

6/25/2010

Public Utility Commission of Oregon
550 Capitol St NE #215
PO Box 2148
Salem OR 97308-2148

RE: AR 538 & UM 1452

Dear Commissioners,

Please accept the following comments on behalf of the National Electrical Contractors Association and the International Brotherhood of Electrical Workers with regard to safety and compliance standards for installation of renewable energy facilities. Over the past several years, NECA and IBEW have been successful in encouraging the Legislature to adopt legislation requiring the appropriate construction licenses and the use of building permits in construction projects.

This type of responsible bidder policy helps to assure safety for the public/consumers and for the utility workers exposed to hazards resulting from improperly installed systems as well as the integrity of the electrical distribution system by explicitly requiring contractors performing work to show proof of possessing the appropriate and current construction licenses—and that they obtained the appropriate building permits and the corresponding safety inspections legally required to do perform construction work in Oregon.

Responsible bidder policies are not only good for responsible contractors; they are also good for the State. It is important that implementation policies for emerging financing models and pilot projects maintain consistent with the values of the State.

UM1452 (IV.B.4.F) states, “Staff’s proposed rules in docket AR 538 require pilot program systems to meet quality and service standards established by this Commission.” We respectfully request and encourage the Public Utility Commission to amend the proposed rules and/or quality standards to:

1. Ensure contractors who perform work under the proposed rule hold the appropriate and current construction license prior to work being performed;
2. Ensure that a project has gone through the appropriate building permitting process and passed the corresponding safety prior to an energy facility being connected to the grid.

Accepting these recommendations will increase the likelihood of hiring a contractor who complies with employment laws and regulations, and fulfills permit and safety inspection requirements. In short, this will ensure that only qualified, responsible contractors perform work.

We respectfully request you to include these comments as part of the administrative record for this important rulemaking process.

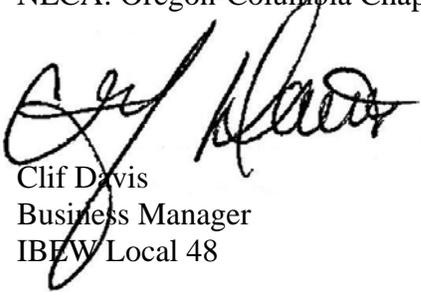
Sincerely,



Tim Gauthier
Executive Manager
NECA: Oregon-Columbia Chapter



Terry Hatch
Executive Manager
NECA: Oregon Pacific-Cascade Chapter



Clif Davis
Business Manager
IBEW Local 48



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