



# IBEW Local 125

International Brotherhood of Electrical Workers

May 3, 2021

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

## **RE: AR 638 Wildfire Mitigation Plan—Draft Temporary Rules**

Dear Chair Decker,

IBEW Local 125 appreciates the ability to provide comments on the Wildfire Protection Plan Rulemaking AR 638 temporary rules. Our members will be navigating the consequences of wildfires and Public Safety Power Shutoffs, so we are committed to strategies and actions which mitigate these risks. While no organization may be ready for the identified temporary rules, there is no time to lose in working towards resolving these challenges.

IBEW members are qualified electrical workers who play a critical and essential role in ensuring our electrical infrastructure is able to operate safely and reliably. By ensuring there is an appropriate level of staffing in local areas, utilities can ensure that these employees have training that is specific to that area and are best prepared to assist during wildfires and/or other emergencies. Our members not only do the work but live in these communities. Their knowledge and feedback can provide significant insight to public safety providers as well as the general public.

IBEW members are on the frontlines, and their knowledge is invaluable during Public Safety Power Shutoff, including de-energization which can generate its own risks since necessary communication resources are likely to be unavailable. As utilities wrestle with the decision to conduct such shutdowns, it is essential that there are boots on the ground—qualified electrical workers—to identify hazards, conduct necessary patrols, and perform all necessary tasks that ensure the safe shutoff and subsequent energization of electrical lines and facilities.

Again, thank you for allowing us to comment on these draft temporary rules.

Sincerely,

A handwritten signature in black ink that reads "Marcy Grail". The signature is written in a cursive, flowing style.

Marcy Grail  
Assistant Business Manager  
IBEW Local 125

C: Commissioner Letha Tawney  
Commissioner Mark Thompson  
Lori Koho