



Portland General Electric Company
Legal Department
121 SW Salmon Street, 1WTC1301
Portland, Oregon 97204
Phone 503-464-7822
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portlandgeneral.com

Kim S. Burton
Assistant General Counsel III
kim.burton@pge.com

October 8, 2024

Via Electronic Filing

Public Utility Commission of Oregon
Attention: Filing Center
201 High Street SE, Suite 100
Salem, Oregon 97301

Re: UE 435 – PGE’s Request for a General Rate Revision

Dear Filing Center:

Enclosed for filing in the above-captioned docket is PGE’s Cross Examination Statement and Exhibits.

PGE/3206’s Attachments A through C are submitted in electronic format to maintain its native format.

PGE/3204 is submitted separately as a confidential and protected under General Protective Order 23-132.

Thank you for your assistance.

Sincerely,

A handwritten signature in blue ink, appearing to read "KSB", is written over a light blue rectangular background.

Kim S. Burton
Assistant General Counsel III

KMB:ld

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON
UE 435**

In the Matter of

PORTLAND GENERAL ELECTRIC
COMPANY,

Request for General Rate Revision.

**PORTLAND GENERAL ELECTRIC
COMPANY'S CROSS-EXAMINATION
STATEMENT**

Pursuant to OAR 860-001-0480 and Administrative Law Judge's April 1, 2024 Prehearing Conference Memorandum and September 27, 2024 Memorandum Regarding Hearing Procedures, Portland General Electric Company (PGE) submits the following cross-examination statement in this matter regarding the General Rate Revision.

Witnesses

PGE submits the following list of witnesses for cross-examination:

Witness (Party)	Subject Matter	Counsel	Est. Time
Luz Mondragon (Staff)	Routine Vegetation Management	Derily Bechthold	35 minutes

Exhibits

PGE submits the following list of exhibits:

Witness	Exhibit No.	Description
	PGE/3201	PGE Response to CUB DR 124
	PGE/3202	PGE Response to AWEC DR 214
	PGE/3203	PGE Response to AWEC DR 206 and 206A
	PGE/3204C	PGE Response to AWEC DR 225
	PGE/3205	PGE Response to OPUC DR 446
	PGE/3206	PGE Response to OPUC DR 458 and 458A-C

Staff - Luz Mondragon	PGE/3207	OPUC Utility Safety Report
Staff - Luz Mondragon	PGE/3208	UE 416 Exhibit 3600, pages 10,13-15
Staff - Luz Mondragon	PGE/3209	UE 416 Exhibit 2201, OPUC Response to PGE DR 06

List of Individuals Attending Confidential Sessions

Kim Burton	Jacquelyn Ferchland
Shay LaBray	Greg Batzler
Derily Bechtold	Stephen Leeb
Kristen Tranetzki	Shelley Brueggemann
Rob Macfarlane	

PGE reserves the right to ask follow-up questions of any witness cross-examined by another party or the Administrative Law Judge.

DATED this 8th day of October, 2024.

Respectfully Submitted,



Kim S. Burton, OSB #221958
Assistant General Counsel III
121 SW Salmon Street, 1WTC1301
Portland, Oregon 97204
Phone: 573.356.9688
Email: kim.burton@pgn.com

August 29, 2024

To: Ryan Tran
Oregon Citizens' Utility Board

From: Jaki Ferchland
Senior Manager, Revenue Requirement

Portland General Electric Company
UE 435
PGE Response to CUB Data Request 124
Dated August 23, 2024

Request:

Please refer to PGE Reply Testimony, Exhibit 1000, Ferchland-Liddle at page 17. PGE states that since 2022 it has “under-recovered approximately \$150 million as a result of regulatory lag on capital investments.” Regulatory lag works in both directions (the Company experiences it on new investments, and the customer experiences it due to applying a rate of return without updating depreciation).

- a. Does the \$150 million cited by PGE include both sides of regulatory lag, or is it limited to the regulatory lag experienced by the Company?
- b. If it does not include both sides of regulatory lag, please identify the regulatory lag associated with depreciation that customers have experienced during the same time period.

Response:

The \$150 million represents both sides of regulatory lag.

October 7, 2024

To: Nannette Moller
Alliance of Western Energy Consumers

From: Jaki Ferchland
Senior Manager, Revenue Requirement

Portland General Electric Company
UE 435
PGE Response to AWEC Data Request 214
Dated October 2, 2024

Request:

Reference PGE/2500 at 38:10-13: Please explain why it is necessary for PGE to increase the administrative and general expenses for revolver fees when, according to the referenced testimony, PGE's operating results already include those expenses.

Response:

PGE states in reference PGE/2500 at 38:10-13 testimony that the revolver fees are expenses reflected in the results of operation and cites PGE's Exhibit 1400 in which we state, "contrary to AWEC's assertion, [revolver fees] are included within PGE's results of operations reporting."¹ A statement AWEC did not respond to in rebuttal testimony. Specifically, PGE was referring to its actual regulated results of operations reports as filed in RE 119, in which we make a Type 1 adjustment to include revolver fees in administrative and general expense.

¹ PGE/1400, Mersereau – Van Oostrum – Batzler/43 at 19-20.

October 7, 2024

To: Nannette Moller
Alliance of Western Energy Consumers

From: Jaki Ferchland
Senior Manager, Revenue Requirement

Portland General Electric Company
UE 435
PGE Response to AWEC Data Request 206
Dated October 2, 2024

Request:

Please provide any metrics or other corporate documents that govern when and under what conditions members of PGE's board of directors are entitled to stock compensation.

Response:

PGE's Board of Directors stock compensation is paid out at a market informed flat-rate to each director. No metrics are utilized in the awarding of this compensation.

Attachment 206-A provides the requested information.

Determination of Director Compensation

The compensation of our non-management directors is determined by the Board of Directors upon a recommendation from the Compensation, Culture and Talent Committee. The Compensation, Culture and Talent Committee makes its recommendation after receiving input from its independent compensation consultant and management. The Compensation, Culture and Talent Committee retained FW Cook to evaluate and make recommendations regarding director compensation for 2023. FW Cook's evaluation included identifying industry trends and market data for directors' compensation, reviewing and identifying peer group companies, and evaluating director compensation data for these companies. Management's input focuses on compliance, legal and administrative matters.

In July 2023, the Compensation, Culture and Talent Committee recommended and the Board agreed to adjustments to non-management director compensation to bring them into reasonable alignment with the market. Based on recommendations from FW Cook, the Compensation, Culture and Talent Committee recommended and the Board agreed to increase the equity compensation for directors to \$145,000.

2023 Director Compensation Table

The table below shows the compensation earned by each individual who served as a director during the year ended December 31, 2023, with the exception of Ms. Pope, whose compensation is described in the Summary Compensation Table and related tables and disclosure beginning on page 66.

Name	Fees Earned or Paid in Cash (\$) ⁽¹⁾	Stock Awards (\$) ⁽²⁾	All Other Compensation (\$) ⁽³⁾	Total (\$)
Rodney Brown ⁽⁴⁾	55,000	–		55,000
Jack Davis ⁽⁴⁾	107,500	–	834	108,334
Dawn Farrell	110,000	144,973		254,973
Mark Ganz	110,000	144,973		254,973
Marie Oh Huber	110,000	144,973		254,973
Kathryn Jackson	130,000	144,973		274,973
Michael Lewis	125,000	144,973		269,973
Michael Millegan	110,000	144,973		254,973
Lee Pelton	125,000	144,973		269,973
Patricia Pineda	121,250	144,973		266,223
James Torgerson	207,500	144,973		352,473

1. Amounts in this column include all fees earned for Board and committee service, regardless of whether such amounts were deferred under our 2006 Outside Directors' Deferred Compensation Plan.
2. Amounts in this column represent the aggregate grant date fair value of RSU awards made in 2023, computed in accordance with FASB ASC Topic 718, Compensation - Stock Compensation, without considering estimated forfeitures, based on the NYSE closing price of our common stock on the grant dated July 21, 2023.
3. Mr. Davis was provided with a fringe benefit related to spousal travel for his final Board meeting with the Company. No other compensation was paid in 2023.
4. Mr. Brown and Mr. Davis served as directors until their Board terms ended on April 20, 2023.

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PGE/3204 is submitted Confidentially

May 28, 2024

To: Bryan Conway
Public Utility Commission of Oregon

From: Jaki Ferchland
Senior Manager, Revenue Requirement

Portland General Electric Company
UE 435
PGE Response to OPUC Data Request 446
Dated May 10, 2024

Request:

Please discuss how the on-peak and off-peak differential of 15 mills/kWh for Schedule 90 was determined.

Response:

PGE Schedule 90 customers typically have monthly load factors in the 90-100% range as they typically operate around the clock and, therefore, have less potential for shifting load. Due to the high load factor for these customers, PGE has always set the energy on-peak and off-peak differential for Schedule 90 customers to be de minimis between on-peak and off-peak.

The on-peak and off-peak differential of 15 mill/kWh for Schedule 90 has existed since Schedule 90's creation in 2015.

May 29, 2024

To: Bryan Conway
Public Utility Commission of Oregon

From: Jaki Ferchland
Senior Manager, Revenue Requirement

Portland General Electric Company
UE 435
PGE Response to OPUC Data Request 458
Dated May 15, 2024

Request:

Please provide all workpapers and data used to determine the Load Following Credit rate. For the last three general rate case, as well as this general rate case, please provide the breakdown of the Load Following Rate Credit between the portion of the cents/kWh recovered from the large industrial customers and the portion recovered from other classes of customers.

Response:

The Load Following Rate Credit calculation and data is contained in PGE's Ratespread workpaper.

Attachment A provides the Ratespread from UE 416 PGE's 2024 GRC.

Attachment B provides the Ratespread from UE 394 PGE's 2022 GRC.

Attachment C provides the Ratespread from UE 335 PGE's 2019 GRC.

The "Load Follow" tab in each of the attachments contains the breakdown of the Load Following Rate Credit between the portion of the cents/kWh recovered from the large industrial customers and the portion recovered from other classes of customers.

September 9, 2014

JIM PIRO
PRESIDENT & CEO
PORTLAND GENERAL ELECTRIC
121 SW SALMON ST
PORTLAND, OR 97204

RE: OPUC Report No. E14-58, Portland General Electric (PGE)

Enclosed is a copy of OPUC Safety Report No. E14-58, which cites probable violations of the National Electrical Safety Code (NESC) on your system.

OPUC Staff recently performed the annual review of PGE's vegetation management program. This occurred in the communities listed within the body of the report. The review was performed primarily during the month of August, 2014. In conducting this review, Staff visited multiple areas within PGE's service territory in order to determine the effectiveness of PGE's vegetation management program in different geographic and demographic conditions.

Staff observed 353 locations where evidence existed of contact between vegetation and primary electrical conductors. A breakdown of the locations follows:

- Twenty-two of those are readily climbable trees.
- Six of the locations involve vines that have grown up poles and guy wires until they are touching, or about to touch, energized primary conductors. These and the readily climbable trees are considered to be hazards.
- One involves a situation where the primary conductor is still in place, but had breakers cut into each end, creating a de-energized span, however the span needs to be maintained or removed
- The remaining 324 locations involve trees that should have been trimmed during the normal cycle. It should again be noted that many of the listed locations involve multiple trees in contact with primary conductors.

Staff recognizes that the overall numbers appeared to trend downward since 2010, although this year represents a slight uptick from 2013. Staff continues to believe that this number of

OPUC Safety Report E14-58
Page two

violations can be eliminated by obtaining a greater clearance when trimming, or by transitioning to shorter cycle-periods to ensure that end-of-cycle clearances do not violate the minimum clearance requirements stated in OAR 860-024-0016.

The attached report represents Staff's conclusions and recommendations. In response to this report:

On or before October 15, 2014, submit written correspondence confirming correction of the probable violations related to readily climbable trees, as well as those listed specifically as hazardous conditions.

On or before March 17, 2015, submit written correspondence confirming correction of the remaining probable violations cited in this report.

If a time extension is needed, submit a written request stating the reason(s) for the delay and the proposed schedule to complete the work. If government permits are causing a delay, include the date the permits were applied for and a permitting agency contact person and telephone number. If you disagree with any cited probable violation, please furnish Staff a letter within 30 days requesting an informal conference.

If you have any questions regarding this letter or report, please contact me at the number listed below, Gary Putnam at (503) 373-1832, or Mark Rettmann at (503) 378-5362.

Lori Koho
Administrator
Utility Safety, Reliability, and Security Division
(503) 378-8225

Attachments: Violation Report

**OREGON PUBLIC UTILITY COMMISSION
UTILITY SAFETY REPORT**

DATES OF REVIEW: July 30-Aug1, 2014 REPORT NO.: E14-58
 UTILITY OPERATOR: Portland General Electric (PGE)
 LOCATION OF REVIEW: Annual review of vegetation management program at various locations system-wide.
 UTILITY REPRESENTATIVES: None present
 OPUC REPRESENTATIVES: John Wallace/Gary Putnam/Mark Rettmann/Paul Birkeland

COVERAGE: It should not be assumed that this review discovered all violations, or that the recommendations, if followed would ensure compliance with the National Electrical Safety Code (NESC). Any included "remarks" or "recommendations" should not be construed as PUC Orders. The reader is referred to the latest edition of the NESC adopted in OAR 860-024-0010 for the minimum safety requirements for electric supply and telecommunication lines.

NOTICE OF PROBABLE VIOLATIONS CITED:

A. Citation:	Readily climbable tree with inadequate clearance to high voltage conductor.
Reference:	NESC Rules Number: 012C, 218 and OAR 860-024-0016
	Locations Pole Numbers Comments

All of Salem and west of Interstate 5 from Salem to Wilsonville including Salem, Turner, Silverton, St Paul, Donald, Brooks, Grand Ronde, Willamina, Sheridan, Ballston, Amity, Dayton, Lafayette, Carlton, Yamhill, Newburg,

1.	9482 SE 70 th Avenue, south of Turner	C9 2-03 00054	Hazard: climbable deciduous tree shows evidence of contacting primary conductors.
2.	402 SE 63 rd Avenue, Salem	C7 2-28 01833	Hazard: climbable evergreen tree shows evidence of contacting primary conductors.
3.	Browning Avenue SE, Salem (Between 467 and 485 Browning)	C8 3-03 05619	Hazard: climbable deciduous tree shows evidence of contacting primary conductors.
4.	1914 37 th Avenue NW, Salem	C7 3-18 09403	Hazard: climbable deciduous tree shows evidence of contacting primary conductors.
5.	9700 SW River Bend Road, McMinnville	C5 4-08 01551	Hazard: climbable deciduous tree shows evidence of contacting primary conductors.
6.	7175 SE Wallace Road, Dayton	C4 3-21 02219	Hazard: climbable deciduous tree shows evidence of contacting primary conductors. (Filbert Orchard)

West of Interstate 5 from Sherwood to the Columbia River including Sherwood, Tualatin, Tigard, Beaverton, Garden Home, Aloha, Farmington, North Plains, Hillsboro, Scappoose, Sauvie Island, St Johns, NW Portland east of I-5

No readily climbable trees showing evidence of contacting the primary conductor were observed during this inspection cycle.

East of Interstate 5 and west of Interstate 205 from West Linn to the Columbia River including West Linn, Clackamas, Gladstone, Lake Oswego, Milwaukie, Sellwood, SE Portland west of Interstate 205

7.	1808 SE 35 th Place, Portland	D1 1-01D 00159	Hazard: climbable deciduous tree shows evidence of contacting the primary conductor.
8.	1148 SE 84 th Avenue, Portland	D1 2-04B 00045	Hazard: climbable evergreen tree shows evidence of contacting the primary conductor.
9.	8635 SE Taylor Street, Portland	D1 2-04B 00171	Hazard: climbable deciduous tree shows evidence of contacting the primary conductor.
10.	3203 SE 75 th Avenue, Portland	D1 2-08A 00277	Hazard: climbable deciduous tree shows evidence of contacting the primary conductor.
11.	6635 SE Alberta Avenue, Portland	D1 2-29 04526	Hazard: climbable evergreen tree shows evidence of contacting the primary conductor.
12.	4220 SE Cooper Street, Portland	D1 2-19B 00145	Hazard: climbable deciduous tree shows evidence of contacting the primary conductor.
13.	4311 Nehalem Street, Portland	D1 2-19C 00150	Hazard: Two climbable deciduous trees show evidence of contacting the primary conductor.
14.	4217 Crystal Springs Boulevard, Portland	D1 2-19C 00154	Hazard: Two climbable deciduous trees show evidence of contacting the primary conductor.
15.	3746 SE Monroe Street, Portland	D1 1-36 00239	Hazard: climbable deciduous tree shows evidence of contacting the primary conductor.
16.	6522 SE Jordan Avenue, Portland	D1 2-29C 03667	Hazard: climbable deciduous tree shows evidence of contacting the primary conductor.

East of Interstate 5 from Silverton to Canby including Silverton, Mt Angle, Monitor, Gervais, Woodburn, Molalla, Colton, Hubbard, Aurora, Canby, Mulino, Beaver Creek, Estacada

17.	Across from 1200 Belle Passi Road, Woodburn	C5 1-19 03597	Hazard: two climbable evergreen trees show evidence of contacting primary conductors.
18.	15468 Union School Road, Woodburn	C5 1-15 02283	Hazard: climbable evergreen tree shows evidence of contacting primary conductors.
19.	7471 Lone Elder Road, south of Canby	D4 1-17 00278	Hazard: climbable deciduous (filbert) tree shows evidence of contacting primary conductors.
20.	32845 Wildcat Mountain Road, Eagle Creek	D3 4-04 03163	Hazard: several climbable deciduous (walnut) trees show evidence of contacting primary conductors.

East of Interstate 205 from Oregon City to the Columbia River including Oregon City, Boring, Sandy, Welches, Wemme, Happy Valley, SE Portland east of Interstate 205, Gresham

21.	34175 SE Brooks Road, east of Gresham	D1 4-34 03803	Hazard: two climbable deciduous trees show evidence of contacting primary conductors.
22.	905 SW Halsey Street, Fairview, Wood Village	A1 3-26 01926	Hazard: climbable deciduous tree shows evidence of contacting primary conductors.

B. Citation:	Trees interfering with or near high voltage conductor.		
Reference:	NESC Rules Number: 012C, 218 and Oregon Administrative Rule 860-024-0016.		
	Location	Pole Number	Comments

All of Salem and west of Interstate 5 from Salem to Wilsonville including Salem, Turner, Silverton, St Paul, Donald, Brooks, Grand Ronde, Willamina, Sheridan, Ballston, Amity, Dayton, Lafayette, Carlton, Yamhill, Newburg,

1.	Two spans north of 8524 Shaff Road, south of Aumsville	C9 2-11 00500	Deciduous tree shows evidence of contacting primary conductors.
2.	One span west of 8643 Shaff Road, south of Aumsville	C9 2-01 00550	Deciduous tree shows evidence of contacting primary conductors.
3.	Across from 8334 Shaff Road, south of Aumsville	C9 2-11 00078	Deciduous tree shows evidence of contacting primary conductors.
4.	One span north of 8492 SE 70 th Avenue, Turner	C8 2-34 01948	Deciduous tree shows evidence of contacting primary conductors.
5.	9856 Marion Road, Turner	C9 2-03 00041	Deciduous tree shows evidence of contacting primary conductors.
6.	6586 Little Road SE, Turner	C9 2-03B 00411	Three deciduous trees show evidence of contacting primary conductors.
7.	6846 Little Road SE, Turner	C9 2-03 00416	Evergreen tree shows evidence of contacting primary conductors.
8.	8662 SE 70 th Avenue, south of Turner	C8 2-34 00972	Deciduous tree shows evidence of contacting primary conductors.
9.	7474 SE Mill Creek Road, east of Turner	C8 2-34 00017	Deciduous tree shows evidence of contacting primary conductors.
10.	7060 Combest Lane, Turner	C8 2-28 00332	Deciduous tree shows evidence of contacting primary conductors.
11.	Intersection SE Culver Drive and SE Deer Park Drive, Salem	C8-2-04 00044	Deciduous tree shows evidence of contacting primary conductors.
12.	7270 Jordan Street SE, Salem	C8 2-10D 00694	Deciduous tree shows evidence of contacting primary conductors.
13.	Waldo Hills Road, one span north of Jordan Road, Salem	C8 1-18 00209	Deciduous tree shows evidence of contacting primary conductors.
14.	2517 SE 74 th Avenue, Salem	C8 2-03 00053	Evergreen tree shows evidence of contacting primary conductors.
15.	7751 Macleay Road SE, Salem	C8 2-02 00485	Two deciduous trees show evidence of contacting primary conductors.
16.	Intersection SE Dunsmere Street and Macleay Road, Salem	C8 2-03 01147	Deciduous tree shows evidence of contacting primary conductors.

17.	9300 State Street SE, Salem	C7 4-25 01769	Evergreen tree shows evidence of contacting primary conductors.
18.	331 SE 62 nd Avenue, Salem	C7 2-33 03873	Several deciduous trees show evidence of contacting primary conductors.
19.	840 Elma Avenue SE, Salem	C7 2-31 01077	Deciduous tree shows evidence of contacting primary conductors.
20.	4298 Hager Street SE, Salem	C7 2-31D 00069	Deciduous tree shows evidence of contacting primary conductors.
21.	342 Elma Avenue SE, Salem	C7 2-31A 00073	Deciduous tree shows evidence of contacting primary conductors.
22.	278 Evelyn Avenue NE, Salem	C7 4-30D 02333	Deciduous tree shows evidence of contacting primary conductors.
23.	Behind 396 Benji Court, Salem	C7 2-30C 00017	Deciduous tree shows evidence of contacting primary conductors.
24.	2690 Hollywood Drive NE, Salem	C7 2-13D 00156	Two deciduous trees show evidence of contacting primary conductors.
25.	4630 Glendale Avenue NE, Salem	C7 2-18 02597	Several deciduous trees show evidence of contacting primary conductors.
26.	Intersection Ketchikan Avenue NE and Brown Road, Salem	C7 2-18 00300	Deciduous tree shows evidence of contacting primary conductors.
27.	3657 Watson Avenue NE, Salem	C7 2-18B 04115	Deciduous tree shows evidence of contacting primary conductors.
28.	4490 Cordon Road, Salem	C7 2-05D 00406	Deciduous tree shows evidence of contacting primary conductors.
29.	510 N. Hemlock Street, Yamhill	C3 4-04A 01916	Deciduous tree shows evidence of contacting primary conductors.
30.	18281 NW Adcock Road, Yamhill	C2 4-33 00695	Deciduous tree shows evidence of contacting primary conductors.
31.	7848 Pike Road, Yamhill	C2 4-33 00384	Evergreen tree shows evidence of contacting primary conductors.
32.	8760 Pike Road, Yamhill	C2 4-32 00387	Deciduous tree shows evidence of contacting primary conductors.
33.	11770 Pike Road, Yamhill	Not accessible	Deciduous tree shows evidence of contacting primary conductors.
34.	14940 Westside Road, Yamhill	C3 4-08 01395	Deciduous tree shows evidence of contacting primary conductors.
35.	9205 Sunnyside Road SE, Salem	C9 3-02 00024	Deciduous tree shows evidence of contacting the primary conductor.
36.	8656 Sunnyside Road SE, Salem	C8 3-35 023-78	Deciduous tree shows evidence of contacting the primary conductor.
37.	1365 Rees Hill Road SE, Salem	C8 3-23 03414	Deciduous tree shows evidence of contacting the primary conductor.
38.	Faragate Street South, 6 spans west of the intersection with Brown Island Road, Salem	C7 3-31 09567	Deciduous tree shows evidence of contacting the primary conductor.
39.	5020 Liberty Road South, Salem	C8 3-09D 00047	Two deciduous trees show evidence of contacting the primary conductor.

40.	306 Madrona Avenue SE, Salem	C8 3-03 00987	Deciduous tree shows evidence of contacting the primary conductor.
41.	1730 "B" Street NE, Salem	C7 3-23 03089	Deciduous tree shows evidence of contacting the primary conductor.
42.	5651 Zena Road NW, Salem	C6 4-26B 00276	Deciduous tree shows evidence of contacting the primary conductor.
43.	3654 Orchard Heights Place NW, Salem	C7 3-18 05578	Two evergreen trees show evidence of contacting the primary conductor.
44.	Intersection of Orchard Heights Place NW and 37 th Avenue NW, Salem	C7 3-18 05588	Deciduous trees show evidence of contacting the primary conductor.
45.	Intersection of 40 th Avenue NW and Dahlia Way NW, Salem	C7 4-13 00505	Evergreen tree shows evidence of contacting the primary conductor.
46.	16275 SE Alderman Road, Dayton	C5 3-09 00184	Deciduous tree shows evidence of contacting the primary conductor.
47.	16205 SE Alderman Road, Dayton	C5 3-09 00184	Deciduous tree shows evidence of contacting the primary conductor.
48.	20146 Grand Island Loop Road, Dayton. Pump tap five spans south of road, west of house.	C5 3-23B 00336	Deciduous tree shows evidence of contacting the primary conductor.
49.	21428 Grand Island Loop Road, Dayton. Six spans east of house.	C5 3-23 00382	Deciduous tree shows evidence of contacting the primary conductor.
50.	7001 SE Amity Road, Amity. Two spans east of house.	C5 4-27 00701	Deciduous tree shows evidence of contacting the primary conductor.
51.	5965 SE Amity Road, Amity	C5 4-28 00297	Deciduous tree shows evidence of contacting the primary conductor.
52.	Intersection SE Nursery Street and SE Jellison Avenue, Amity	C5 4-29A 00354	Deciduous trees show evidence of contacting the primary conductor.
53.	10995 SE Starr Quarry Road, Dayton	C5 4-1 01108	Deciduous tree shows evidence of contacting the primary conductor.
54.	6160 SE Webfoot Road, Dayton	C4 3-20 01869	Deciduous tree shows evidence of contacting the primary conductor.
55.	24395 Yamhill River Road, Willamina	C6 7-15 01159	Deciduous tree shows evidence of contacting the primary conductor.
56.	32150 West Valley Highway, Sheridan	C5 6-32 00301	Several deciduous trees show evidence of contacting the primary conductor in this span.
57.	749 West Main Street, Sheridan	C5 6-34 00917	Deciduous tree shows evidence of contacting the primary conductor.
58.	560 NE Cherry Hill Road, Sheridan	C5 6-26 00398	Deciduous tree shows evidence of contacting the primary conductor.
59.	20000 SW Muddy Valley Road, Mc Minnville,	C5 5-09 00050	Deciduous tree shows evidence of contacting the primary conductor.
60.	10105 Wheatland Road North, Salem	C6 3-11 00606	Deciduous tree shows evidence of contacting the primary conductor.
61.	Three spans west of 3111 Waconda Road NE, Salem.	C6 3-01 00516	Deciduous tree shows evidence of contacting the primary conductor.
62.	3481 Brooklake Road NE, Salem	C6 3-13 01197	Deciduous tree shows evidence of contacting the primary conductor.

63.	12783 River Road NE, Salem	C5 2-30 00116	Deciduous tree shows evidence of contacting the primary conductor.
64.	7445 Crosby Road NE, Woodburn	C4 2-35 01193	Deciduous tree shows evidence of contacting the primary conductor.
65.	9318 Champoeg Road NE, Aurora	C4 2-01 01077	Deciduous tree shows evidence of contacting the primary conductor.
66.	Two spans north of 22317 Case Road NE, Aurora.	C4 2-12 01123	Deciduous tree shows evidence of contacting the primary conductor.
67.	8078 Champoeg Road NE, St. Paul	C4 2-02 00452	Deciduous tree shows evidence of contacting the primary conductor.
68.	Two spans east of the intersection of South College Street and East 14 th Street, Newberg	C3 2-30A 00871	Deciduous tree shows evidence of contacting the primary conductor.
69.	28440 NE Wilsonville Road, Newberg	C3 2-21C 00329	Deciduous tree shows evidence of contacting the primary conductor.
70.	Four spans west of 33895 NE Wilsonville Road, Newberg	C3 2-35 00681	Deciduous tree shows evidence of contacting the primary conductor.
71.	18100 SW Kramien Road, Newberg	C3 1-31 01169	Deciduous trees show evidence of contacting the primary conductor.
72.	14500 SW Bell Road, Sherwood	C3 1-17 01115	Deciduous trees show evidence of contacting the primary conductor.
73.	Three spans east of 13131 SW Bell Road, Sherwood	C3 1-21 02757	Deciduous tree shows evidence of contacting the primary conductor.
74.	Intersection of SW Wilsonville Road and Grahams Ferry Road, Wilsonville	C3 1-21 02622	Deciduous trees show evidence of contacting the primary conductor.

West of Interstate 5 from Sherwood to the Columbia River including Sherwood, Tualatin, Tigard, Beaverton, Garden Home, Aloha, Farmington, North Plains, Hillsboro, Scappoose, Sauvie Island, St Johns, NW Portland east of I-5

75.	14456 NW Gillihan Road, Sauvie Island	B2 1-27 01621	Deciduous tree shows evidence of contacting primary conductors.
76.	15227 NW Gillihan Road, Sauvie Island	B2 1-27 00591	Deciduous tree shows evidence of contacting primary conductors.
77.	15350 NW Gillihan Road, Sauvie Island	B2 1-22C 00590	Deciduous tree shows evidence of contacting primary conductors.
78.	17280 NW Gillihan Road, Sauvie Island	B2 1-14 00196	Evergreen tree shows evidence of contacting primary conductors.
79.	27731 NW Reeder Road, Sauvie Island	B3 1-23 00350	Deciduous tree shows evidence of contacting primary conductors.
80.	20803 NW Reeder Road, Sauvie Island	B2 1-09 00325	Deciduous tree shows evidence of contacting primary conductors.
81.	19606 NW Reeder Road, Sauvie Island	B2 1-09 01101	Deciduous tree shows evidence of contacting primary conductors.
82.	13847 NW Charlton Road, Sauvie Island	B2 1-16 00150	Deciduous tree shows evidence of contacting primary conductors.
83.	18205 NW Reeder Road, Sauvie Island	B2 1-17D 02709	Deciduous tree shows evidence of contacting primary conductors.

84.	17414 NW Lucy Reeder Road, Sauvie Island	B2 1-06 01750	Deciduous tree shows evidence of contacting primary conductors.
85.	17500 NW Lucy Reeder Road, Sauvie Island	B2 1-06 01748	Evergreen tree shows evidence of contacting primary conductors.
86.	Intersection of Highway 30 and King Road, Portland	B2 2-12 00370	Deciduous tree shows evidence of contacting primary conductors.
87.	16305 Rock Creek Road, Portland	B2 2-23 00470	Deciduous tree shows evidence of contacting primary conductors.
88.	25995 Dixie Mountain Road, North Plains	B3 2-28 00058	Evergreen tree shows evidence of contacting primary conductors.
89.	Intersection of Pumpkin Ridge Road and Mead Lane, North Plains	B2 3-25 00562	Deciduous tree shows evidence of contacting primary conductors.
90.	23890 NW Bacona Road, Buxton	B2 4-04 00556	Evergreen tree shows evidence of contacting primary conductors.
91.	23085 NW Fisher Road, Buxton	B2 4-04 00529	Evergreen tree shows evidence of contacting primary conductors.
92.	23505 Vernonia Highway, Buxton	B2 4-04B 00679	Deciduous tree shows evidence of contacting primary conductors.
93.	51215 Staley Road, Buxton	B2 4-05 00699	Deciduous tree shows evidence of contacting primary conductors.
94.	21870 Fisher Road, Buxton	B2 4-09B 00379	Evergreen tree shows evidence of contacting primary conductors.
95.	4678 North Campbell Avenue, Portland	A1 1-21A 00339	Deciduous tree shows evidence of contacting primary conductors.
96.	Intersection of North Going Court and North Concord Avenue, Portland	A1 1-21A 00319	Deciduous tree shows evidence of contacting primary conductors.
97.	4730 North Concord Avenue, Portland	A1 1-21A 00125	Deciduous tree shows evidence of contacting primary conductors.
98.	1650 NW Wygant Street, Portland	A1 1-21A 00328	Deciduous tree shows evidence of contacting primary conductors.
99.	9360 North Columbia Boulevard, Portland	B2 1-36 00381	Deciduous tree shows evidence of contacting primary conductors.
100.	12100 North Portland Road, Portland	A2 1-32D 03387	Deciduous tree shows evidence of contacting primary conductors.
101.	8600 block of North Crawford Street, Portland	B1 1-12B 00209	Deciduous tree shows evidence of contacting primary conductors.
102.	NW Osterman Road 1 span east of Highway 47, Forest Grove	B1 3-19 02123	Evergreen tree shows evidence of contacting primary conductors.
103.	39550 Verboort Road, Forest Grove	B1 3-20 02079	Evergreen tree shows evidence of contacting primary conductors.
104.	39332 Verboort Road, Forest Grove	B1 3-20D 02076	Evergreen tree shows evidence of contacting primary conductors.
105.	39270 Verboort Road, Forest Grove	B1 3-20D 01088	Deciduous tree shows evidence of contacting primary conductors.
106.	7295 Roy Road, Cornelius	B1 3-16 01097	Deciduous tree shows evidence of contacting primary conductors.
107.	9372 Roy Road, Cornelius	B1 3-08 03598	Deciduous tree shows evidence of contacting primary conductors.

108.	42945 Greenville Road, Forest Grove	B1 4-12 02229	Deciduous tree shows evidence of contacting primary conductors.
109.	NE Cornelius-Schefflin Road at Farmside Lane, Cornelius	B1 3-28 04345	Deciduous tree shows evidence of contacting primary conductors.
110.	NE Cornelius-Schefflin Road at Farmside Lane, Cornelius	B1 3-28 04344	Deciduous tree shows evidence of contacting primary conductors.
111.	269 SE 24 th Avenue, Hillsboro	C1 2-5 03670	Deciduous tree shows evidence of contacting primary conductors.
112.	18701 NW Walker Road, Beaverton	B1 2-36A 00852	Deciduous tree shows evidence of contacting primary conductors.
113.	18700 NW Walker Road, Beaverton	B1 2-36A 00851	Deciduous tree shows evidence of contacting primary conductors.
114.	18700 NW Walker Road, Beaverton	B1 2-36A 00850	Deciduous tree shows evidence of contacting primary conductors.
115.	475 Stringtown Road, Forest Grove	C1 4-03 00007	Deciduous tree shows evidence of contacting primary conductors.
116.	4200 Golf Course Road, Cornelius	C1 3-15 00823	Deciduous tree shows evidence of contacting primary conductors.
117.	40390 Dixon Mill Road, Gaston	C1 3-32 01047	Deciduous tree shows evidence of contacting primary conductors.
118.	5870 SW 185 th Avenue, Beaverton	C1 2-18C 04089	Deciduous tree shows evidence of contacting primary conductors.
119.	10139 SW 175 th Avenue, Beaverton	C1 1-31 788	Deciduous tree shows evidence of contacting primary conductors.
120.	16150 SW Division Street, Beaverton	C1 1-14 00168	Deciduous tree shows evidence of contacting primary conductors.
121.	24135 SW Grahams Ferry Road, Tualatin	C3 1-3A 02969	Deciduous tree shows evidence of contacting primary conductors.
122.	22865 SW Chapman Road, Sherwood	C2 2-34 011-29	Deciduous tree shows evidence of contacting primary conductors.
123.	13031 SW Bell Road, Sherwood	C3 1-21 00904	Deciduous tree shows evidence of contacting primary conductors.
124.	2465 SW 87 th Avenue, Portland	C1 1-11A 02384	Deciduous tree shows evidence of contacting primary conductors.
125.	14280 SW 72 nd Avenue, Portland	C2 1-12A 05129	Deciduous tree shows evidence of contacting primary conductors.
126.	5820 SW 41 st Avenue, Portland	D1 1-17C 04569	Deciduous tree shows evidence of contacting primary conductors.
127.	Intersection of Cullen Boulevard and SW 45 th Avenue, Portland	D1 1-17 02065	Deciduous tree shows evidence of contacting primary conductors.
128.	5010 SW Cameron Road, Portland	D1 1-13D 04594	Deciduous tree shows evidence of contacting primary conductors.
129.	5524 SW Cameron Road, Portland	D1 1-18 01242	Deciduous tree shows evidence of contacting primary conductors.
130.	4625 SW 45 th Avenue, Portland	D1 1-18 00896	Deciduous tree shows evidence of contacting primary conductors.

East of Interstate 5 and west of Interstate 205 from West Linn to the Columbia River including West Linn, Clackamas, Gladstone, Lake Oswego, Milwaukie, Sellwood, SE Portland west of Interstate 205

131.	713 SE 17 th Avenue, Portland	D1 1-02A 00215	Deciduous tree shows evidence of contacting the primary conductor.
132.	617 SE 20 th Avenue, Portland	D1 1-02A 00208	Deciduous tree shows evidence of contacting the primary conductor.
133.	738 SE 29 th Avenue, Portland	D1 1-01B 00210	Deciduous tree shows evidence of contacting the primary conductor.
134.	3043 NE Everett Street, Portland	A1 1-36C 00108	Deciduous tree shows evidence of contacting the primary conductor.
135.	1229 SE 55 th Avenue, Portland	D1 2-06A	Deciduous tree shows evidence of contacting the primary conductor.
136.	893 NE Laurelhurst Place, Portland	A1 1-36A 00052	Deciduous tree shows evidence of contacting the primary conductor.
137.	6323 NE Pacific Street, Portland	A1 2-32B 00154	Deciduous tree shows evidence of contacting the primary conductor.
138.	8807 SE Alder Street, Portland	D1 2-04B 00101	Deciduous tree shows evidence of contacting the primary conductor.
139.	1222 SE 87 th Avenue, Portland	D1 2-04B 00035	Deciduous tree shows evidence of contacting the primary conductor.
140.	1334 SE 86 th Avenue, Portland	D1 2-04B 00026	Deciduous tree shows evidence of contacting the primary conductor.
141.	3203 SE 75 th Avenue, Portland	D1 2-08A 00277	Deciduous tree shows evidence of contacting the primary conductor.
142.	3335 SE 75 th Avenue, Portland	D1 2-08A 00165	Deciduous tree shows evidence of contacting the primary conductor.
143.	3011 SE 75 th Avenue, Portland	D1 2-08A 00276	Deciduous tree shows evidence of contacting the primary conductor.
144.	2859 SE 79 th Avenue, Portland	D1 2-08A 00133	Deciduous tree shows evidence of contacting the primary conductor.
145.	2643 SE 74 th Avenue, Portland	D1 2-08A 0070	Deciduous tree shows evidence of contacting the primary conductor.
146.	3406 SE 74 th Avenue, Portland	D1 2-08A 00111	Deciduous tree shows evidence of contacting the primary conductor.
147.	3232 SE 73 th Avenue, Portland	D1 2-08A 00177	Deciduous tree shows evidence of contacting the primary conductor.
148.	3137 SE 58 th Avenue, Portland	D1 2-07A 01292	Deciduous tree shows evidence of contacting the primary conductor.
149.	3316 SE 55 th Avenue, Portland	D1 2-07A 00029	Deciduous tree shows evidence of contacting the primary conductor.
150.	3031 SE 52 nd Avenue, Portland	D1 2-07A 00202	Deciduous tree shows evidence of contacting the primary conductor.
151.	2704 SE 59 th Avenue, Portland	D1 2-07A 00261	Deciduous tree shows evidence of contacting the primary conductor.
152.	1525 SE 51 st Avenue, Portland	D1 2-06C 00493	Deciduous tree shows evidence of contacting the primary conductor.
153.	4803 SE Haig Street, Portland	D1 2-07B 00139	Deciduous tree shows evidence of contacting the primary conductor.

154.	West side of 4506 SE Franklin Street, Portland	D1 2-07B 00305	Deciduous tree shows evidence of contacting the primary conductor.
155.	2905 SE 17 th Avenue, Portland	D1 1-11A 00138	Deciduous tree shows evidence of contacting the primary conductor.
156.	2831 SE 18 th Avenue, Portland	D1 1-11A 00534	Deciduous tree shows evidence of contacting the primary conductor.
157.	5705 SE 48 th Avenue, Portland	D1 2-18 00404	Deciduous tree shows evidence of contacting the primary conductor.
158.	Across the street from 4207 SE 70 th Avenue, Portland	D1 2-08C 00172	Deciduous tree shows evidence of contacting the primary conductor.
159.	8103 SE Center Street, Portland	D1 2-08D 00077	Deciduous tree shows evidence of contacting the primary conductor.
160.	4029 SE 76 th Avenue, Portland	D1 2-08D 00065	Evergreen tree shows evidence of contacting the primary conductor.
161.	3913 SE 74 th Avenue, Portland	D1 2-08D 00124	Two deciduous trees show evidence of contacting the primary conductor.
162.	7211 SE Powell Boulevard, Portland	D1 2-08D 00124	Several deciduous trees show evidence of contacting the primary conductor.
163.	7505 SE Powell Boulevard, Portland	D12 08A 00067	Deciduous tree shows evidence of contacting the primary conductor.
164.	Across the street from 8012 SE Powell Boulevard, Portland	D12 08A 00075	Deciduous tree shows evidence of contacting the primary conductor.
165.	Across the road from 7281 SE Luther Road, Portland	D1 2 29A 02102	Deciduous tree shows evidence of contacting the primary conductor.
166.	6445 SE Alberta Avenue, Portland	D1 2-29 05504	Deciduous tree shows evidence of contacting the primary conductor.
167.	Across the street from 8723 SE 70 th Avenue, Portland	D1 2-29B 03102	Deciduous tree shows evidence of contacting the primary conductor.
168.	Across the street from 804 SE 62 nd Avenue, Portland	D1 2-30A 06114	Deciduous tree shows evidence of contacting the primary conductor.
169.	5626 SE Lexington Street, Portland	D1 2-19 01079	Evergreen tree shows evidence of contacting the primary conductor.
170.	5414 SE Ogden Street, Portland	D1 2-19 00085	Deciduous tree shows evidence of contacting the primary conductor.
171.	5711 SE Ogden Street, Portland	D1 2-19 00905	Deciduous tree shows evidence of contacting the primary conductor.
172.	5747 SE Ogden Street, Portland	D1 2-19A 00025	Deciduous tree shows evidence of contacting the primary conductor.
173.	5533 SE Knapp Street, Portland	D1 2-19A 01853	Deciduous tree shows evidence of contacting the primary conductor.
174.	6025 SE Henderson Street, Portland	D1 2-19 02301	Deciduous tree shows evidence of contacting the primary conductor.
175.	6506 SE 44 th Avenue, Portland	D1 2-19B 00226	Deciduous tree shows evidence of contacting the primary conductor.
176.	4206 SE Martins Street, Portland	D1 2-18C 00149	Deciduous tree shows evidence of contacting the primary conductor.
177.	4234 SE 42 nd Avenue, Portland	D1 2-19B 00014	Deciduous tree shows evidence of contacting the primary conductor.

178.	7417 SE 50 th Avenue, Portland	D1 2-19 07417	Deciduous tree shows evidence of contacting the primary conductor.
179.	Across the street from 4514 SE Flavel Drive, Portland	D1 2-19B 05331	Deciduous tree shows evidence of contacting the primary conductor.
180.	4553 SE Malden Drive, Portland	D1 2-19C 01735	Deciduous tree shows evidence of contacting the primary conductor.
181.	4909 SE Malden Drive, Portland	D1 2-19 00041	Deciduous tree shows evidence of contacting the primary conductor.
182.	7806 SE 42 nd Avenue, Portland	D1 2-19C 00207	Two deciduous trees show evidence of contacting the primary conductor.
183.	5848 SE 18 th Avenue, Portland	D1 1-14D 00264	Deciduous tree shows evidence of contacting the primary conductor.
184.	On SE Tolman Street at the intersection with SE 17 th Avenue, Portland	D1 1-14D 00099	Deciduous tree shows evidence of contacting the primary conductor.
185.	2324 SE Umatilla Street, Portland	D1 1-24C 00346	Deciduous tree shows evidence of contacting the primary conductor.
186.	On SE Overland Street east of the intersection with SE 75 th Avenue, Portland	D1 2-29D 12437	Deciduous tree shows evidence of contacting the primary conductor.
187.	8004 SE Overland Street, Portland	D1 2-29 03558	Deciduous tree shows evidence of contacting the primary conductor.
188.	7901 SE Lamphier Street, Portland	D1 2-29D 14824	Deciduous tree shows evidence of contacting the primary conductor.
189.	7761 78 th Avenue, Portland	D1 2-29D 01547	Deciduous tree shows evidence of contacting the primary conductor.
190.	7705 SE Lamphier Street, Portland	D1 2 29D 02688	Deciduous tree shows evidence of contacting the primary conductor.
191.	7603 SE Lamphier Street, Portland	D1 2-29D 02381	Deciduous tree shows evidence of contacting the primary conductor.
192.	9608 SE 74 th Avenue, Portland	D1 2-29 02386	Deciduous tree shows evidence of contacting the primary conductor.
193.	Across the road from 8462 SE Clackamas Road, Portland	D2 2-09 03211	Deciduous tree shows evidence of contacting the primary conductor.
194.	6320 SE Hull Avenue, Portland	Not available	Deciduous tree shows evidence of contacting the primary conductor.
195.	17986 SE Jennings Avenue, Portland	D2 2-18C 02776	Deciduous tree shows evidence of contacting the primary conductor.
196.	13709 SE Laurie Avenue, Portland	D2 1-02 04491	Deciduous tree shows evidence of contacting the primary conductor.
197.	14325 SE River Road, Portland	D2 1-02D 02222	Deciduous tree shows evidence of contacting the primary conductor.
198.	15574 SE Creswain Avenue, Portland	D2 1-12 08512	Deciduous tree shows evidence of contacting the primary conductor.
199.	15834 SE Watson Place, Portland	D2 1-12 05589	Deciduous tree shows evidence of contacting the primary conductor.
200.	2710 SE Concord Road, Portland	D2 1-12D 04497	Deciduous tree shows evidence of contacting the primary conductor.

201.	16808 SE Blanton Street, Portland	D2 1-13 03650	Deciduous tree shows evidence of contacting the primary conductor.
202.	3525 SE Vineyard Road, Portland	D2 1-12D 03644	Deciduous tree shows evidence of contacting the primary conductor.
203.	2715 Jolie Point Road, West Linn	D2 1-24C 02795	Deciduous tree shows evidence of contacting the primary conductor.
204.	18406 Nixon Avenue, West Linn	D2 1-13C 03658	Deciduous tree shows evidence of contacting the primary conductor.
205.	2551 Robinwood Way, West Linn	D2 1-14D 03768	Deciduous tree shows evidence of contacting the primary conductor.
206.	2875 Marylhurst Drive, West Linn	D2 1-14 03606	Deciduous tree shows evidence of contacting the primary conductor.
207.	3335 SW Childs Road, Lake Oswego	D2 1-20 08612	Deciduous tree shows evidence of contacting the primary conductor.
208.	304 Sixth Street, Lake Oswego	D2 1-03D 30057	Deciduous tree shows evidence of contacting the primary conductor.
209.	Four spans south of 11900 SW Boones Ferry Road, Lake Oswego	Not available	Several deciduous trees show evidence of contacting the primary conductor.
210.	On SW Palatine Hill Road at the intersection with SW Comus Street, Lake Oswego	D1 1-34A 00374	Deciduous tree shows evidence of contacting the primary conductor.
211.	On SW Terwilliger Boulevard at the intersection with Castleridge Drive, Lake Oswego	D1 1-34D 04045	Deciduous tree shows evidence of contacting the primary conductor.

East of Interstate 5 from Silverton to Canby including Silverton, Mt. Angel, Monitor, Gervais, Woodburn, Molalla, Colton, Hubbard, Aurora, Canby, Mulino, Beaver Creek, Estacada

212.	325 5 th Street, Gervais	C5 2-26B 00654	Deciduous tree shows evidence of contacting primary conductors.
213.	Two spans east of 9333 Mt. Angel-Gervais Road, Gervais	C5 2-36 01442	Several deciduous trees show evidence of contacting primary conductors
214.	11091 Saratoga Road, west of Mt. Angel	C6 1-08 01685	Deciduous tree shows evidence of contacting primary conductors
215.	11705 Monitor-McKee Road, west of Mt. Angel	C5 1-28 02075	Deciduous tree shows evidence of contacting primary conductors.
216.	13905 Monitor-McKee Road, Monitor	C5 1-26 00092	Deciduous tree shows evidence of contacting primary conductors.
217.	14985 Monitor-Woodburn Road, Monitor	C5 1-25 39017	Deciduous tree shows evidence of contacting primary conductors.
218.	12525 Meridian Road, Monitor	C5 1-25 01838	Deciduous tree two spans east of this pole show evidence of contacting primary conductors.
219.	12297 Meridian Road, Monitor	C5 1-36 01732	Deciduous tree shows evidence of contacting primary conductors.
220.	3701 Drift Creek Road, south of Silverton	D8 1-08 00105	Deciduous tree shows evidence of contacting primary conductors.
221.	1737 Victor Point Road, south of Silverton	C7 1-24 01234	Deciduous tree shows evidence of contacting primary conductors.

222.	1248 Victor Point Road, south of Silverton	C7 1-24 01231	Deciduous tree shows evidence of contacting primary conductors.
223.	Victor Point Road, two spans north of Riches Road, south of Silverton	C7 1-36 00879	Deciduous tree shows evidence of contacting primary conductors.
224.	13684 Riches Road, south of Silverton	C7 1-35 00261	Deciduous tree shows evidence of contacting primary conductors.
225.	14934 Silver Falls Highway, north of Sublimity	C8 1-24 00439	Deciduous tree shows evidence of contacting primary conductors.
226.	5765 Anderson Road, north of Sublimity	C8 1-16 00391	Deciduous tree shows evidence of contacting primary conductors.
227.	5765 Anderson Road, north of Sublimity	C8 1-16 00482	Deciduous tree shows evidence of contacting primary conductors.
228.	5336 Anderson Road, north of Sublimity	C8 1-16 00125	Deciduous tree shows evidence of contacting primary conductors.
229.	4182 Cascade Highway, north of Sublimity	C8 1-10 00262	Several deciduous trees show evidence of contacting primary conductors.
230.	3535 Edison Road, south of Silverton	C7 1-11 00809	Deciduous tree shows evidence of contacting primary conductors.
231.	2370 Victor Point Road, south of Silverton	C7 1-13 01812	Deciduous tree shows evidence of contacting primary conductors.
232.	2385 Lorence Road, south of Silverton	C7 1-24 00839	Deciduous tree shows evidence of contacting primary conductors.
233.	1980 Silver Creek Falls Highway, east of Silverton	C7 1-28 00147	Several deciduous trees show evidence of contacting primary conductors.
234.	6677 Highway 213, north of Silverton	D6 1-30 00238	Several deciduous trees show evidence of contacting primary conductors.
235.	17124 South Abiqua Road, north of Silverton	D6 1-29 00337	Several deciduous trees show evidence of contacting primary conductors.
236.	18614 South Abiqua Road, north of Silverton	D6 1-34 00527	Evergreen tree shows evidence of contacting primary conductors.
237.	35411 South Farm Road, near Yoder	D5 1-32 00473	Several deciduous trees show evidence of contacting primary conductors, in both spans.
238.	7487 Oster Road, near Yoder	D5 1-32 00326	Deciduous tree shows evidence of contacting primary conductors.
239.	8233 Monte Cristo Road, near Yoder	D5 1-28 01413	Evergreen tree shows evidence of contacting primary conductors.
240.	One span north of 33532 South Kropf Road, near Yoder	D5 1-21 00058	Deciduous tree shows evidence of contacting primary conductors.
241.	8515 South Schneider Road, near Yoder	D5 1-16 01300	Deciduous tree shows evidence of contacting primary conductors.
242.	5773 South Schneider Road, east of Woodburn	D5 1-13 02326	Deciduous tree shows evidence of contacting primary conductors.
243.	1621 West Hayes Street, Woodburn	C51 07C 00698	Deciduous tree shows evidence of contacting primary conductors.
244.	Highway 211, .3 mile west of Pudding River Road, Woodburn	Not available	Deciduous tree shows evidence of contacting primary conductors on single phase road crossing.

245.	Intersection Kiliam Road and Union School Road, Woodburn	C5 1-10 02344	Several deciduous trees show evidence of contacting primary conductors.
246.	Two spans north of intersection Kiliam Road and Union School Road, Woodburn	C5 1-10 02345	Deciduous tree shows evidence of contacting primary conductors.
247.	13206 Kiliam Loop Road, Woodburn	C5 1-10 01312	Deciduous tree shows evidence of contacting primary conductors.
248.	13365 Kiliam Loop Road, Woodburn	C5 1-10 00967	Deciduous tree shows evidence of contacting primary conductors.
249.	15417 Union School Road, Woodburn	C5 1-15 02282	Deciduous tree shows evidence of contacting primary conductors.
250.	3221 Meridian Road, east of Woodburn	C5 1-13 01992	Deciduous tree shows evidence of contacting primary conductors.
251.	5011 South Elliot Prairie Road, Woodburn	C5 1-21 03733	Two deciduous trees show evidence of contacting primary conductors.
252.	Intersection Barlow Road and Highway 214, east of Woodburn	D5 1-07 00751	Deciduous tree shows evidence of contacting primary conductors.
253.	Two spans north of intersection Barlow Road and Highway 214, east of Woodburn	D5 1-07 01206	Deciduous tree shows evidence of contacting primary conductors.
254.	908 Molalla Avenue, Molalla	D 5 2-04 00021	Several deciduous trees show evidence of contacting primary conductors.
255.	13258 Vick Road, Molalla	D5 2-05 01238	Deciduous tree shows evidence of contacting primary conductors.
256.	1680 Toliver Road, Molalla	D5 2-07 00989	Two evergreen trees show evidence of contacting primary conductors.
257.	12580 Liberal Way, near Liberal	D4 2-30 00210	Deciduous tree shows evidence of contacting primary conductors.
258.	8921 Barnards Road, west of Molalla	D4 1-33 02570	Deciduous tree shows evidence of contacting primary conductors.
259.	30250 Molalla Avenue, Molalla	D5 2-04B 00566	Evergreen tree shows evidence of contacting primary conductors.
260.	30286 Molalla Avenue, Molalla	D5 1-04 02446	Deciduous tree shows evidence of contacting primary conductors.
261.	30110 Sprague Road, Molalla	D5 2-04 01068	Deciduous tree shows evidence of contacting primary conductors.
262.	15165 Highway 211, Molalla	D5 2-10 00543	Deciduous tree shows evidence of contacting primary conductors.
263.	30637 Highway 213, Molalla	D5 1-06 00404	Deciduous tree shows evidence of contacting primary conductors.
264.	12010 Carus Road, near Carus	D3 2-31 00701	Deciduous tree shows evidence of contacting primary conductors.
265.	12473 South Mulino Road, near Mulino	D4 2-18 00945	Deciduous tree shows evidence of contacting primary conductors.
266.	31068 Wright Road, east of Molalla	D5 2-11 02795	Evergreen tree shows evidence of contacting primary conductors.
267.	34133 Dickey Prairie Road, east of Molalla	D5 2-26 00157	Evergreen tree shows evidence of contacting primary conductors.

268.	21915 Green Mountain Drive, Colton	D5 3-10 01068	Evergreen tree shows evidence of contacting primary conductors.
269.	25559 South Elwood Road, south of Estacada	D4 4-29 00555	Evergreen tree shows evidence of contacting primary conductors.
270.	27250 SE Eagle Creek Road, Estacada	D3 4-08 00811	Evergreen tree shows evidence of contacting primary conductors.
271.	35742 Snuffin Road, Estacada	D3 4-15 03762	Three deciduous trees show evidence of contacting primary conductors.

East of Interstate 205 from Oregon City to the Columbia River including Oregon City, Damascus, Boring, Sandy, Welches, Wemme, Happy Valley, SE Portland east of Interstate 205, Gresham

272.	19555 Leland Road, Oregon City	D3 2-07 06869	Evergreen tree shows evidence of contacting primary conductors.
273.	25665 Beaver creek Road, near Clarkes	D4 3-07 05969	Deciduous tree shows evidence of contacting primary conductors.
274.	25890 Beaver creek Road, near Clarkes	D4 3-08 05976	Deciduous tree shows evidence of contacting primary conductors.
275.	26340 Beaver creek Road, near Clarkes	D4 3-17 05983	Deciduous tree shows evidence of contacting primary conductors.
276.	15635 SE 202 nd Avenue, Damascus	D2 3-08 01486	Several deciduous trees show evidence of contacting primary conductors.
277.	18205 Troge Road, north of Damascus	D1 3-31D 00002	Deciduous tree shows evidence of contacting primary conductors.
278.	19404 SE Foster Road, north of Damascus	D1 3-32 00370	Deciduous tree shows evidence of contacting primary conductors.
279.	22592 Hoffmeister Road, north of Damascus	D2 3-303 00413	Deciduous tree shows evidence of contacting primary conductors.
280.	23460 Borges Road, north of Damascus	D1 3-27 00255	Deciduous tree shows evidence of contacting primary conductors.
281.	17175 SE Sager Road, north of Damascus	D1 3-30 07267	Two deciduous trees show evidence of contacting primary conductors.
282.	16710 SE Foster Road, north of Damascus	D1 3-19 00576	Deciduous tree shows evidence of contacting primary conductors.
283.	8809 SE 190 th Avenue, south of Gresham	D1 3-29 00491	Deciduous tree shows evidence of contacting primary conductors.
284.	Intersection SE Cheldelin Road and SE Turel Avenue, south of Gresham	D1 3-29B 07493	Several deciduous trees show evidence of contacting primary conductors.
285.	37000 Highway 26, Sandy	D2 4-14 02667	Several deciduous trees show evidence of contacting primary conductors.
286.	43160 Keisecker Road, Sandy	D2 5-32 02209	Deciduous tree shows evidence of contacting primary conductors.
287.	41805 SE Pagh Road, Sandy	D2 5-03 01889	Deciduous tree shows evidence of contacting primary conductors.
288.	Intersection SE Knapp Street and SE 112 th Avenue, SE Portland	D1 2-22B 03570	Deciduous tree shows evidence of contacting primary conductors.
289.	11635 SE Lexington Street, SE Portland	D1 2 22D 07184	Deciduous tree shows evidence of contacting primary conductors.

290.	11830 SE Flavel Street, SE Portland	D1 2-22A 04365	Deciduous tree shows evidence of contacting primary conductors.
291.	Intersection SE Knapp Street and SE 112 th Avenue, SE Portland	D1 2-22 00059	Deciduous tree shows evidence of contacting primary conductors.
292.	35341 SE Hauglum Road, west of Sandy	D1 4-34 02032	Several deciduous trees show evidence of contacting primary conductors.
293.	29205 Highway 212, Boring	D1 4-31 01703	Deciduous tree shows evidence of contacting primary conductors.
294.	29195 Highway 212, Boring	D1 4-31 03292	Evergreen tree shows evidence of contacting primary conductors.
295.	In front of US Post Office on Highway 212, Boring	D1 4-31C 00005	Deciduous tree shows evidence of contacting primary conductors.
296.	29360 SE Lariat Lane, Boring	D1 4-31 00213	Deciduous tree shows evidence of contacting primary conductors.
297.	7215 SE Altman Road, Gresham	D1 4-21 02653	Deciduous tree shows evidence of contacting primary conductors.
298.	Intersection SE Lusted Road and SE Clare Road, Gresham	D1 4-20 00738	Deciduous tree shows evidence of contacting primary conductors.
299.	29368 SE Chase Road, Gresham	D1 4-18 00134	Deciduous tree shows evidence of contacting primary conductors.
300.	7900 SE Pleasant Home Road, Gresham	D1 4-20 01519	Deciduous tree shows evidence of contacting primary conductors.
301.	12681 SE 272 nd Avenue, Boring	D2 3-01 01287	Deciduous tree shows evidence of contacting primary conductors.
302.	Intersection of SW 60 th Avenue and SW Advance Road, Wilsonville	D3 1-18 01737	Deciduous tree shows evidence of contacting the primary conductor.
303.	5851 SW Kahle Road, Wilsonville	D3 1-07 00609	Deciduous tree shows evidence of contacting the primary conductor.
304.	4323 SW Advance Road, Wilsonville	D3 1-08 00869	Deciduous tree shows evidence of contacting the primary conductor.
305.	25200 SW 65 th Avenue, Wilsonville	C3 1-06 00423	Deciduous tree shows evidence of contacting the primary conductor.
306.	12707 NE San Rafael Street, Portland	A1 2-26 05110	Deciduous tree shows evidence of contacting the primary conductor.
307.	2424 NE 132 nd Avenue, Portland	D1 2-26 07178	Deciduous tree shows evidence of contacting the primary conductor.
308.	Behind 18063 SE Division Street, Portland	D1 3-06 05390	Deciduous tree shows evidence of contacting the primary conductor.
309.	Behind 17123 SE Taylor Street, Portland (Alder school)	Two spans west of D1 3-6B/05259	Two evergreen trees show evidence of contacting the primary conductor.
310.	Behind 16959 SE Taylor Street, Portland (Alder school)	Four spans west of D1 3-06B/5259	Two deciduous trees show evidence of contacting the primary conductor.
311.	Behind 752 SE Taylor Drive, Portland (Alder school)	Not available	Deciduous tree shows evidence of contacting the primary conductor.
312.	15847 SE Stark Street, Portland	A1 2-36D 05571	Deciduous tree shows evidence of contacting the primary conductor.

313.	1400 SE 174 th Avenue, Portland	D1 3-06 01575	Several deciduous trees show evidence of contacting the primary conductor.
314.	1135 SE 167 th Avenue, Portland	D1 3-06B 05336	Deciduous tree shows evidence of contacting the primary conductor.
315.	Behind 16814 SE Rhine Street, Portland	Three spans east of D1 3-7/04224	Deciduous tree shows evidence of contacting the primary conductor.
316.	1750 NE 201 st Avenue, Portland	A1 3-29D 01107	Deciduous tree shows evidence of contacting the primary conductor.
317.	405 Main Street, Fairview	A1 3-28D 01246	Deciduous tree shows evidence of contacting the primary conductor.
318.	350 Lincoln Street, Fairview	A1 3-28 01601	Deciduous tree shows evidence of contacting the primary conductor.
319.	Intersection of NE 223 rd Avenue and NE Halsey Street, Fairview	A1 3-28D 02114	Several deciduous trees show evidence of contacting the primary conductor.
320.	22701 NE Halsey Street, Fairview	A1 3-27C 02126	Several deciduous trees show evidence of contacting the primary conductor.
321.	22701 NE Halsey Street, Fairview	A1 3-27C 01619	Several deciduous trees show evidence of contacting the primary conductor.
322.	Intersection of NE Halsey Street and NE 230 th Court, Fairview	A1 3-27 01426	Several deciduous trees show evidence of contacting the primary conductor.
323.	Intersection of NE Halsey Street and NE 240 th Avenue, Fairview/Wood Village	A1 3-27D 1866	Deciduous tree shows evidence of contacting the primary conductor.
324.	892 SW Halsey Loop, Troutdale	A1 3-26 2135	Deciduous tree shows evidence of contacting the primary conductor.

C. Citation:	Obstructions on pole such as vines, nails, tacks and through bolts not properly trimmed create a climbing hazard.		
Reference:	NESC Rule Number: 217A4		
	<i>Locations</i>	<i>Pole Numbers</i>	<i>Comments</i>
1.	7306 SE Main Street, Portland	D1 2-05A 00162	Vine growing up sidewalk guy to power supply neutral, creating a hazard.
2.	Intersection SE Rural Street and SE 14 th Avenue, Portland	D1 1-14D 00099	Vines are growing up pole to secondary level, creating a hazard.
3.	550 SE Barton Avenue, Portland	D2 2-19 07752	Vines are growing up pole to top of transformer, creating a hazard.
4.	16105 SE Southview Avenue, Portland	D2 1-12D 03028	Vines are growing up pole to bottom of transformer, creating a hazard.
5.	13825 NW Charlton Road, Sauvie Island	B2 1-16 01012	Vines growing up down guy to primary level, creating a hazard.
6.	705 Stringtown Road, Forest Grove	B1 4-34 00204	Vines growing up down guy into primary level, creating a hazard.

D. Citation:	Abandoned power supply conductor appears to be abandoned without adequate maintenance.		
Reference:	NESC Rules Number: 012C and 214B3		
	<i>Locations</i>	<i>Pole Numbers</i>	<i>Comments</i>
1.	SW Hardebeck Road at intersection with SW Dixon Mill Road, three spans to the north ending at 10660 Hardebeck Road, Gaston	Between C14 36 4420 and C14 36 1919	Trees are growing up through the phases on de-energized primary. If these facilities are no longer in service they must be maintained in a safe condition or removed. P46

REMARKS (By OPUC Representative)

OPUC Staff recently performed the annual review of PGE's vegetation management program. This occurred in the communities listed within the body of the report. The review was performed primarily during the month of August, 2014. In conducting this review, Staff visited multiple areas within PGE's service territory in order to determine the effectiveness of PGE's vegetation management program in different geographic and demographic conditions.

Staff observed 353 locations where evidence existed of contact between vegetation and primary electrical conductors. A breakdown of the locations follows:

- Twenty-two of those are readily climbable trees.
- Six of the locations involve vines that have grown up poles and guy wires until they are touching, or about to touch, energized primary conductors. These and the readily climbable trees are considered to be hazards.
- One involves a situation where the primary conductor is still in place, but had breakers cut into each end, creating a de-energized span, however the span needs to be maintained or removed.
- The remaining 324 locations involve trees that should have been trimmed during the normal cycle. It should again be noted that many of the listed locations involve multiple trees in contact with primary conductors.

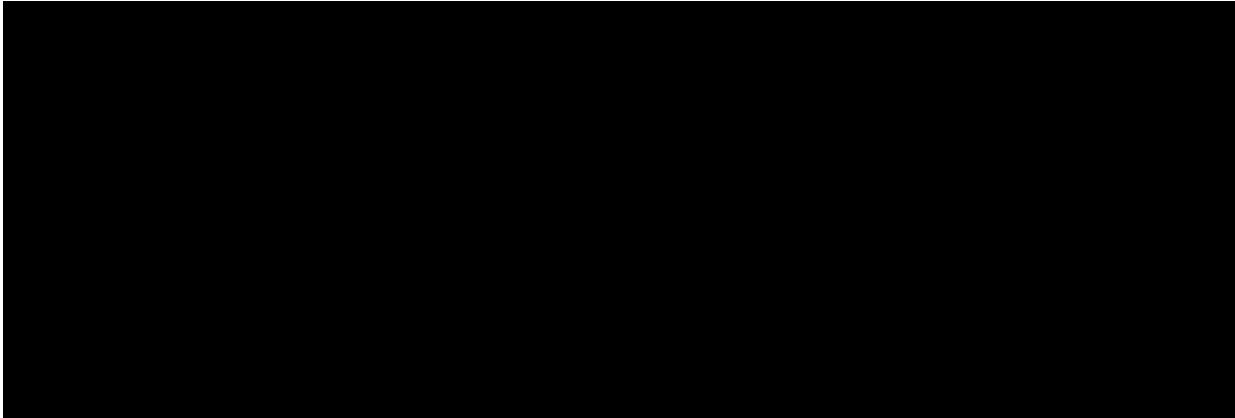
Staff recognizes that the overall numbers appeared to trend downward since 2010, although this year represents a slight uptick from 2013. Staff continues to believe that this number of violations can be eliminated by obtaining a greater clearance when trimming, or by transitioning to shorter cycle-periods to ensure that end-of-cycle clearances do not violate the minimum clearance requirements stated in OAR 860-024-0016.

RECOMMENDATIONS: The OPUC staff recommends that PGE perform the following actions:

1. On or before October 15, 2014, submit written correspondence confirming correction of the probable violations related to readily climbable trees, as well as those listed specifically as hazardous conditions.
2. On or before March 17, 2015, submit written correspondence confirming correction of the remaining probable violations cited in this report.

Prepared by: _____

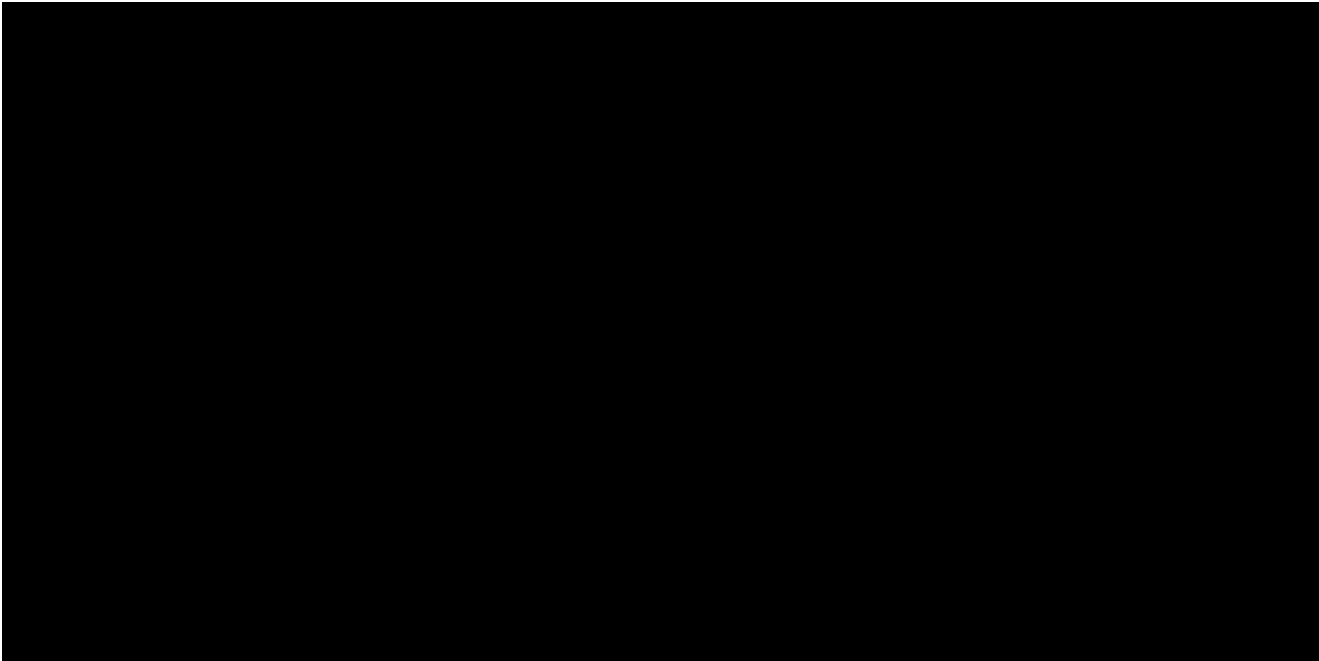
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7 **Q. How does variability in weather and growing conditions affect PGE’s RVM program?**

8 A. Growing conditions change seasonally and vary year-by-year. For example, a warmer and
9 wetter spring can lead to above-average tree growth starting earlier in the season. In addition,
10 during extremely hot temperatures (e.g., over 100 degrees), power lines sag which impacts
11 the proximity of vegetation. Depending on when OPUC Safety Staff conduct their audits,
12 these circumstances could impact their observations of possible violations.

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¹⁶ Staff/2000, Stevens/24 at 4-18.

¹⁷ *Id.* at 6-7.

¹⁸ *Id.* at Table 3.

1 **Q. What type of methodology would you expect Safety Staff to employ when identifying**
2 **and citing probable vegetation violations given that the number of those citations would**
3 **have a direct financial impact on PGE?**

4 A. We would expect Safety Staff to employ a transparent, consistent, and statistically valid
5 methodology to audit PGE’s system. The same methodology and metrics would be repeatable
6 and used each year, thus enabling accurate year-to-year comparisons to determine whether
7 PGE is trending positively or negatively.

8 **Q. Based on the record developed in this proceeding, does Safety Staff use a statistically**
9 **valid, repeatable, and transparent methodology with consistent metrics that enable**
10 **accurate year-over-year comparisons?**

11 A. No. In discovery, we asked Staff to provide all internal policies and procedures, guidelines,
12 or checklists detailing the audit requirement and methodology to be followed by OPUC Safety
13 Staff when performing audits to identify probable vegetation management violations,
14 including the methodology by which Safety Staff selects which area(s) of PGE’s system to
15 audit at a given time. Staff provided no documentation of any internal policies and procedures,
16 guidelines, or checklists detailing the audit requirement and methodology followed by Safety
17 Staff.²³

18 It does not appear that Safety Staff chooses which parts of PGE’s system to audit based on
19 a statistically valid random sample survey. Rather, “OPUC’s vegetation audits consist of a
20 target to spot check the entirety of the system, however, access limitations that could be the
21 result of weather, fires, road construction or other unplanned events can limit access to a

²³ See, PGE/2201, Bekkedahl-Putnam/2 (OPUC Response to PGE Data Request No. 28).

1 particular area.”²⁴ The record also shows that Safety Staff do not track the number of line-
2 miles audited²⁵ or the number of hours spent auditing.²⁶

3 **Q. Staff contends that PGE “mischaracterize[d] OPUC’s data request responses”**
4 **regarding the rigor of OPUC Safety Staff’s audit process and provided additional detail**
5 **regarding its audit process in rebuttal testimony.²⁷ Did the additional detail provided by**
6 **Staff address your concerns about the rigor and transparency of Safety Staff’s auditing**
7 **process?**

8 A. No. Unfortunately, Staff only describes the documentation undertaken,²⁸ not the methodology
9 employed to determine which parts of the system are audited to make sure they are a
10 statistically representative sampling. Staff seems to assert that “its substantial history of
11 audits” means there is rigor and consistency to Safety Staff’s annual audits. We disagree.
12 Just because numerous audits have occurred does not mean they were conducted via a
13 transparent, documented, and statistically valid sampling methodology with consistently
14 applied metrics. For example, if in one year, Safety Staff utilized a team of three to cover 500
15 line miles of PGE’s system and then next year only an average of two team members were
16 available to conduct the audits and could only cover 300 line miles, it is fair to conclude that
17 more probable violations would be identified in the first year than the second. For such metrics
18 to be used to determine cost recovery, there must be consistency from year-to-year for a valid
19 comparison to be made. Importantly, even if OPUC Safety Staff were to adopt a statistically

²⁴ See, PGE/2201, Bekkedahl-Putnam/2 (OPUC Response to PGE Data Request No. 28).

²⁵ See, *Id.*/5 (OPUC Response to PGE Data Request No. 37).

²⁶ See, *Id.*/4 (OPUC Response to PGE Data Request No. 36).

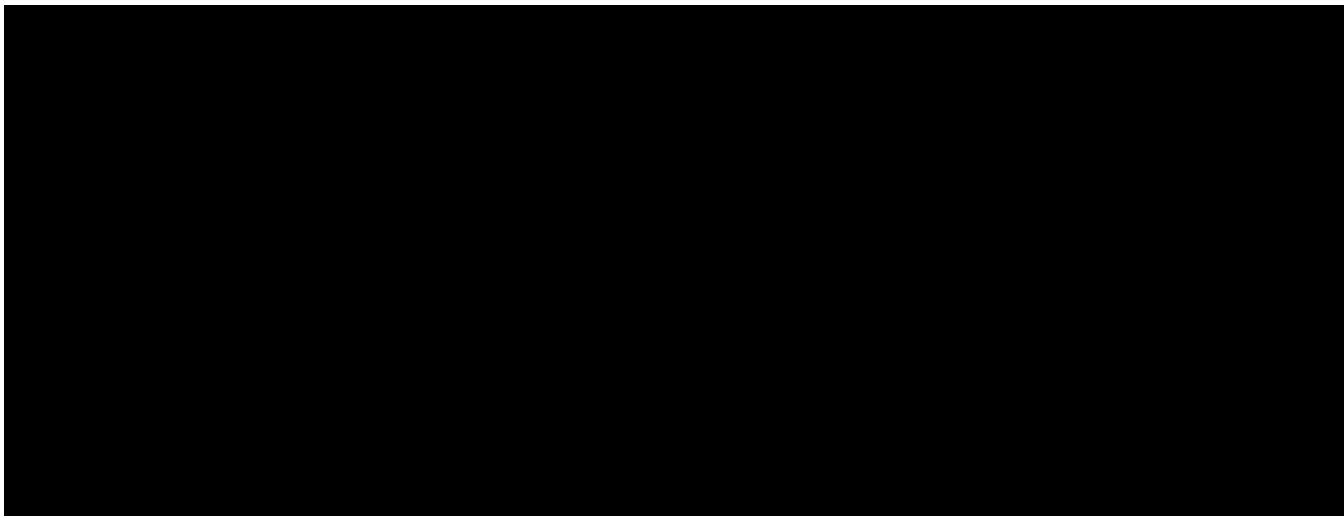
²⁷ Staff/3300, Stevens/9 at 6-10.

²⁸ “Staff documents every observation of contact, provides photographic support, and [...] has also included geolocation [...]” (Staff/3300, Stevens/10 at 2-4). We do not question that Safety Staff provides documentation of its audit results. What we have not seen is evidence that Safety Staff employs a consistent and statistically valid sampling methodology to audit PGE’s system.

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Putnam – Ferchland / 15**

1 valid, transparent and repeatable audit methodology with clearly defined and consistently
2 applied metrics to provide year-over-year comparisons, it would need to be in effect for
3 several years to establish a baseline against which to set any sort of thresholds.

4 Staff also says that PGE mischaracterized their data request response that says OPUC
5 Safety Staff performs a “spot check” of PGE’s system.²⁹ To be clear, the terms “spot check”
6 and “spot checks” are used in Staff responses to PGE Data Request Nos. 28 and 37.³⁰ Staff
7 says that the OPUC “evaluates the system-wide performance of PGE’s vegetation program
8 and, except for areas which may be inaccessible for a variety of reasons, completes a system-
9 wide analysis of the program.”³¹ However, Staff provides no documentation that a statistically
10 valid, random sampling methodology is used to ensure a system-wide analysis is achieved.



²⁹ Staff/3300, Stevens/10 at 4-6.

³⁰ See, PGE/2201, Bekkedahl-Putnam/1(OPUC Response to PGE Data Request No. 28) and *Id.*/5 (OPUC Response to PGE Data Request No. 37).

³¹ Staff/3300, Stevens/10 at 6-8.

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Date: July 7, 2023

TO:

JAKI FERCHLAND
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pge.opuc.filings@pgn.com;

For Megan Stratman

FROM: Bret Stevens
Senior Economist
Rates, Safety and Utility Performance Program

OREGON PUBLIC UTILITY COMMISSION
Docket No. UE 416 - PGE Data Request filed June 23, 2023

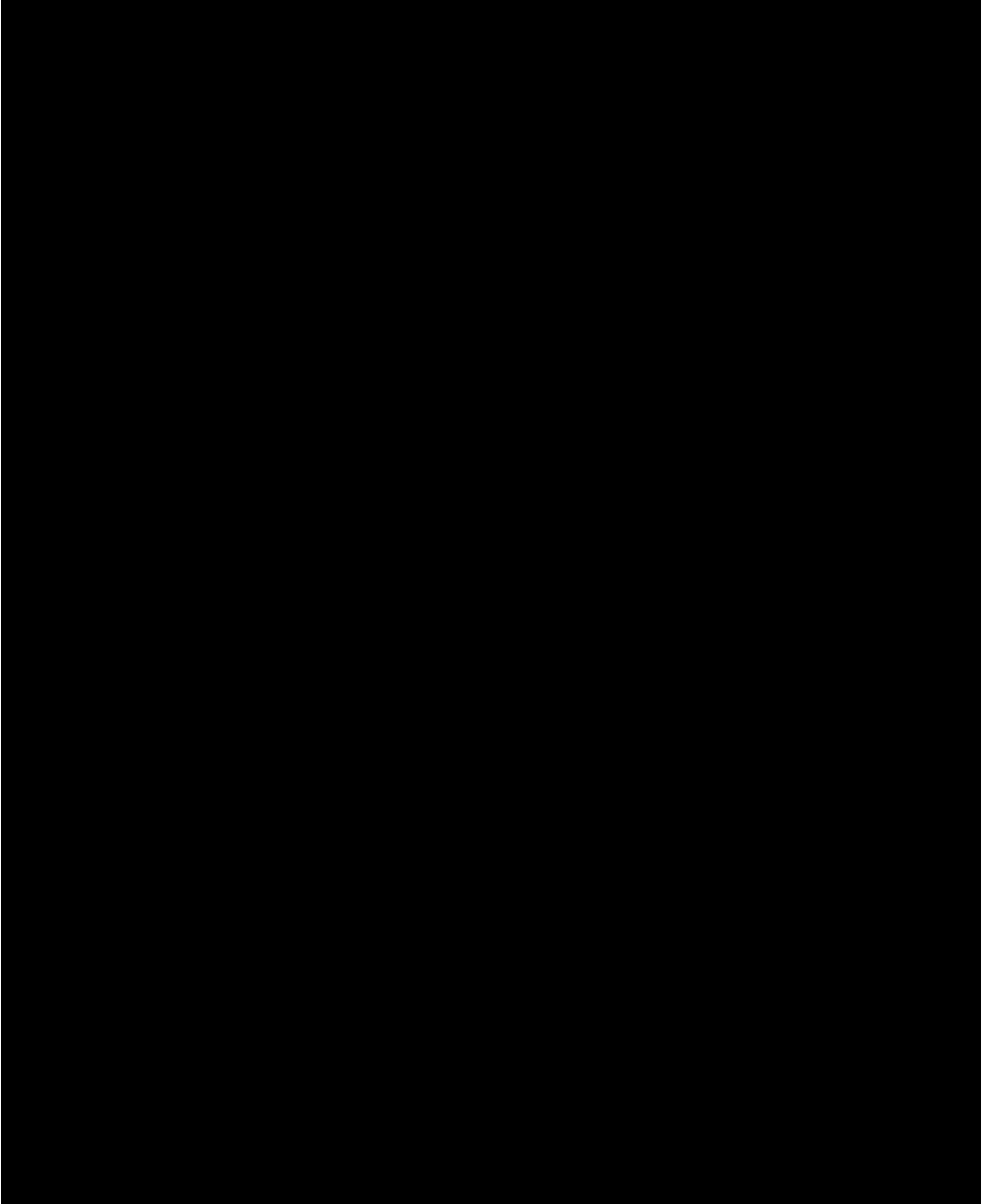
PGE Data Request No 28:

28. Referring to OPUC's safety audit program and its identification of probable vegetation management violations discussed in Staff/2000, Stevens/26 at 9:
- a. For each of the last 10 years, please provide all training and education materials provided to OPUC Safety Staff to identify probable vegetation management violations.
 - b. Please describe all qualifications, licenses, or other education and training required of OPUC Safety Staff who perform audits to identify probable vegetation management violations.
 - c. Please describe all qualifications, licenses, or other education and training received by current OPUC Safety Staff who perform audits to identify probable vegetation management violations.
 - d. Please provide all internal policies and procedures, guidelines, or checklists detailing the audit requirements and methodology to be followed by OPUC Safety Staff when performing audits to identify probable vegetation management violations, including:
 - i. Frequency of audits
 - ii. Duration of audits
 - iii. Methodology to select which area(s) of PGE's system to audit at a given time
 - iv. Tools, equipment, and technology used to identify probable violations.
 - e. Does OPUC Safety Staff coordinate the timing and/or geographical area of its audit with PGE's planned trim schedule? If yes, please explain how this coordination occurs. If no, please explain why not.
 - f. Please describe the process and frequency with which the OPUC Safety Staff methodology(ies) to identify probable vegetation management violations are updated consistent with the best available science and industry best practices.

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OPUC Response No 28:

- a. Electric Safety Staff's training consist of previous work experience, reviewing legacy audit reports and pictures (for both vegetation and NESC audits), extensive one-on-one field training with experienced Staff, participation and leadership in OJUA training and subcommittees.
- b. All past and present OPUC Safety Staff have extensive NESC compliance experience covering construction, maintenance and inspections of electric supply facilities.
- c. See response b above.
- d. See responses to part d below:
 - i. Annually, performed during the beginning of summer.
 - ii. Information on duration of each audit can be found in the summary section of each audit report.
 - iii. The OPUC's vegetation audits consist of a target to spot check the entirety of the system, however access limitations that could be the result of weather, fires, road construction or other unplanned events can limit access to a particular area.
 - iv. Safety Staff tools and technology have evolved over the period requested however at this time they use binoculars, cameras, mobile data tools (i.e. digital maps and digital recording methods) as well as vehicles to perform the audits. As identified above, they utilize the approved version of the NESC as adopted in Oregon Administrative Rules, as well as the relevant OAR, 860-024 with its pertinent subsections.
- e. No; as stated previously OPUC Safety Staff are evaluating the entirety of the program and coordination is not relevant for a spot check of performance through the cycles.
- f. OPUC Safety Staff compares operator vegetation performance against Oregon Administrative Rules, specifically Division 24, which serve as the foundation for determining violations, thus other science and industry best practices is not generally relevant. Nevertheless, a change in science and industry best practices may spur rule changes.



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For Megan Stratman

FROM: Bret Stevens
Senior Economist
Rates, Safety and Utility Performance Program

OREGON PUBLIC UTILITY COMMISSION
Docket No. UE 416 - PGE Data Request filed June 23, 2023

PGE Data Request No 36:

36. Please provide the number of hours spent identifying probable vegetation management violations each month from 2010 to 2023. If the data is not available by month, please provide the next best degree of granularity of this information.

OPUC Response No 36:

OPUC Safety Staff doesn't record hours logged, however in each audit report it identifies the days during which audits were performed, and PGE can review each of the reports provided to infer such information.

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For Megan Stratman

FROM: Bret Stevens
Senior Economist
Rates, Safety and Utility Performance Program

OREGON PUBLIC UTILITY COMMISSION
Docket No. UE 416 - PGE Data Request filed June 23, 2023

PGE Data Request No 37:

37. Please provide the number of line-miles reviewed for probable vegetation management violations each month from 2010 to 2023. If the data is not available by month, please provide the next best degree of granularity of this information.

OPUC Response No 37:

As stated previously, OPUC Safety Staff target spot checks throughout the service territory.