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SATELLITE SENIOR INCOME FUND II, and  
10 DEUTSCHE BANK TRUST COMPANY AMERICAS,  
as Successor Administrative Agent  
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12 UNITED STATES BANKRUPTCY COURT  
13 NORTHERN DISTRICT OF CALIFORNIA  
14 SAN FRANCISCO DIVISION  
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16 In re:

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18 PACIFIC GAS AND ELECTRIC  
19 COMPANY, a California corporation,

20 Debtor.  
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23

Case No.: 01-30923-DM

Chapter 11

AMENDED FACT WITNESS DISCLOSURE  
OF SATELLITE SENIOR INCOME FUND,  
SATELLITE SENIOR INCOME FUND II  
AND DEUTSCHE BANK TRUST COMPANY  
AMERICAS TO OBJECTION TO  
CONFIRMATION OF PLAN OF  
REORGANIZATION UNDER CHAPTER 11  
OF THE BANKRUPTCY CODE FOR  
PACIFIC GAS AND ELECTRIC COMPANY  
DATED JUNE 27, 2003

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Admitted *pro hac vice*.

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KELLEY DRYE &  
WARREN LLP  
NEW YORK  
NY01/WILSE/868420.1

AMENDED FACT WITNESS DISCLOSURE OF  
SATELLITE SENIOR INCOME FUND, SATELLITE SENIOR  
INCOME FUND II AND DEUTSCHE BANK TRUST

50-275/923

BKRP01

Satellite Senior Income Fund, Satellite Senior Income Fund II, as beneficial interest holders (together, "*Satellite*") and Deutsche Bank Trust Company Americas, as Successor Administrative Agent ("*Deutsche*," and together with Satellite, "*Claimants*"), hereby disclose the names and addresses of the individuals that they may call as fact witnesses in support of their objections pursuant to sections 1129(a)(1), 1129(a)(3), 1129(a)(7), 1129(a)(8), 1129(a)(11), 1129(b)(1), and 1129(b)(2) of title 11 of the United States Code, 11 U.S.C. §§ 101, *et seq.* to confirmation of the Plan of Reorganization Under Chapter 11 of the Bankruptcy Code for Pacific Gas and Electric Company, dated June 27, 2003 filed by the Pacific Gas and Electric Company ("*PG&E*") as debtor and debtor-in-possession, PG&E Corporation ("*PG&E Corp.*"), and the Official Committee of Unsecured Creditors ("*OCC*" and together with PG&E and PG&E Corp., the "*Plan Proponents*") dated June 17, 2003 (as amended and modified, the "*Plan*").

#### FACT WITNESSES

Name	Title and Address	Subject Matter of Proposed Testimony
LeRoy Barnes	Treasurer, PG&E 77 Beale Street P.O. Box 7442 San Francisco, California 94120	(a) negotiation and treatment of class 4(f) claims under the Plan and (b) implementation of the unsecured claims settlement approved on March 27, 2002 (the "Unsecured Claims Settlement")
Peter Darby	Corporate Financial Officer, PG&E 77 Beale Street P.O. Box 7442 San Francisco, California 94120	(a) negotiation and treatment of class 4(f) claims under the Plan and (b) implementation of the Unsecured Claims Settlement
Michael J. Donnelly	Assistant Treasurer, PG&E 77 Beale Street P.O. Box 7442 San Francisco, California 94120	(a) negotiation and treatment of class 4(f) claims under the Plan and (b) implementation of the Unsecured Claims Settlement
Kent M. Harvey	Senior Vice President, CFO & Treasurer, PG&E 77 Beale Street P.O. Box 7442 San Francisco, California 94120	(a) negotiation and treatment of class 4(f) claims under the Plan and (b) implementation of the Unsecured Claims Settlement

Name	Title and Address	Subject Matter of Proposed Testimony
Steve LeDoux	Financial Advisor, PG&E Rothschild Inc. 1251 Avenue of the Americas New York, New York 10020	(a) negotiation and treatment of class 4(f) claims under the Plan and (b) implementation of the Unsecured Claims Settlement
David Resnick	Financial Advisor, PG&E Rothschild Inc. 1251 Avenue of the Americas New York, New York 10020	(a) negotiation and treatment of class 4(f) claims under the Plan and (b) implementation of the Unsecured Claims Settlement
Mark Sonnino	Principal, Satellite Asset Management 623 Fifth Avenue, 20 <sup>th</sup> Floor New York, New York 10022	(a) negotiation and treatment of class 4(f) claims under the Plan and (b) implementation of the Unsecured Claims Settlement
Brent Buckley	Analyst, Deutsche Bank Securities 31 West 52 <sup>nd</sup> Street, Third Floor New York, New York 10019	(a) negotiation and treatment of class 4(f) claims under the Plan and (b) implementation of the Unsecured Claims Settlement
Matthew Doheny	Director, Deutsche Bank Securities 31 West 52 <sup>nd</sup> Street, Third Floor New York, New York 10019	(a) negotiation and treatment of class 4(f) claims under the Plan and (b) implementation of the Unsecured Claims Settlement
Person Most Knowledgeable and Custodian of Records	PG&E	Documents underlying class 5 and class 4(f) claims
Person Most Knowledgeable and Custodian of Records	Deutsche Bank Trust Company Americas	Documents underlying class 5 and class 4(f) claims
Person Most Knowledgeable and Custodian of Records	Cooperative Central Raiffeisen Boerenleenbank B.A., "Rabobank Nederland"	Documents underlying class 5 and class 4(f) claims

### RESERVATION OF RIGHTS

Claimants expressly reserve the right to (a) rely upon the witness lists submitted by the Plan Proponents, if the need arises, (b) call additional witnesses, if necessary, to testify to the authenticity, admissibility or foundation of any document, (c) call additional live witnesses based

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1 on materials identified by the Plan Proponents, (d) use additional testimony and exhibits for  
2 impeachment purposes and cross-examination, and (e) supplement or amend these disclosures  
3 should other, different or additional information be discovered.

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5 DATED: September 30, 2003

KELLEY DRYE & WARREN LLP  
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8 By: Mark I. Bane

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10 FUND, SATELLITE SENIOR INCOME  
11 FUND II, and DEUTSCHE BANK TRUST  
12 COMPANY AMERICAS, as Successor  
13 Administrative Agent  
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