



# IBEW Local 125

International Brotherhood of Electrical Workers

November 19, 2021

Oregon Public Utilities Commission  
PO Box 1088  
Salem, OR 97308-1088

**RE: Docket AR 638 Wildfire Mitigation Plan  
Docket AR 648—Wildfire Mitigation Rulemaking**

Dear Chair Decker,

IBEW Local 125 appreciates the ability to provide comments on the draft AR 638 Phase II permanent rules. Our members will be on the front lines along with so many others during wildfire season. IBEW Local 125 appreciates the efforts by staff to navigate this rulemaking. With a collaborative effort, we are confident that Oregon can reduce the risk of wildfires. Thus, we are committed to preventing wildfires and being able to respond in the safest most efficient manner when they occur.

**Division 860-0240-0010  
Construction, Operation, and Maintenance of Electrical Supply and Communication Lines**

We propose language to support this section that provides additional clarification and ensures qualified workers are constructing, operating, and maintaining electrical supply and communication lines. Our suggested language: *Prohibit individuals who are not qualified electrical workers from performing certain work on the electrical infrastructure.*

**860-024-0011  
Inspections of Electric Supply and Communication Facilities**

We propose adding the following language: *Individuals performing detailed inspections associated with wildfire mitigation, including those done using technology such as aerial drones, must be qualified electrical workers.*

**860-024-0016**

**Minimum Vegetation Clearance Requirements**

To ensure Minimum Vegetation Clearance Requirements are met, we propose including this language: *Qualified line clearance tree trimmers will have the necessary related-training to perform the work associated with these rules. Apprentice line clearance tree trimmers shall work under the direct supervision of qualified line clearance tree trimmers. Certain work involving technology such as aerial drones shall be done by a qualified line clearance tree trimmer or qualified electrical worker.*

In conclusion, IBEW members play a critical and essential role in ensuring our electrical infrastructure is able to operate safely and reliably. We encourage rules that require qualified workers to ensure that Oregon is able to minimize risk of wildfires and restore essential infrastructure in the event of wildfires. Again, thank you for allowing us to comment on this wildfire rulemaking effort. IBEW Local 125 looks forward to continued discussion in this process.

Sincerely,



Marcy Grail  
Assistant Business Manager  
IBEW Local 125

C: Commissioner Letha Tawney  
Commissioner Mark Thompson  
Lori Koho