARANCE UNDER BANKRUPTCY RULE 9010(b)  
AND REQUEST FOR COPIES OF ALL PLEADINGS AND OTHER FILINGS  
PURSUANT TO BANKRUPTCY RULES 2002, 3017 AND 9007**

**TO THE HONORABLE UNITED STATES BANKRUPTCY JUDGE:**

**COMES NOW** Worsham Forsythe Wooldridge LLP, and pursuant to Rule 9010 of the Federal Rules of Bankruptcy Procedure, files this Notice of Appearance and Request for Notices on behalf of TXU Energy Trading Company as a creditor and party-in-interest in the referenced bankruptcy proceedings. Worsham Forsythe Wooldridge LLP hereby requests that all notices given or required to be given in this case and all papers served or required to be served in this case and in any cases consolidated with this case, be given and served upon counsel for TXU Energy Services at the following address:

Mr. Steven T. Holmes  
Worsham Forsythe Wooldridge LLP  
Energy Plaza, 30th Floor  
1601 Bryan Street  
Dallas, Texas 75201

This request for notices encompasses all notices, copies and pleadings contemplated by 11 U.S.C. § 1109(b), Rules 2002, 3017, and 9007 of the Federal Rules of Bankruptcy Procedure, including without limitation notices of any orders, motions, demands, complaints, petitions, pleadings, requests, applications, and any other documents brought before the Court in this Chapter 11 proceeding, whether formal or informal, written or oral, or transmitted or conveyed by mail, delivery, telephone, telegraph, telecopy or otherwise, which effects or seeks to effect the above-styled bankruptcy proceeding.

Respectfully submitted this 26<sup>th</sup> day of April 2001.

**WORSHAM FORSYTHE  
WOOLDRIDGE, LLP**

By: 

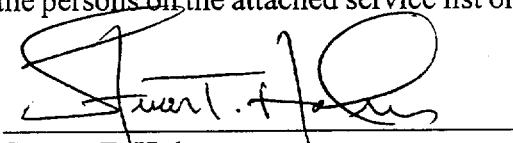
Steven T. Holmes  
State Bar No. 00794918  
Craig R. Enochs  
State Bar No. 24002055

Energy Plaza, 30th Floor  
1601 Bryan Street  
Dallas, Texas 75201  
214.979.3000  
214.880.0011 Fax

**ATTORNEYS FOR TXU ENERGY  
TRADING COMPANY**

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the Foregoing Notice of Appearance and Request for Notices was served by first class mail to the persons on the attached service list on this, the 26<sup>th</sup> day of April 2001.

  
Steven T. Holmes

**SERVICE LIST**  
As of April 19, 2001

California Power Exchange  
Attn: Lynn Miller  
2000 S. Los Robles Avenue  
Suite 400  
Pasadena, CA 91101-2482

California Power Exchange  
Attn: Don Deach  
100 S. Fremont Av., Bldg. A9  
Alhambra, CA 91803-4737

Ben Whitwell  
Whitwell & Ernhoff LLP  
202 N. Canon Drive  
Beverly Hills, CA 90210

California Public Utilities  
Commission  
Attn: General Counsel  
505 Van Ness Avenue  
San Francisco, CA 94102

California Public Utilities  
Commission  
Attn: Alan Kornberg, Esq.  
Paul, Weiss, Rifkind, Whanon  
& Garrison  
1285 Avenue of the Americas  
New York, NY 10019-6064  
(Attorney for California Public  
Utilities Commission)

Secretary of Treasury  
13<sup>th</sup> & Pennsylvania Avenue  
Washington, D.C. 20549

Securities Exchange Comm.  
Attn: Sandra W. Lavigna  
5670 Wilshire Blvd., 11<sup>th</sup> Floor  
Los Angeles, CA 90036

California State Board  
of Equalization  
P.O. Box 942879  
Sacramento, CA 94279-8063

Department of Justice  
U.S. Attorney's Office  
450 Golden Gate Avenue  
Box 36055  
San Francisco, CA 94102

Joseph A. Eisenberg, Esq.  
Jeffer, Mangeis, Butler  
& Marmare  
2121 Avenue of the Stars  
10<sup>th</sup> Floor  
Los Angeles, CA 90067  
(Attorney for California Power  
Exchange)

Fernando De Leon  
Attorney at Law  
California Energy Commission  
1516 9<sup>th</sup> Street, MS-14  
Sacramento, CA 95814

California Farm Bureau  
Federation  
2300 River Plaza Drive  
Sacramento, CA 95833

Louis Renne, City Attorney  
City & County of San Francisco  
City Hall, Room 234  
1 Dr. Carlton B. Goodlett Place  
San Francisco, CA 94102

Internal Revenue Service  
Fresno, CA 93888

Internal Revenue Service  
Spec Proc/Bankruptcy  
1301 Clay Street, Suite 1400  
Oakland, CA 94612

Office of the U.S. Trustee  
250 Montgomery Street  
Suite 1000  
San Francisco, CA 94104-3401

Region IV  
U.S. Nuclear Regulatory Comm.  
Attn: Ellis W. Mershoff  
Regional Administrator  
611 Ryan Plaza Drive, Suite 400  
Arlington, TX 76011-8064

Mike R. Jaske  
California Energy Commission  
1516 Ninth Street, MS-22  
Sacramento, CA 95814

Mr. David Boergers, Secretary  
Federal Energy Regulatory  
Commission  
888 First Street, N.E.  
Room 1-A  
Washington, D.C. 20246

State of California EDD  
P.O. Box 826880  
Sacramento, CA 94280

State of California  
Office of the Attorney General  
455 Golden Gate Avenue  
Suite 11000  
San Francisco, CA 94102-3664

State of California  
Department of Water Resources  
c/o Chief - Energy Division  
Attn: Dan Herdocia  
1416 9<sup>th</sup> Street, Room 1640  
Sacramento, CA 95814

Securities Exchange Comm.  
Attn: Sandra W. Lavigna  
1416 9<sup>th</sup> Street, Room 1640  
Sacramento, CA 95814

State of California  
Office of the Attorney General  
P.O. Box 94255  
Sacramento, CA 94244-2550

U.S. Nuclear Regulatory Comm.  
Attn: Document Control Desk  
Washington, D.C. 20555-0001

Steven H. Felderstein, Esq.  
Felderstein, Willoughby  
& Pascuzzi  
400 Capital Mall, Suite 1450  
Sacramento, CA 95814-4434  
(Attorney for State of  
California)

Franchise Tax Board  
P.O. Box 942857  
Sacramento, CA 94257-2021

California Independent  
System Operator  
Attn: William Regan  
4151 Blue Ravine Road  
Folsom, CA 95630

Richard Wyron  
Swidler Berlin Sheroff  
Friedman LLP  
3000 K Street, N.W., Suite 300  
Washington, D.C. 20007  
(Attorney for California  
Independent System Operator)

David Neale  
Lavene, Neale, Bender, Rankin,  
Brill LLP  
1801 Avenue of the Stars  
Suite 1120  
Los Angeles, CA 90067  
(Attorney for California  
Independent System Operator)

Robert M. Blum  
Thelen Reid & Priest LLP  
101 Second Street, Suite 1800  
San Francisco, CA 94105

Don Gaffney  
Snell & Wilmer LLP  
One Arizona Center  
400 East Van Buren  
Phoenix, AZ 85004  
(Counsel for Arizona Public  
Service)

Bank of America  
Attn: Clara Strand  
555 South Flower Street  
Mail Code CA9-706-11-21  
Los Angeles, CA 90071

Sierra Pacific Industries  
File #51950  
San Francisco, CA 94160

Banque Nationale de Paris  
San Francisco Branch  
Attn: Debra Wright  
180 Montgomery St., 4<sup>th</sup> Floor  
San Francisco, CA 94104

Bank of America  
Administrative Agent  
Attn: Katherine Kemcrait  
Bank of America  
555 California Street, 12<sup>th</sup> Floor  
San Francisco, CA 94104-1502

Bank of America National Trust  
and Savings Association  
CA5-703-12-10  
Attn: Adeline Tourunian  
555 California Street, 12<sup>th</sup> Floor  
San Francisco, CA 94104

Bank of America National Trust  
and Savings Association  
Attn: Peggie Sanders  
1850 Gateway Blvd.  
Concord, CA 94520

Bank One  
Corporate Trust Administration  
Attn: Janice Ou Rotunno  
Mail Code IL1-0126  
1 Bank One Plaza  
Chicago, IL 60670-0126

BNY Western Trust Company  
Attn: Rose Ruelos, Corporate  
Trust Administration  
550 Kearny Street, Suite 600  
San Francisco, CA 94108-2527

White & Case, LLP  
Attn: Neil Millard  
633 West 5<sup>th</sup> Street, Suite 1900  
Los Angeles, CA 90071-2007  
(Attorney for Bank of New  
York)

Bankers Trust Company  
Corporate Trust Services  
Attn: Safet Kalabovic  
4 Albany Street, 4<sup>th</sup> Floor  
New York, NY 10006

Bankers Trust Co. of  
California, N.A.  
Structured Finance Group  
Attn: Peter Becker  
4 Albany Street, 10<sup>th</sup> Floor  
New York, NY 10006

The Bank of New York  
Attn: Michael Pittflick  
Corporate Trust Administration  
101 Barclay Street-21W  
New York, NY 10286

BMO Nesbitt Burns  
Attn: John Harche  
700 Louisiana, Suite 4400  
Houston, TX 77002

Deutsche Bank AG  
New York Branch  
Attn: E. S. Media  
31 West 52<sup>nd</sup> Street  
New York, NY 10019

Deutsche Bank AG  
New York Branch  
Attn: John Quinn  
31 West 52<sup>nd</sup> Street  
New York, NY 10019

MBIA Insurance Corporation  
Attn: IPM-PCF  
113 King Street  
Armonk, NY 10504

Mellon Bank, N.A.  
Attn: L. Scott Sommers  
400 So. Hope Street, 5<sup>th</sup> Floor  
Los Angeles, CA 90071-2806

Merrill Lynch  
Attn: Ahi Aharon  
Wold Financial Center  
North Tower  
250 Vesey Street, 10<sup>th</sup> Floor  
New York, NY 10281-1310

Morgan Guaranty Trust  
Company of New York  
Attn: Carl J. Mchldau  
60 Wall Street  
New York, NY 10260

Rabobank Nederland  
New York Branch  
Attn: Internat'l Trade Services  
245 Park Avenue  
New York, NY 10167

Rabobank Nederland  
Attn: Tamira Treffers-Herrera  
Three Embarcadero Center  
Suite 930  
San Francisco, CA 94111

The Fuji Bank Limited  
Attn: Jonathan Bigelow  
333 So. Hope Street, 39<sup>th</sup> Floor  
Los Angeles, CA 90071

KBC Bank  
Attn: Daniel To  
515 So. Figueroa St., Suite 1920  
Los Angeles, CA 90071

Bryan Karkauer, Esq.  
Sidley & Austin  
One First National Plaza  
Chicago, IL 60603  
(Attorney for Bank of America,  
Administrative Agent)

The Sunitomo Bank Ltd.  
Attn: Al Galluzzo  
777 S. Figueroa St., Suite 2600  
Los Angeles, CA 90017-3138

The Toronto Dominion Bank  
Attn: F. B. Hawley  
909 Fannin, Suite 1700  
Houston, TX 77010

Union Bank of Switzerland  
New York Branch  
Attn: Paul Morrison  
299 Park Avenue  
New York, NY 10171

U.S. Bank  
Corporate Trust Services  
Attn: LaDonna Morrison  
180 East Fifth St., 3<sup>rd</sup> Floor  
St. Paul, MN 55170

U.S. Trust Company, National  
Association  
One Embarcadero Center  
Suite 2050  
San Francisco, CA 94111-3709

BP Energy Company  
Attn: Josephine Libunao  
501 Westlake Park Blvd.  
Houston, TX 77079

Dynergy Canada Marketing  
& Trade  
Attn: Ken McClanahan  
350 7<sup>th</sup> Avenue, S.W.  
Calgary, Alberta  
Canada, T2P 3N9

Coast Energy Canada Inc.  
Attn: Steve Barton  
444 7<sup>th</sup> Avenue, S.W.  
Suite 700  
Calgary, Alberta  
Canada T2P 0X8

Coast Energy Group  
Attn: Caroline Pitra  
1600 Highway 6, Suite 400  
Sugarland, TX 77478

Cook Inlet Energy Supply  
Attn: Ruben Alonso  
10100 Santa Monica Blvd.  
25<sup>th</sup> Floor  
Los Angeles, CA 90067

Dynergy Marketing & Trade  
Attn: Hans O. Sacby  
1100 Louisiana St., Suite 5800  
Houston, TX 77002

El Paso Merchant Energy LP  
Attn: Steve Barron  
1010 Travis Street  
Houston, TX 77002

Texaco Canada Petroleum Inc.  
Attn: John Harrison  
2035 400 3<sup>rd</sup> Avenue, S.W.  
Calgary, Alberta  
Canada T2P 4H2

ICC Energy Corporation  
Attn: Gill Collier  
302 North Market St., Suite 500  
Dallas, TX 75202-1846

Pancanadian Energy  
Services Inc.  
Attn: Karl Butler  
1200 Smith Street, Suite 900  
Houston, TX 77002

Southern California Gas Co.  
Attn: Brian Redd  
555 W. Fifth Street, G124E1  
Los Angeles, CA 90013-1000

Texaco Natural Gas Inc.  
Attn: Jim Nakata  
1111 Bagby Street  
Houston, TX 77002

TXU Energy Trading  
Canada Limited  
Attn: Bill Collier  
1717 Main Street  
Dallas, TX 75201

Williams Energy Marketing &  
Trading Co.  
Attn: Jim Macredie  
One Williams Center, 19<sup>th</sup> Floor  
Department 558  
P.O. Box 2848  
Tulsa, OK 74102

Williams Energy Marketing &  
Trading Co. (Canada)  
Attn: Kelly Knowlton  
One Williams Center, 19<sup>th</sup> Floor  
Department 558  
P.O. Box 2848  
Tulsa, OK 74102

Sempra Energy Trading Corp.  
Attn: Kelly Knowlton  
Tony Ferraijina  
58 Commerce Drive  
Stamford, CT 06902

Richard A. Lapping  
Louis J. Cisz, III  
Thelen Reid & Priest LLP  
101 Second Street, Suite 1800  
San Francisco, CA 94105-3601  
(Counsel for Creditor, Calpine  
Corporation and its Affiliated  
Entities)

Alex Makler  
Calpine Corporation  
6700 Koll Center Parkway  
Suite 200  
Pleasanton, CA 94566

Adam A. Lewis  
Morrison & Foerster  
425 Market Street, 33<sup>rd</sup> Floor  
San Francisco, CA 94105  
(Counsel for Idaho Power Inc.)

James R. Thompson  
Idaho Power Company  
1221 W. Idaho Street  
Boise, Idaho 83702

Richard Stevens  
Avista Corp.  
P.O. Box 3727  
Spokane, WA 99220

Bruce Bennett, Esq.  
Bennett J. Murphy, Esq.  
Hennigan & Bennett  
601 South Figueroa Street  
Suite 3300  
Los Angeles, CA 90017  
(Counsel for Sempra)

Peter J. Gurfein  
Jeffrey C. Kraus  
Gregory K. Jones  
Akin Gump Strauss Hauer  
& Feid  
2029 Century Park East  
Suite 2600  
Los Angeles, CA 90067  
(Counsel for Creditor, Salton  
Sea Power Generation)

Chaim J. Fortgang, Esq.  
Richard G. Mason, Esq.  
Wachtell, Lipton, Rosen & Katz  
51 West 52<sup>nd</sup> Street  
New York, NY 10019  
(Counsel for Unofficial  
Committee of Pacific Gas &  
Electric Company First Mortgage  
Bondholders)

Thomas B. Walper, Esq.  
Munger Tolles & Olson LLP  
355 South Grand Avenue  
Suite 3500  
Los Angeles, CA 90071-1560  
(Counsel for Southern  
California Edison)

Bryant Danner  
Southern California Edison  
2244 Walnut Grove Avenue  
Rosemead, CA 91170

Robert A. Greenfield, Esq.  
Stutman, Treister & Glatt  
3699 Wilshire Blvd., #900  
Los Angeles, CA 90010-2766

David T. Biderman  
Perkins Cole LLP  
1620 26<sup>th</sup> Street, 6<sup>th</sup> Floor  
Santa Monica, CA 90404-4013  
(Counsel for Bank of Montreal)

James E. Till, Esq.  
Perkins Cole LLP  
1311 S.W. Fifth Avenue  
Suite 1500  
Portland, OR 97204  
(Counsel for Bank of Montreal)

Duane H. Nelson  
GWF Power Systems Co., Inc.  
4300 Railroad Ave.  
Pittsburgh, CA 94565-6006

Phillip S. Warden, Esq.  
Pillsbury Winthrop LLP  
50 Fremont Street  
San Francisco, CA 94105  
(Counsel to Parties in Interest:  
Dynergy Power Marketing, Inc.,  
El Segundo Power LLC, Long  
Beach Generation LLC, Cabrillo  
Power I LLC, Cabrillo Power II,  
LLC, Dynergy Marketing &  
Trade LLC and West Coast  
Power LLC)

Kenneth N. Russak, Esq.  
Pillsbury Winthrop LLP  
725 S. Figueroa St., Suite 2800  
Los Angeles, CA 90017-5406  
(Counsel to Parties in Interest:  
Dynergy Power Marketing, Inc.,  
El Segundo Power LLC, Long  
Beach Generation, LLC,  
Cabrillo Power I LLC, Cabrillo  
Power II LLC, Dynergy  
Marketing & Trade LLC and  
West Coast Power LLC)

Marc S. Cohen  
Jeffrey A. Krieger  
Greenberg Glusker Fields, et al.  
1900 Avenue of the Stars  
Suite 2100  
Los Angeles, CA 90067  
(Counsel for Official Committee  
of Participants' Creditors  
Claims)

Hydee R. Feldstein  
Katherine A. Traxler  
Kelly Aran  
Paul, Hastings, Janofsky &  
Walker LLP  
555 S. Flower St., 23<sup>rd</sup> Floor  
Los Angeles, CA 90071  
(Counsel for Constellation  
Power Source, Inc.)

Chaim J. Fortgang  
Richard G. Mason  
Wachtell Lipton Rosen & Katz  
51 W. 52<sup>nd</sup> Street  
New York, NY 10019  
(Counsel for Unofficial  
Committee of PG&E First  
Mortgage Bondholder)

Richard W. Esterkin  
Morgan Lewis & Bockius LLP  
300 S. Grand Avenue  
Los Angeles, CA 90071  
(Counsel for Fuji Bank Ltd.)

John T. Hansen  
Deborah H. Beck  
Nossaman Guthner Knox  
& Elliott  
30 California St., 34<sup>th</sup> Floor  
San Francisco, CA 94111  
(Counsel for Committee of  
PG&E Retirees and Survivors)

David A. Gill  
Richard K. Diamond  
Danning, Gill, Diamond  
& Kollitz LLP  
2029 Century Park East, 3<sup>rd</sup> Fl.  
Los Angeles, CA 90067  
(Counsel for Interested Party:  
Department of Water and Power)

Patricia S. Mar  
Morrison & Foerster LLP  
425 Market Street, 33<sup>rd</sup> Floor  
San Francisco, CA 94105-2482  
(Counsel for AES New Energy,  
Inc., Avista Energy, Inc. and  
GWF Power Systems Company,  
Inc.)

Gordon P. Erspamer  
Morrison & Foerster LLP  
101 Ygnacio Valley Road  
Suite 450  
P.O. Box 8130  
Walnut Creek, CA 94595  
(Counsel for AES New Energy  
Inc.)

G. Larry Engel  
Roberto J. Kampfner  
Brobeck, Phleger &  
Harrison LLP  
OneMarket  
Spear Street Tower  
San Francisco, CA 94105  
(Counsel for City of Palo Alto  
and its municipality utility)

Grant Kolling  
City of Palo Alto  
P.O. Box 10250  
Palo Alto, CA 94303

Steve G. F. Polard  
Perkins, Coie LLP  
1620 26<sup>th</sup> St., 6<sup>th</sup> Floor  
Santa Monica, CA 90404  
(Counsel for Creditor Puget  
Sound Energy, Inc.)