



**Portland General Electric Company**  
121 SW Salmon Street • 1WTC0306 • Portland, OR 97204  
portlandgeneral.com

October 21, 2022

***Via Electronic Filing***

Public Utility Commission of Oregon  
Attention: Filing Center  
P.O. Box 1088  
Salem, OR 97308-1088

**RE:** AR 638 – Resolution of Violations of Commission Safety Rules in High Fire Risk Zones AR 638

Dear Judge Mapes,

On October 7, 2022, the Public Utility Commission of Oregon posted a Notice of Proposed Rulemaking Hearing and Rulemaking Hearing Workshop with the Oregon Secretary of State and sent it electronically to the AR 638 service list. The Notice included a new proposed rule (OAR-860-024-0061) that creates a complaint process for utilities and the owners of foreign equipment on utility systems.

Portland General Electric Company (“PGE”), PacifiCorp d/b/a Pacific Power (“PacifiCorp”), and Idaho Power Company (“Idaho Power”) (collectively referred to as the “Joint Utilities”), support the proposed OAR 860-024-0061 language which you submitted in that Notice.

Sincerely,

/s/ W.M. Messner  
William M. Messner  
Director, Wildfire Mitigation & Resiliency  
Portland General Electric

/s/ Amy McCluskey  
Amy McCluskey  
Managing Director, Wildfire Safety & Asset Management  
PacifiCorp

/s/ Alison Williams  
Regulatory Policy & Strategy Advisor  
Idaho Power