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10
11 UNITED STATES BANKRUPTCY COURT
12 NORTHERN DISTRICT OF CALIFORNIA
(San Francisco Division)

13 In re

14 PACIFIC GAS AND ELECTRIC
COMPANY, a California corporation.

Case No. 01-30923 DM

Chapter 11

15 Debtor.

16 Federal I.D. No. 94-0742640
17

18 RESPONSE OF TURN IN SUPPORT OF
19 MOTION OF THE CITY AND COUNTY
20 OF SAN FRANCISCO TO LIFT OR
21 MODIFY JUNE 19, 2003 ORDER

Hearing Date: August 11, 2003

Time: 11:00 a.m.

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

[The Honorable Dennis Montali Presiding]

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23 The Utility Reform Network ("TURN") hereby files this response in support of the
24 Motion of the City and County of San Francisco ("San Francisco") for an Order lifting or
25 modifying the Court's June 19, 2003 Order governing the disclosure of certain materials and
26 information exchanged during the Court-initiated settlement process. If not lifted or modified,
27 the June 19, 2003 Order will inhibit the ability of TURN to litigate the interests of ratepayers in
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RESPONSE OF TURN TO MOTION OF SAN FRANCISCO TO LIFT OR
MODIFY JUNE 19, 2003 ORDER

1 proceedings before the California Public Utilities Commission regarding the "Settlement
2 Agreement." For the reasons stated by San Francisco, there is good cause for this Court to lift or
3 modify the June 19, 2003 Order.

4 DATED: August 8, 2003

5 Respectfully Submitted,

6 DAVIS WRIGHT TREMAINE LLP

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8 By: 

Jeffrey P. Gray

9 Attorneys for
10 THE UTILITY REFORM NETWORK

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NOTICE OF ASSOCIATION OF
COUNSEL

1 The Utility Reform Network ("TURN") hereby provides this notice of Edward W.
2 O'Neill (California State Bar No. 074866), Jeffrey P. Gray (California State Bar No. 178530),
3 and Davis Wright Tremaine LLP, One Embarcadero Center, Suite 600, San Francisco,
4 California, 94111, telephone (415) 276-6500, facsimile (415) 276-6599 as additional counsel in
5 the above-captioned matter.

6 DATED: August 8, 2003

7 Respectfully Submitted,

8 DAVIS WRIGHT TREMAINE LLP

9
10 By:  _____

11 Jeffrey P. Gray

12 Attorneys for
13 THE UTILITY REFORM NETWORK
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CERTIFICATE OF SERVICE

I, Monique Ivan-Woodruff, certify:

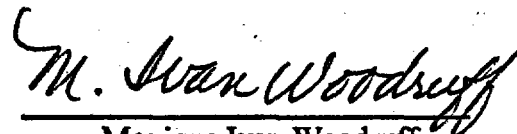
I am employed in the City and County of San Francisco, California, am over eighteen years of age and am not a party to the within entitled cause. My business address is One Embarcadero Center, Suite 600, San Francisco, California 94111-3611.

On August 8, 2003, I caused the following to be served:

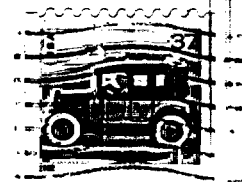
**RESPONSE OF TURN IN SUPPORT OF
MOTION OF THE CITY AND COUNTY
OF SAN FRANCISCO TO LIFT OR
MODIFY JUNE 19, 2003 ORDER**

via first-class United States mail with postage prepaid thereon, addressed to each of the parties listed on the Special Notice List effective as of July 24, 2003 and on D. Cameron Baker, Deputy City Attorney of San Francisco at cameron.baker@sfgov.org and on Dennis J. Herrera, City Attorney of San Francisco via facsimile at (415) 554-4763.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct, and that this declaration was executed on the date above at San Francisco, California.


Monique Ivan-Woodruff

Service List Case No. 01-30923 DM
Chapter 11
In re: Pacific Gas and Electric Company
United States Bankruptcy Court Northern District of California



LAWYERS

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