

Hearing Date: August 19, 2003 at 10:00 a.m. (Prevailing Eastern Time)
Objection Deadline: August 14, 2003 at 5:00 p.m. (Prevailing Eastern Time)

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and

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Co-Counsel for San Diego Gas & Electric
Company and Commonwealth Edison Company

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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In re	:
	:
	: Chapter 11
ALLEGIANCE TELECOM, INC., <u>et al.</u> ,	: Case No. 03-13057 (RDD)
	:
	: (Jointly Administered)
Debtors.	:
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**NOTICE OF MOTION OF CERTAIN UTILITY COMPANIES TO
(A) VACATE, PURSUANT TO RULE 9024 OF THE FEDERAL
RULES OF BANKRUPTCY PROCEDURE, ORDER DEEMING
UTILITIES ADEQUATELY ASSURED OF FUTURE PERFORMANCE
AND ESTABLISHING PROCEDURES FOR DETERMINING
REQUESTS FOR ADDITIONAL ADEQUATE ASSURANCES AND
(B) DETERMINE ADEQUATE ASSURANCES OF FUTURE PAYMENT**

PLEASE TAKE NOTICE, that on August 1, 2003, San Diego Gas & Electric Company and
Commonwealth Edison Company filed a motion (the "Motion") with this Bankruptcy Court,
pursuant to Rule 9024 of the Federal Rules of Bankruptcy Procedure, to vacate the order deeming

the utilities to be adequately assured of future performance and establishing procedures for determining requests for additional adequate assurance and determine adequate assurances of future payment. A copy of the Motion is annexed hereto.

PLEASE TAKE FURTHER NOTICE, that a hearing (the “Hearing”) will be held in connection with the entry of an order granting the relief requested in the Motion and any further relief on August 19, 2003 at 10:00 a.m. (Prevailing Eastern Time), or as soon thereafter as counsel may be heard, before the Honorable Robert D. Drain, United States Bankruptcy Judge, at the United States Bankruptcy Court for the Southern District of New York (the “Bankruptcy Court”), Alexander Hamilton Custom House, One Bowling Green, New York, New York 10004-1408.

PLEASE TAKE FURTHER NOTICE, that responses or objections to the Motion, if any, shall be made in writing, shall conform with the Federal Rules of Bankruptcy Procedure and the Local Rules of the Bankruptcy Court, and shall be filed with the Bankruptcy Court electronically in accordance with General Order M-242 (General Order M-242 and the User’s Manual for the Electronic Case Filing System can be found at <http://www.nysb.uscourts.gov>, the official website for the Bankruptcy Court), by registered users of the Bankruptcy Court’s case filing system and, by all other parties in interest, on a 3.5 inch disk, preferably in Portable Document Format (PDF), Wordperfect or any other Windows-based word processing format (with a hard-copy delivered directly to Chambers), and shall be served in accordance with General Order M-242 upon Scarcella Rosen & Slome LLP, 333 Earle Ovington Boulevard, Ninth Floor, Uniondale, New York 11553-3622, Attn: Thomas R. Slome, Esq. and Russell R. Johnson III, 3734 Byfield Place, Richmond, Virginia 23223, co-counsel for San Diego Gas & Electric Company and Commonwealth Edison Company, so as to be received by such

parties no later than August 14, 2003 at 5:00 p.m. (Prevailing Eastern Time).

Dated: Uniondale, New York
August 1, 2003

SCARCELLA ROSEN & SLOME LLP

By: /s/ Thomas R. Slome
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