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**Barbara W. Halle**  
*Assistant General Counsel*

April 20, 2007

*Via Electronic Filing and U.S. Mail*

Oregon Public Utility Commission  
Attention: Filing Center  
P.O. Box 2148  
Salem, OR 97308-2148

**Re: AR 513 - 2007 NATIONAL ELECTRIC SAFETY ADOPTION**

Attention Filing Center:

Enclosed for filing in the captioned docket are both an original and one copy of:

- **COMMENTS OF PORTLAND GENERAL ELECTRIC COMPANY.**

This document is being filed by electronic mail with the Filing Center.

An extra copy of this cover letter is enclosed. Please date stamp the extra copy and return it to me in the envelope provided.

Thank you in advance for your assistance.

Sincerely,

A handwritten signature in black ink, appearing to read "Barbara W. Halle", written in a cursive style.

**BARBARA W. HALLE**

BWH:mmd  
Enclosures

cc: Service List - AR 513

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

AR 513

In the Matter of	)	
	)	
An Amendment to Adopt the 2007 National	)	<b>COMMENTS OF PORTLAND</b>
Electric Safety Code	)	<b>GENERAL ELECTRIC COMPANY</b>
	)	
	)	

Portland General Electric Company ("PGE") appreciates the opportunity to file comments in this proposed rulemaking. PGE supports the adoption of rules as set forth in the Notice of Proposed Rulemaking Hearing filed on March 14, 2007.

However, PGE urges the Commission, when it adopts the 2007 version of the NESC, to also formally adopt the recommendation of the interested persons, described in the Fiscal and Economic Impact Statement within the Notice of Proposed Rulemaking Hearing, to hold a workshop or a meeting on or about June 1, 2008 in which the impacts of the arc-hazard rules, the possible conflicts with other rules, and effective implementation dates will be discussed. This should give the participants enough time to gather relevant information and experience so that the discussion will be meaningful.

In addition, PGE again suggests that a provision be added to the Oregon Administrative Rules, consistent with the adopted version of the NESC, stating that the Commission may grant waivers from the rules contained in the Code for specific installations, whether occurring as an isolated instance or in multiple locations, where equivalent safety can and will be provided in

other ways. Ideally, a process, timelines and standards for granting the waiver would be included in such a rule.

DATED this 20<sup>th</sup> day of April 2007.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "Barbara W. Halle", written over a horizontal line.

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CERTIFICATE OF SERVICE

I hereby certify that I have this day caused COMMENTS OF PORTLAND GENERAL ELECTRIC COMPANY to be served by electronic mail to those parties whose email addresses appear on the attached service list, and by First Class US Mail, postage prepaid and properly addressed, to those parties on the attached service list who have not waived paper service from OPUC Docket No. AR 513.

Dated at Portland, Oregon, this 20<sup>th</sup> day of April 2007.

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