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Counsel for the Reorganized California  
Power Exchange Corporation

**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. SF 01-30923 DM

) Chapter 11

) [No hearing required]

**NOTICE OF NEW COUNSEL FOR REORGANIZED  
CALIFORNIA POWER EXCHANGE CORPORATION  
AND REQUEST FOR SPECIAL NOTICE**

BKRPO1

1 PLEASE TAKE NOTICE THAT the Chapter 11 plan of California Power Exchange  
2 Corporation became effective on April 1, 2003. The Reorganized California Power Exchange  
3 Corporation ("Reorganized CalPX") has retained Kaye Scholer LLP to be its counsel in this matter.  
4 Kaye Scholer LLP formerly represented the Official Committee of Participant Creditors in California  
5 Power Exchange Corporation's Chapter 11 case.

6 PLEASE TAKE FURTHER NOTICE that the Reorganized CalPX hereby requests,  
7 pursuant to Bankruptcy Rules 2002 and 9007, that special notice of all matters which may come  
8 before the Court concerning the above-captioned Debtor be given to it as follows:

9 Marc S. Cohen, Esq.  
10 Kaye Scholer LLP  
11 1999 Avenue of the Stars, Suite 1700  
12 Los Angeles, CA 90067-6048  
13 Telephone: (310) 788-1000  
14 Facsimile: (310) 788-1200

15 This request includes, without limitation, the notices and papers referred to in Bankruptcy  
16 Rules 2002, 4001, 6004, 6006, 6007, and 9007 and also includes, without limitation, notices of any  
17 orders, applications, complaints, demands, hearings, motions, petitions, pleadings, or requests, and  
18 any other documents brought before the Court in this case, whether formal or informal, whether  
19 written or oral, and whether transmitted or conveyed by mail, delivery, telephone, telegraph, telex, or  
20 otherwise.

21 Neither this request for special notice nor any subsequent appearance, pleading, claim, proof  
22 of claim, document, suit, motion, nor any other writing or conduct, shall constitute a waiver of  
23 Reorganized CalPX's:

- 24 1. Right to have any and all final orders in any and all non-core matters entered only  
25 after *de novo* review by a United States District Court Judge;
- 26 2. Right to a trial by jury in any proceeding as to any and all matters so triable herein,  
27 whether the same be designated legal or private rights, or in any case, controversy or proceeding  
28 related hereto, notwithstanding the designation of such matter as a "core proceeding" pursuant to  
29 U.S.C. §157(b)(2), and whether such jury trial right is pursuant to statute or the United States

1 Constitution;  
2 3. Right to have the reference of this matter withdrawn by the United States District  
3 Court in any matter or proceeding subject to mandatory or discretionary withdrawal; and  
4 4. Other rights, claims, actions, defenses, setoffs, recoupments or other matters to which  
5 Reorganized CalPX is entitled under any agreement or at law or in equity or under the United States  
6 Constitution.

7 All of the above rights are expressly reserved and preserved without exception and with no  
8 purpose of confessing or conceding jurisdiction in any way by this filing or by any other  
9 participation in these matters.

11 DATED: May 23, 2003

KAYE SCHOLER LLP  
MARC S. COHEN  
RONALD L. LEIBOW  
STEVEN F. WERTH

14 By: Steven F. Werth  
15 Steven F. Werth  
16 Counsel for the Reorganized California Power  
Exchange Corporation