

# Oregon Joint Use Association

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October 8, 2021

Via: Electronic Filing

Public Utility Commission of Oregon

Attention: Filing Center

P.O. Box 1088

Salem, Oregon 97301-1088

Re: AR 638 Risk-based Wildfire Protection Plans rulemaking comment period

Dear Filing Center:

This correspondence is in regard to the AR 638 Risk-based Wildfire Protection Plans rulemaking. The Oregon Joint Use Association (OJUA) respectfully requests that the deadline to submit comments on the draft rules be extended beyond October 18, 2021.

OAR 860-028-0200 requires establishing a Joint-Use Association to advise the Commission on adoption, amendment, or repeal of administrative rules governing pole owners and pole occupants. The OJUA is recognized as the organization representing both pole owners and users in compliance with 860-028-0200. The OJUA Board represents a diverse set of entities engaged in providing energy and telecommunications services throughout Oregon. The OJUA Board believes that the diversity of entities and their views requires more time for comment than afforded by the current schedule.

The work of preventing wildfires is important and the OJUA pledges not to burden the proceeding by extending the schedule unnecessarily. However, in previous proceedings the comments of the OJUA have been viewed by the Commission as useful and adding valuable insight to the conversation.<sup>1</sup> The OJUA Board believes that if allowed the additional time to provide comments that reflect its diverse membership's views that all parties will find OJUA's comments insightful.

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<sup>1</sup> See, Rulemaking to Amend and Adopt Permanent Rule in OAR 860, Divisions 024 and 028, Regarding Pole Attachment Use and Safety, ORDER NO. 06-547 at 8: "To educate the industry about these new rules and ease enforcement, the Commission encourages Staff and the OJUA to continue to work together in implementing these rules in a safe and cost-effective manner."

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Dedicated to the Education, Cooperation,  
and Resolution of Utility Joint Use Issues

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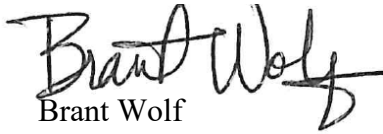
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Therefore, we ask that the comment period be extended through November 19, 2021, and that subsequent dates be adjusted accordingly. This extension will allow the OJUA sufficient time to reflect the views of all of our members in our comments.

Please do not hesitate to contact me at 503.871.0479 if you would like to discuss this request. Thank you for any consideration you can give to our request.

Sincerely,

A handwritten signature in black ink that reads "Brant Wolf". The signature is written in a cursive style with a large, stylized "B" and "W".

Brant Wolf  
OJUA President – 2021

cc (via e-mail): Lori Koho