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21 *International Brotherhood of Electrical Workers Local Union 1245*

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

22 In re: ) CASE NO.: 19-30088  
23 )  
24 PG&E CORPORATION and PACIFIC GAS & )  
25 ELECTRIC COMPANY ) Chapter 11  
26 )  
27 Debtors ) (Lead Case)  
28 )  
29 ) (JOINTLY ADMINISTERED)  
30 )  
31 ) **INTERNATIONAL**  
32 ) **BROTHERHOOD OF**  
33 ) **ELECTRICAL WORKERS, LOCAL**  
34 ) **UNION NO. 1245'S STATEMENT**  
35 ) **IN SUPPORT AND FURTHER**  
36 ) **RESPONSE REGARDING MOTION**  
37 ) **OF DEBTORS PURSUANT TO 11**  
38 ) **U.S.C. § 105(a) AND 363(b) AND**  
39 ) **FED. R. BANKR. P. 2002 AND**  
40 ) **6004(h) FOR AN ORDER (A)**

41 \_\_\_\_\_ Affects PG&E Corporation )  
42 \_\_\_\_\_ Affects Pacific Gas and Electric Company )  
43   X   Affects both Debtors )

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) **AUTHORIZING DEBTORS TO**  
) **ESTABLISH AND FUND**  
) **PROGRAM TO ASSIST WILDFIRE**  
) **CLAIMANTS WITH**  
) **ALTERNATIVE LIVING**  
) **EXPENSES AND (B) GRANTING**  
) **RELATED RELIEF**  
)  
)  
) Date: May 22, 2019  
) Time: 10:00 AM  
) Place: Courtroom 17, U.S. Bankruptcy  
) Court, 16th Floor, 450 Golden Gate  
) Avenue, San Francisco, California  
)

The International Brotherhood of Electrical Workers Local Union 1245 (“IBEW”), files this Statement in Support and Further Response to the *Motion of Debtors pursuant to 11 U.S.C. §§ 105(a) and 363(b) and Federal Rules of Bankruptcy Procedure 2002 and 6004(h) for Entry of an Order (a) Authorizing the Debtors to Establish and Fund Program to Assist Wildfire Claimants with Alternative Living Expenses and Other Urgent Needs and (b) Granting Related Relief* [Dkt. No. 1777] (the “Motion”) and states as follows:

**I. Introduction**

The IBEW is a labor organization affiliated with the American Federal of Labor – Congress of Industrial Organizations. The IBEW represents approximately 20,000 gas and utility employees, including thousands of employees of Pacific Gas & Electric Company (“PG&E”), throughout California. IBEW members are responsible for building, maintaining and repairing PG&E’s electric distribution and transmission systems and are therefore critical to PG&E’s ability to supply power and gas to approximately 16 million California residents. The IBEW’s members live and work throughout the communities affected by the recent devastating wildfires.

**II. Statement**

The IBEW strongly supports the establishment of the fund contemplated by the Motion to provide necessary assistance to individuals affected by recent wildfires. While the IBEW is mindful that such a fund related to pre-petition claims is not typical in Chapter 11 cases, this is not a typical

1 Chapter 11 case. By most accounts, the reorganization process may take years and require  
2 coordinated action by a number of authorities including the California legislature, CPUC, and this  
3 Court. The victims affected by recent fires cannot wait for these processes to align and will benefit  
4 greatly from immediate access to assistance.

5 The IBEW responds further that certain modifications to the program should be implemented  
6 to ensure its fairness in the context of the bankruptcy case. Specifically, the IBEW suggests that the  
7 program be modified as follows:

- 8 • Individual claimants receiving funds through the program should see a reduction in their  
9 ultimate unsecured creditor recovery through the plan process to prevent double recoveries.
- 10 • The program should have meaningful creditor and creditor committee oversight to ensure  
11 that program implementation fits the referenced need without prejudicing creditor recoveries  
12 through the eventual plan process.

13 With these modifications, the IBEW asserts the Court should approve the Motion and  
14 authorize the requested relief to fire victims while the reorganization process moves forward.

15  
16 Dated: May 15, 2019

Respectfully submitted,  
  
LOCKE LORD LLP

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