



Portland General Electric Company
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July 6, 2022

Via Electronic Filing

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

RE: AR 638 – Risk-Based Wildfire Protection Plan Proposed Rules

Dear Judge Mapes,

On June 30, 2022, the Oregon Citizens' Utility Board (CUB) filed comments on the Division 24 and Division 300 rules as proposed by the AHD. Those comments are the first comments that CUB has submitted in AR 638 since it submitted its initial comments on January 28, 2021.

As you are aware, over the last year and a half there have been a significant number of meetings to discuss the draft and proposed rules, with multiple rounds of comments by multiple parties. The Joint Utilities have found collaboration with these parties to be valuable but, unfortunately, CUB was not one of those parties.

CUB's comments filed on June 30, 2022, include many edits to the proposed rules that raise new issues, and the Joint Utilities would like the opportunity to officially respond to CUB's proposed edits. As such, the Joint Utilities request an extension to the Comment Period to July 21, 2022, solely to allow Parties the opportunity to respond to CUB's June 30, 2022, comments. Extending the Comment Period to July 21 would give the Commission two weeks to review any comments received as the "other than PSPS rules" will be considered at the Commission's August 4, 2022, Public Meeting.

Thank you for your consideration and expedited ruling on this request.

Sincerely,

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

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

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