

50-295/323

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9 Attorneys for Southern California Edison Company

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

13  
14 In re

15 PACIFIC GAS AND ELECTRIC  
16 COMPANY, a California corporation,

17 Debtor.

18 Federal I.D. No. 94-0742640

Case No. 01 30923 DM

Chapter 11

**NOTICE OF ENTRY OF  
STIPULATION AND ORDER  
REGARDING ISO DOCUMENT  
PRODUCTION AND KEY PERSONNEL**

19  
20 PLEASE TAKE NOTICE that the attached Stipulation and Order Regarding ISO  
21 Document Production and Key Personnel was signed by the Honorable Dennis Montali and filed  
22 with the above entitled Court on November 30, 2001.

23  
24 DATED: December 28, 2001

MUNGER, TOLLES & OLSON LLP

25  
26 By: Beong Soo Kim (sug)  
BEONG-SOO KIM

27 Attorneys for Southern California Edison  
28 Company

[790282.1]

NOTICE OF ENTRY OF STIP AND ORDER RE ISO DOCUMENT PRODUCTION AND KEY PERSONNEL

1001 Add: Ridge Mtl Center

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UNITED STATES BANKRUPTCY COURT  
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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

**STIPULATION AND ORDER  
REGARDING ISO DOCUMENT  
PRODUCTION AND KEY PERSONNEL**

This Stipulation and Order Regarding ISO Document Production and Key  
Personnel is entered into by and between Southern California Edison Company ("SCE") and the  
California Independent System Operator Corporation ("ISO" and, collectively with SCE, the  
"Parties").

**I.**  
**RECITALS**

1. On July 11, 2001, the Court entered its Order Directing Production of  
Documents to ISO/PX Market Participants Pursuant to Federal Bankruptcy Rule 2004 and  
Protective Order Respecting Confidentiality of Documents ("July 11 Order"). All capitalized  
terms used but not defined herein shall have the meanings given them in the July 11 Order.

[779302.1]

STIPULATION AND ORDER REGARDING ISO DOCUMENTS PRODUCTION AND KEY PERSONNEL

**FILED**

01 NOV 30 PM 1:21

U.S. BANKRUPTCY COURT  
NORTHERN DIST. OF CA.  
SAN FRANCISCO, CA.

1                   2.       The July 11 Order sets forth a procedure for Market Participants, including  
2 SCE, to follow in order to disclose the Responsive Information to Key Personnel.

3                   3.       Pursuant to the July 11 order, on August 15, 2001, SCE filed a request  
4 setting forth certain Key Personnel – Barbara Reeves, Douglas Ditonto, Michael Mackness, Julie  
5 Miller, Harold Pope, Bo Drobenko, Gary Stern, Joseph Yan, Phillip Schofield, Mark Reardon,  
6 and Thomas Lepick – whom it wished to have access to the Responsive Information ("Request").

7                   4.       On September 20, 2001, SCE filed a supplemental declaration to its  
8 Request. In the supplemental declaration, Barbara Reeves, Assistant General Counsel at SCE,  
9 stated that SCE is not presently engaged in buying or selling in the ISO market, and that none of  
10 the Key Personnel identified in its Request are involved in competitive bidding activities in the  
11 ISO markets for the purchase and sale of wholesale electricity. The supplemental declaration also  
12 identified Stephen Pickett, General Counsel at SCE, as having inadvertently been omitted from  
13 SCE's Request, and stated that Mr. Pickett is also not involved in competitive bidding activities  
14 in the ISO markets for the purchase and sale of wholesale electricity.

15                  5.       Barbara Mathews, Assistant General Counsel at SCE, was also  
16 inadvertently omitted from SCE's Request. Ms. Mathews is not involved in competitive bidding  
17 activities in the ISO markets for the purchase and sale of wholesale electricity.

18                  6.       On August 30, 2001, the Court held a hearing on SCE's Request and  
19 similar papers filed by other Market Participants, and, on September 21, 2001, the Court  
20 supplemented its July 11 Order with its Order Re Disclosure Of Documents By Market  
21 Participants To Key Personnel ("September 21 Order").

22                  7.       The September 21 Order provides that the Custodian and Outside  
23 Professionals of each Market Participant may disclose to the Market Participant's Key Personnel  
24 (a) Responsive Information produced in response to PG&E's Request Nos. A through E, and (b)  
25 Responsive Information produced in response to PG&E's Request Nos. F through J, subject to  
26 certain limitations. The September 21 Order further provides that such disclosure can only be  
27 made to Key Personnel who are identified by name in papers filed with the Court prior to  
28

1 September 12, 2001, or who are subsequently authorized to receive Responsive Information by  
2 order of this Court.

3 8. The Parties wish to clarify their agreement with respect to the scope of the  
4 Responsive Information that may be disclosed, and SCE desires, and the ISO has agreed, that  
5 SCE may add Barbara Mathews to the list of Key Personnel that are entitled to receive the  
6 Responsive Information.

7 **II.**  
8 **STIPULATION**

9 Based on the foregoing, the Parties hereby stipulate and agree as follows:

10 1. The Custodian and/or Outside Professionals of SCE may disclose to all  
11 previously-designated Key Personnel (Barbara Reeves, Douglas Ditonto, Michael Mackness,  
12 Julie Miller, Harold Pope, Bo Drobenko, Gary Stern, Joseph Yan, Phillip Schofield, Mark  
13 Reardon, Thomas Lepick, and Stephen Pickett) any and all Responsive Information produced by  
14 the ISO in response to PG&E's Request Nos. A through J, provided that in no event shall such  
15 Custodian and/or Outside Professionals disclose the Responsive Information produced by the ISO  
16 that is numbered CAISO 349-375.

17 2. Barbara Mathews shall be included on the list of Key Personnel that are  
18 authorized to receive the Responsive Information.

19 3. Disclosure of the Responsive Information to Key Personnel shall, other  
20 than as set forth in this Stipulation and Order, be limited by the Court's July 11 Order and  
21 September 21 Order.

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1 DATED: November 21, 2001

MUNGER, TOLLES & OLSON LLP

2  
3 By: 

BEONG-SOO KIM

4  
5 Attorneys for Southern California Edison  
Company

6  
7 DATED: November 20, 2001

FARELLA BRAUN & MARTEL LLP  
NORMA G. FORMANEK

8  
9 By: 

NORMA G. FORMANEK

10  
11 Attorneys for California Independent System  
Operator Corporation

12  
13 **ORDER**

14  
15 IT IS SO ORDERED.

16  
17 DATED: NOV 30 2001

18 DENNIS MONTALI

19 THE HONORABLE DENNIS MONTALI