

April 17, 2007

***VIA ELECTRONIC FILING
AND HAND DELIVERY***

Oregon Public Utility Commission
550 Capitol Street NE, Ste 215
Salem, OR 97301-2551

Attention: Vikie Bailey-Goggins, Administrator
Regulatory Operations

RE: **Docket No. UM-1308**
PacifiCorp *Revised* Proposal for Implementing Division 24 Pilot
Program Phase-One

On April 9, 2007, PacifiCorp (d.b.a. Pacific Power & Light) submitted its Proposal for Implementing Division 24 Pilot Program Phase-One. This filing was assigned Docket No. UM-1308. As explained in the cover letter of the April 9 filing, approval of this filing would allow the Company to engage in a pilot program that deviates from the Measure X2 (Basic Inspection and Maintenance Programs) in PacifiCorp's Alternative Form of Regulation (AFOR) Service Quality Measure (SQM) Stipulation. As a result of on-going discussions with Commission Staff, PacifiCorp now submits revised versions of Attachments A and B. Attachment A is the proposed modification to the SQM from Order No. 98-191. Attachment B contains the implementation details for the pilot. Included in this submission are redlined versions that show the changes to these documents from the April 9 filing.

Specifically, the changes agreed to by the Company and Staff include the following provisions: 1) either Staff or the Company may request the discontinuance of the pilot, 2) Staff and the Company agree to work out criteria for conditions to be corrected beyond four years of discovery, and 3) the Company will submit annual summary reports for regular line maintenance expenditures and a separate report for corrective maintenance.

In summary, the Company and Commission Staff have developed a Pilot Program Phase-One, which puts into practice some of the modifications to Division 24 Safety Rules. This pilot program will provide practical experience and lessons to be learned for the broader implementation of Division 24 Safety Rules. The Company respectfully requests, and understands that the Staff supports, that the Commission approve the amendments in Attachment A to its AFOR X2 Inspection and Maintenance Programs at the May 8, 2007 Public Meeting.

A signed original letter and five (5) copies will be provided via hand delivery.

It is respectfully requested that all formal correspondence and Staff requests regarding this matter be addressed to:

By E-mail (preferred): datarequest@pacificorp.com.

By Fax: (503) 813-6060

By regular mail: Data Request Response Center
PacifiCorp
825 NE Multnomah, Suite 2000
Portland, OR 97232

Informal inquiries may be directed to Joelle Steward, Regulatory Manager, at (503) 813-5542.

Sincerely,



Andrea L. Kelly
Vice President, Regulation

Enclosures (2)

cc: Service List UM-1308

I hereby certify that on this 17th day of April, 2007, I caused to be served, via hand delivery, a true and correct copy of PacifiCorp's Revised Proposal for Implementing Division 24 Pilot Program Phase-One, Docket No. UM-1308 to the following:

ANDREA L. KELLY VICE PRESIDENT – REGULATION 825 NE MULTNOMAH ST. SUITE 2000 PORTLAND, OR 97232 Andrea.kelly@pacificorp.com	
--	--



Peggy Ryan
Supervisor Regulatory Administration

ATTACHMENT A
REDLINED VERSION

PACIFIC POWER & LIGHT

April 9, 2007

Page 1 of 3

Proposed exceptions to UE 94:

Modification to Pacific's Service Quality Measure Stipulation:

Note – Additions to X2.I.A. and X2.I.C. provisions in the X2 Measure are shown underlined and in bold below. Other provisions in the Measure X2 are unchanged.

MEASURE X2 -- BASIC INSPECTION AND MAINTENANCE PROGRAMS

I. INSPECTION AND REPAIRS

A. Pole and Overhead Facilities

1. Description: Inspection and treatment of all Company-owned distribution and transmission poles and overhead distribution facilities. All Company-owned poles are intrusively inspected for strength. Distribution equipment attached to any pole is inspected, repaired, or replaced to ensure the electrical system remains in good working order and meets the National Electric Safety Code (NESC). The first cycle is completed in 1998. The second cycle begins January 1999.
2. Required Interval: 10-year cycle, 10% annually with no individual year falling below 8.5%. Repairs or replacement completed promptly. Repairs are designated "A" (immediate hazard), requiring correction within 30 days, or "B," requiring correction within approximately one year but in no case extending beyond the calendar year following the year of discovery.

EXCEPTION:

Company may engage in a pilot project to end on December 31, 2009, that would allow certain designated "B" NESC violations to be extended beyond the correction deadlines covered in section 2 above. With this pilot project, the Company may elect to defer correction of violations of the NESC that pose little or no foreseeable risk of danger to life or property to the next major activity associated with the violation location or within four years of discovery, whichever is sooner. The company shall file a plan of correction to PUC Staff for all of these violations that will not be corrected within four years of discovery.

Attachment A

Upon completion of the project, the Commission will consider adopting these provisions permanently. Either Staff or the Company can request discontinuance of the pilot.

3. Company Quality Control: Inspection by appropriate random sample to ensure accuracy of inspection. Minimum 5% of facility points that have been detail inspected are inspected as needed to ensure NESC compliance during each year.
4. Program Expenditures: Annual budget figures to include: (a) Pole and Overhead Facilities Inspection and Pole Treatment; and (b) Repair and Replacement of Facilities

~~B. Safety Survey~~

- ~~1. Description: A drive by survey of the distribution system. The survey is designed to spot incidental damage to the system (such as damage from stormy weather) that neither caused an outage nor was reported.~~
- ~~2. Required Interval: 2-year cycle with 50% of the system driven yearly.~~
- ~~3. Company Quality Control: Random sample by supervisory personnel or their designees to ensure uniform results and adherence to the plan and accuracy of survey.~~
- ~~4. Program Expenditures: Planned and actual annual budget.~~

C. Underground Facilities:

1. Description: Inspection program includes a thorough visual inspection of underground vaults, pad-mount transformers, switches, and an infrared inspection of all accessible terminals and splices. The first cycle starts in 1998.

PACIFIC POWER & LIGHT

Pacific, UM 1308

April 9~~13~~, 2007

Page 3

Proposed exceptions to UE 94:

of 3

Attachment A

2. Required Interval: 4-year cycle, 25% of the system annually with no individual year falling below 20% of the system.

Exception:

The Company may engage in a pilot project to end on December 31, 2009, that would allow the Company to conduct its underground facilities inspections on 10-year inspection cycle in conformance with OAR 860-024-0011(1)(c). Upon completion of the project, the Commission will consider adopting these provisions permanently. Either Staff or the Company can request discontinuance of the pilot.

3. Company Quality Control: Inspection by appropriate random sample to ensure accuracy of inspection.
4. Program Expenditures: Annual budget figures to include: (a) Facilities Inspection, and (b) Repair and Replacement of Facilities.

ATTACHMENT A

CLEAN VERSION

Attachment A

Modification to Pacific's Service Quality Measure Stipulation:

Note – Additions to X2.I.A. and X2.I.C. provisions in the X2 Measure are shown underlined and in bold below. Other provisions in the Measure X2 are unchanged.

MEASURE X2 -- BASIC INSPECTION AND MAINTENANCE PROGRAMS

I. INSPECTION AND REPAIRS

A. Pole and Overhead Facilities

1. Description: Inspection and treatment of all Company-owned distribution and transmission poles and overhead distribution facilities. All Company-owned poles are intrusively inspected for strength. Distribution equipment attached to any pole is ~~inspected, repaired, or replaced~~ to ensure the electrical system remains in good working order and meets the National Electric Safety Code (NESC). The first cycle is completed in 1998. The second cycle begins January 1999.
2. Required Interval: 10-year cycle, 10% annually with no individual year falling below 8.5%. Repairs or replacement completed promptly. Repairs are designated "A" (immediate hazard), requiring correction within 30 days, or "B," requiring correction within approximately one year but in no case extending beyond the calendar year following the year of discovery.

EXCEPTION:

Company may engage in a pilot project to end on December 31, 2009, that would allow certain designated "B" NESC violations to be extended beyond the correction deadlines covered in section 2 above. With this pilot project, the Company may elect to defer correction of violations of the NESC that pose little or no foreseeable risk of danger to life or property to the next major activity associated with the violation location or within four years of discovery, whichever is sooner. Either Staff or the Company can request discontinuance of the pilot.

Attachment A

3. Company Quality Control: Inspection by appropriate random sample to ensure accuracy of inspection. Minimum 5% of facility points that have been detail inspected are inspected as needed to ensure NESC compliance during each year.
4. Program Expenditures: Annual budget figures to include: (a) Pole and Overhead Facilities Inspection and Pole Treatment; and (b) Repair and Replacement of Facilities

C. Underground Facilities:

1. Description: Inspection program includes a thorough visual inspection of underground vaults, pad-mount transformers, switches, and an infrared inspection of all accessible terminals and splices. The first cycle starts in 1998.
2. Required Interval: 4-year cycle, 25% of the system annually with no individual year falling below 20% of the system.

Exception:

The Company may engage in a pilot project to end on December 31, 2009, that would allow the Company to conduct its underground facilities inspections on 10-year inspection cycle in conformance with OAR 860-024-0011(1)(c). Either Staff or the Company can request discontinuance of the pilot.

3. Company Quality Control: Inspection by appropriate random sample to ensure accuracy of inspection.
4. Program Expenditures: Annual budget figures to include: (a) Facilities Inspection, and (b) Repair and Replacement of Facilities.

ATTACHMENT B

REDLINED VERSION

**Pacific Power
Proposal for Implementing Division 24 Pilot Program
Phase-one**

April 912, 2007
(Version 67)



**Pacific Power
Proposal for Implementing Division 24 Pilot Program
Phase-one**

**April 9¹², 2007
(Version 6⁷)**

CONTENTS

1.0	EXECUTIVE SUMMARY	3
2.0	INSPECTIONS	5
3.0	CLASSIFICATION OF CONDITIONS AND PRIORITIZATION OF REPAIRS	6
4.0	PIAN OF CORRECTION	8
5.0	10-YEAR UNDERGROUND INSPECTION CYCLE.....	1140
6.0	SUGGESTED REPORTS TO MANAGE AND EVALUATE STATUS OF INSPECTION AND CORRECTION PROGRAMS:	1244
7.0	RECOMMENDATION.....	1544
	Appendix A: PROPOSED THREE-TIER PRIORITIZATION MODEL, INCLUDING CRITERIA BY CONDITION CODE (3 PAGES).....	1645

1.0 EXECUTIVE SUMMARY

During 2005 and 2006, the Oregon Public Utilities Commission spear-headed rulemaking revisions in Division 24, pertinent to pole safety, vegetation management, inspection and prioritization of repairs. The final order adopting the rules was issued on September 26, 2006. Several changes were incorporated, notably:

- 1) Modification of vegetation management practices, adopting minimum clearance requirements
- 2) Advance notification of inspection plans to facilitate coordination of inspections
- 3) Adoption of ~~40~~ten-year underground electric system inspection cycles
- 4) Changes within prioritization of outstanding conditions found in the course of inspections, requiring correction.

As a result of this rulemaking, Pacific Power requested that OPUC safety staff consider how the company could implement some of the provisions adopted in Division 24. Specifically, Pacific Power seekedsought permission to adopt a ~~40~~ten-year underground inspection cycle and migrate to the three-tier correction prioritization model as outlined in Division 24, 860-024-0012(3).

Staff identified several criteria a proposed plan needed to include which are listed below:

- 1) Logic that would support deferring correction of conditions that pose little or no foreseeable risk of danger to life or property
- 2) Process analysis to ensure the optimum plan of correction methods are employed
- 3) Details about how communications between pole owners and pole users regarding identification of conditions and plans for corrections
- 4) Management tools to track outstanding conditions and progress towards correction
- 5) Attribute and data details to enable interchange of information amongst stakeholders.

Pacific Power had drafted a proposed plan and met with OPUC safety staff on February 8, 2007, however completion of the comprehensive plan has been impacted by formation of the Oregon Joint Use Association Prioritization Repairs Committee which has taken on the task of recommending an industry approach to standardizing prioritization of repairs. The findings are due April 17, 2007. Another impact has been determining the communication protocols for conditions that effect both pole owners and pole users for notification and plan of correction. The process for ensuring pole owners and pole users agree on standard processes, including development of "plan of correction" protocols requires greater cooperative efforts and is taking more time; therefore it will be submitted as a phase-two pilot plan.

This document outlines a proposal for implementing a phase-one pilot program that allows Pacific Power to put into action certain aspects of Division 24 rules; specifically the ~~40~~ten-year underground inspection cycle and three tiers of prioritization of conditions found during the course of inspection limited to conditions that do not impact other joint pole users. It will propose specific conditions that pose imminent danger, conditions that must be repaired within two years of discovery and conditions that pose little or no foreseeable risk of danger to life or property that can be corrected during the next major work activity or within four years of discovery whichever comes first. Further, it will specify management reports that can be used in the administration and assessment of inspection and correction progress which Pacific Power undertakes. Before the termination of the pilot, Pacific Power and OPUC safety staff will mutually agree on criteria that allow certain conditions which pose little or no foreseeable risk of danger to life or property to be corrected beyond four years after discovery.



Further, the pilot program will specify management reports that can be used in the administration and assessment of inspection and correction progress which Pacific Power undertakes.

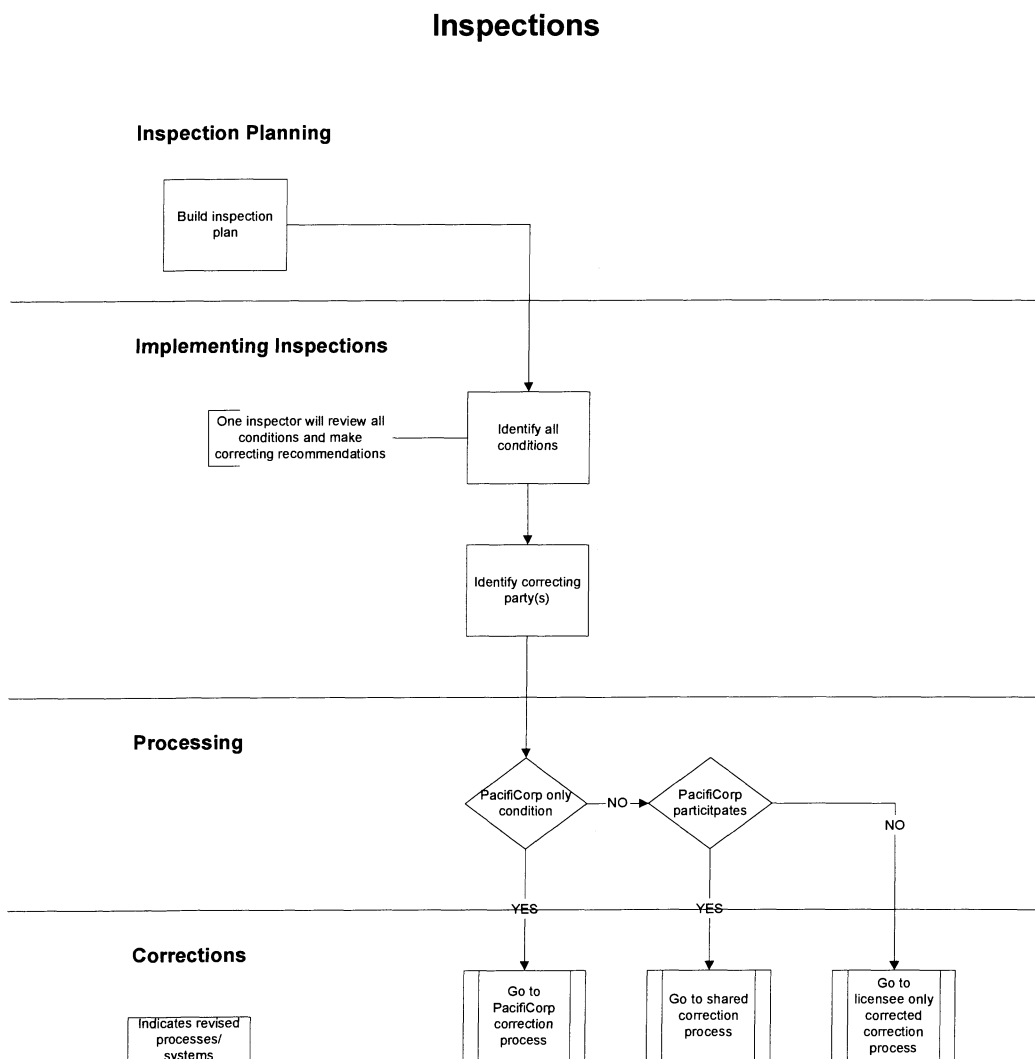
The proposed effective date would be ~~April 24~~May 8, 2007, for conditions discovered retroactive to January 1, 2007 and would stay in effect until December 31, 2009 or ~~permanent~~until changes are made to the UE 94 service quality measures. ~~Safety Staff~~Either OPUC safety staff or Pacific Power can request discontinuance of the pilot program.

2.0 INSPECTIONS

Inspection activities begin the process which includes early identification of areas that will be inspected and sharing inspection plans with the joint pole users, thus providing the basis for future coordination of inspection and correction activities. Pacific Power will designate the annual inspection areas in advance of the start of the year.

Additionally, in order to leverage inspections performed at company poles, additional detail will be captured to support correction plans being developed early in the process. The inspector will identify the most likely party to correct each condition, fundamentally identifying whether that correction is the company's responsibility or that of a joint pole user.

The diagram below outlines the current inspection process and includes the additional step identifying the correcting party in "yellow" (shaded).



3.0 CLASSIFICATION OF CONDITIONS AND PRIORITIZATION OF REPAIRS

Pacific Power has reviewed the company 'condition types' with respect to the NESC code and other situations that record network conditions but are not referenced in NESC code. Non-NESC conditions will be excluded from any reporting to OPUC safety staff and will not be included in status or progress reports.

The remaining condition types represent network NESC conditions and will fall into three categories:

- Conditions that pose imminent danger and must be repaired promptly
- Conditions that must be repaired within two-years of discovery
- Conditions that pose little or no foreseeable risk of danger to life or property that can be corrected during the next major work activity or within the second two-year cycle after year four years of discovery whichever comes first. ~~Any conditions that are not corrected within the second two-year cycle after year of discovery will require a plan of correction to be filed with public utility commission staff~~

Annually the company will present a status report to OPUC safety staff that shows company/district conditions that have been recorded, cleared, outstanding balances and average age of conditions. ~~At the same time, any conditions that have not been corrected within the second two-year cycle after year of discovery must have a plan of correction presented to OPUC safety staff.~~

Appendix A shows the NESC conditions types and how they are classified as imminent danger, repair within two years and conditions that would be candidates for deferral if they were not corrected within two years. The variety of condition codes only serve as options for inspectors to use when performing actual inspections.

NESC conditions are recorded in the company data base called Facility Point Inspection Database (FPI) and include several attributes such as:

- condition type (primary/secondary)
- date recorded
- date corrected
- type of inspection (safety or detailed)
- who performed the inspection
- district / map reference
- specific remarks about the condition

The pilot program would continue to have the inspectors capture NESC conditions in the same manner using current standards and training. The back-end prioritization of repairs by management will determine when they will be repaired and will conform to the criteria described



above. Only lower priority NESC conditions will be candidates for deferral beyond the two-year period.

The company will also examine the existing outstanding (legacy) conditions at December 31, 2006 and determine the optimum timeframe for correction however will not be limited to having them repaired by December 31, 2007.

4.0 PLAN OF CORRECTION

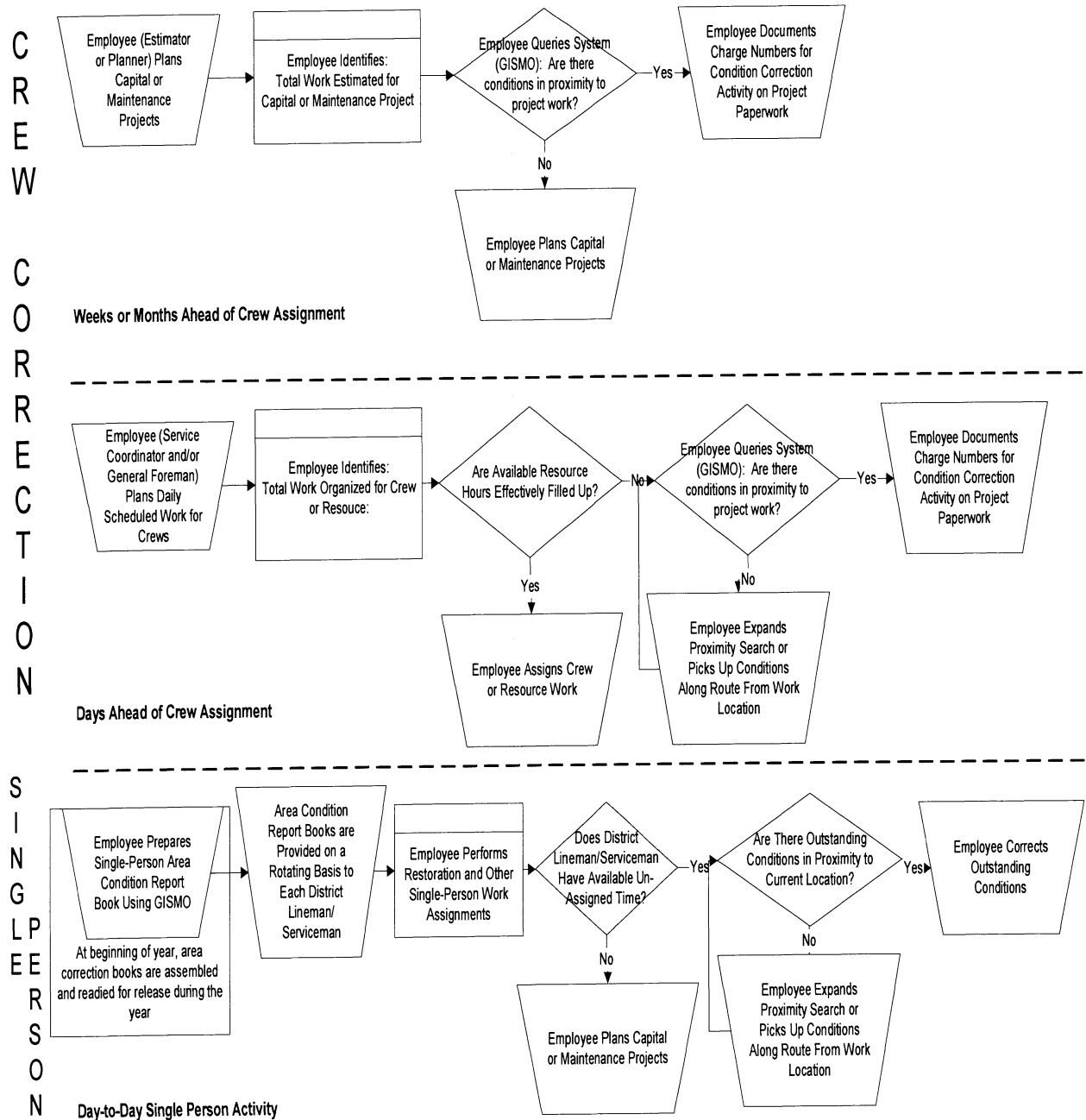
Significant improvements in organizing utility work and optimizing crew scheduling have been implemented at Pacific Power with the advent of geographically-based tools that help bundle work efficiently. This bundling is handled using the company's Geographic Information System Maintenance Organizer (GISMO) tool which gives work planners, in spatial or tabular form, a method to optimize plan of corrections. Within established parameters, a planner can group work requests (construction/maintenance/outstanding NESC conditions) that require certain sized crew resources and include outstanding NESC conditions within proximity to each other. Therefore, conditions that have been postponed for repair will not be automatically delayed until the very end of the timeline for correction but rather will be grouped with other work that takes place in the general vicinity. Pacific Power believes the proposed prioritization of repair rules will bring about economic benefits without compromising safety to the public or workers.

Prioritization of repairs shall recognize conditions that are determined imminent danger and must be repaired promptly while other conditions shall be repaired within two-years ~~after year from date~~ of discovery unless they are low risk to life or property which can be repaired during the next work activity or ~~before the due date for repair within four years of discovery~~ whichever comes first. ~~Conditions that are low risk to life or property will be targeted for repair within the second two-year cycle or next major work activity whichever comes first. Conditions that are outstanding beyond the second two-year cycle after year of discovery would require a plan of correction submitted to OPUC safety staff during the annual review of company performance.~~ Pacific Power management and OPUC safety staff will jointly monitor the balance of outstanding conditions. Outstanding balances will be assessed at the end of each year to determine if the plan of correction is reasonable.

~~Pacific Power is confident that plans for correction will avoid a back-log of conditions that could prove overwhelming for the company to remedy in a compressed timeframe.~~

The chart below depicts the company process on managing corrections.

Process Diagram for Leveraging Corrections within Regular Work Routine



5.0 10-YEAR UNDERGROUND INSPECTION CYCLE

Pacific Power is recommending moving to a 10-year inspection cycle for underground facilities as described in the Division 24 rules except for Portland downtown underground which will remain on a quarterly cycle. Oregon underground facilities have been through 2 complete 4-year cycles involving visual inspection of underground vaults, pad-mount transformers, switches and terminals.

Recent annual inspection results are not finding many NESC conditions as seen in the chart below:

Oregon Underground Inspections and Conditions Found by Calendar Year

	Calendar Year				
	2002	2003	2004	2005	2006
Inspections	12,136	11,113	15,039	20,997	20,911
Conditions Found	1,113	1,053	1,006	1,330	892
Conditions Found / Inspections	9.2%	9.5%	6.7%	6.3%	4.3%

Pacific Power re-activated all secondary underground facility points in 2004 which increased the number of facility points requiring inspections. The chart indicates that even with increased facility point and inspection counts, the number of underground conditions being found each year is decreasing. This can be primarily attributed to Pacific Power having performed complete cycle inspections on the underground system twice. Pacific Power is finding less than 50% of the number of conditions found in 2002 as a percentage of the inspections performed.

Pacific Power feels comfortable moving to 10-year inspection cycle based on the data above. Also, Pacific Power visits underground facility points each time there is a fault on underground cable. Only the inspections performed during the formal program are recorded in the Facility Point Inspection database. Since fewer conditions are being found and facilities are visited any time an outage occurs, it would be prudent to move to a 10 year underground inspection cycle.

6.0 SUGGESTED REPORTS TO MANAGE AND EVALUATE STATUS OF INSPECTION AND CORRECTION PROGRAMS:

The company recognizes condition reports need to include many dimensions of data in order to manage, monitor and evaluate the three-tier prioritization model. Preliminary specifications of reports that will provide such functionality are identified below.

- Summary report of outstanding NESC conditions by priority and by responsible party
- Conditions found during last period by priority and by responsible party
- Average age of conditions by priority, condition type and responsible party
- ~~Summary report of incomplete plans of correction (where conditions & priority known, with no associated planned completion date)~~
- ~~Summary report of unaccepted plans of correction (where conditions, priority, planned completion date and affected parties known)~~
- Planned completion dates by company by condition priorities by geographic location
- Comparison of next activity company to responsible party sorted by descending age
- Annual summary reports showing actual/budget maintenance expenditures for transmission & distribution regular line maintenance and a separate report for corrective maintenance. (The majority of outstanding conditions will be repaired under corrective maintenance, but outstanding conditions are also repaired under regular line maintenance and storm repair work orders)

ognos PowerPlay Web Explorer fpi_conditions_summary COGNOS

Cube Refreshed on 2:44:41 AM Friday, February 02, 2007

⌂ ⏪ Dtm ▼ Current Month ▼ Condition Region Rollup ▼ Condition State Rollup ▼ Geographic Location Rollup ▼ Priority ▼ Condition Type ▼ MEASURES ▼
⏩ ⌂ ⏪

2007/Jan

MEASURES as values				Beginning	New Conditions	Cleared	Ending	Average of Age	
Pacific	South PP	Albany	DIST	A	0	1	0	1	0
			B	3,694	1	22	3,673	389	
			C	3	1	0	4	187	
				Summary	3,698	2	22	3,677	386
			MAIN	A	0	0	0	0	0
			B	0	0	0	0	0	
			C	0	0	0	0	0	
				Summary	0	0	0	0	
			TRAN	A	0	1	1	0	0
			B	227	0	0	227	598	
			C	0	0	0	0	0	
				Summary	227	1	1	227	598
				Dtm	3,924	4	23	3,905	401
			Alturas	DIST	A	0	0	0	0
				B	2,338	2	59	2,281	361
				C	60	1	0	61	59
				Summary	2,398	3	59	2,368	361
			MAIN	A	0	0	0	0	0
			B	0	0	0	0	0	
			C	0	0	0	0	0	
				Summary	0	0	0	0	
			TRAN	A	0	0	0	0	0
			B	0	0	0	0	0	
			C	0	0	0	0	0	
				Summary	0	0	0	0	

Example 1: Monthly Condition Summary Report outlining status of all conditions

1	Cube Refreshed on 2:44:41 AM Friday, February 02, 2007							
2	[Dtm][Time][Condition Region Rollup][OR][Geographic Location Rollup][Priority][CLRTV]MEASURES							
3								
4				DIST				
		MEASURES						
		as values		Beginning	New Conditions	Cleared	Ending	Average of Age
5								
6	Albany	A Company 1	100	190	49	241	15	
7		A Company 2	10	59	29	40	16	
8		A Company 3	189	10	52	147	31	
9		B Company 1	190	57	29	218	101	
10		B Company 2	100	15	59	56	79	
11		B Company 3	459	58	152	365	252	
12		C Company 1	125	12	0	137	157	
13		C Company 2	111	15	12	114	367	
14		C Company 3	57	57	0	114	31	
15		Priority	0	190	49	141	425	
16	Astoria	A CLRTV	0	0	0	0	0	
17		B CLRTV	0	490	102	388	524	
18		C CLRTV	0	0	0	0	0	

Example: Monthly Status Report by company of correction progress.

MEASURES as values	2006/Dec					2007/Jan				
	Beginning	New Conditions	Cleared	Ending	Average of Age	Beginning	New Conditions	Cleared	Ending	Average of Age
North PP										
Astoria	661	24	39	646	275	646	422	72	996	202
Bend	3,374	2	121	3,255	182	3,255	5	525	2,735	178
Freewater	251	0	24	227	361	227	1	3	225	394
Hermiston	16	582	247	351	35	351	8	28	331	66
Hood River	230	0	23	207	152	207	0	0	207	183
Madras	8	0	1	7	44	7	22	3	26	56
Pendleton	572	593	297	868	105	868	7	80	795	143
Portland	2,039	14	14	2,039	255	2,039	2,642	372	4,309	142
Prineville	1	6	0	7	37	7	15	20	2	67
Redmond	123	6	0	129	109	129	1	4	126	139
South PP										
Albany	2,152	0	73	2,079	261	2,079	3	19	2,063	290
Alturas	553	413	39	927	181	927	4	1	930	212
Coos Bay	1,507	39	134	1,412	205	1,412	13	67	1,358	226
Corvallis	161	0	2	159	312	159	1	0	160	343
Cottage Grove	2,069	0	0	2,069	152	2,069	1	13	2,057	183
Crescent City	2,205	298	132	2,371	254	2,371	36	82	2,325	284
Dallas	286	0	2	284	230	284	3	1	286	259
Grants Pass	1,649	60	12	1,697	319	1,697	433	158	1,972	290
Junction City	17	0	0	17	157	17	1	0	18	177
Klamath Falls	3,173	179	51	3,301	381	3,301	5	7	3,299	411
Lakeview	487	370	72	785	179	785	0	0	785	210
Lebanon	1,180	2	6	1,176	249	1,176	4	0	1,180	279
Lincoln City	1,706	8	106	1,608	156	1,608	0	72	1,536	186
Medford	791	188	56	923	117	923	350	94	1,179	111
Roseburg	4,648	9	6	4,651	332	4,651	268	54	4,865	348
Stayton	95	1	1	95	370	95	0	0	95	401
Tulelake	1,693	1,292	140	2,845	196	2,845	60	58	2,847	226
Yreka	9,716	1,351	286	10,781	320	10,781	17	30	10,768	350
Pacific	75,122	7,311	3,133	79,300	546	79,300	4,832	2,453	81,679	550

Example: Monthly Status Report by company of correction progress.

7.0 RECOMMENDATION

The company believes the pilot program substantially improves the quality and efficiency of the inspection and correction programs. It aligns the company plan with the pertinent safety rules, and enables the company to effectively leverage its processes and tools to deliver results in the most optimal fashion. OPUC safety staff will monitor the company's performance against the provisions of the pilot program. It will provide a body of information for OPUC safety staff and Pacific Power alike on the ramifications of implementing division 24 changes.

Therefore, it is recommended that the company implement a 10-year inspection cycle for underground facilities (except for Portland downtown underground) and three-tier NESC conditions that do not impact other pole users as soon as possible. OPUC safety staff will be well-positioned to take advantage of the results and integrate them into longer-term solutions.

APPENDIX A: PROPOSED THREE-TIER PRIORITIZATION MODEL, INCLUDING CRITERIA BY CONDITION CODE (3 PAGES)

Row #	Condition Code	Condition	Imminent Danger	Repair within 2 Years	Candidate for Deferral
1	BIRDDMG	LARGE WOODPECKER HOLES #		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
2	BIRDDMG	SMALL WOODPECKER HOLES #			<input checked="" type="checkbox"/>
3	BIRDDMG	BIRD NESTS (LARGE IN PRIMARY)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	
4	BOCAP	CAPACITOR BANK LEAKING	<input checked="" type="checkbox"/>		
5	BOCOARR	JUMPERED OUT - NO GATE			<input checked="" type="checkbox"/>
6	BOCOARR	BURNT CONNECTION	<input checked="" type="checkbox"/>		
7	BOCOARR	BROKEN CUT OUT			<input checked="" type="checkbox"/>
8	BOCOND	FRAYED WIRE	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	
9	BOCOND	FLOATER		<input checked="" type="checkbox"/>	
10	BOCOND	LAYING ON ARM	<input checked="" type="checkbox"/>		
11	BOCOND	BARE SERVICE WIRE	<input checked="" type="checkbox"/>		
12	BOCOND	BROKEN LOOSE TIE WIRE		<input checked="" type="checkbox"/>	
13	BOCOND	COILED SERVICE WIRE HANGING FROM POLE		<input checked="" type="checkbox"/>	
14	BOCORRNG	LOOSE		<input checked="" type="checkbox"/>	
15	BOGRDBND	BROKEN GROUND	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	
16	BOGRDBND	HIGH GROUND ROD		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
17	BOGRDBND	MISSING		<input checked="" type="checkbox"/>	
18	BOGRDBND	HARDWARE NOT BONDED			<input checked="" type="checkbox"/>
19	BOGRDBND	LOOSE GROUND WIRE - ABOVE/BELOW ARM		<input checked="" type="checkbox"/>	
20	BOGRDBND	BURNED OPEN AT DISTRIBUTION ARM		<input checked="" type="checkbox"/>	
21	BOGRDBND	BURNED OPEN AT POLE TOP		<input checked="" type="checkbox"/>	
22	BOGRDBND	BOND BROKEN AT STATIC WIRE/FOG			<input checked="" type="checkbox"/>
23	BOGRDBND	BROKEN MISSING MOLDING			<input checked="" type="checkbox"/>
24	BOGUYANC	SLACK / BROKEN GUY		<input checked="" type="checkbox"/>	
25	BOGUYANC	MISSING/BROKEN GUY GUARD			<input checked="" type="checkbox"/>
26	BOGUYANC	BURIED ANCHOR EYE		<input checked="" type="checkbox"/>	
27	BOGUYANC	NEED SIDEWALK GUY ATTACHMENT			<input checked="" type="checkbox"/>
28	BOGUYANC	GUY TAILS NEED TO BE TRIMMED			<input checked="" type="checkbox"/>
29	BOGUYANC	ANCHOR PULLED		<input checked="" type="checkbox"/>	
30	BOGUYANC	NEED TO INSTALL DOWN GUY		<input checked="" type="checkbox"/>	
31	BOINSUL	BROKEN INSULATOR	<input checked="" type="checkbox"/>		
32	BOINSUL	LOOSE OR MISSING HARDWARE ON PIN		<input checked="" type="checkbox"/>	
33	BOINSUL	BAD INSULATOR DEAD END			<input checked="" type="checkbox"/>
34	BOLIGHT	LOOSE CONDUIT			<input checked="" type="checkbox"/>
35	BOLIGHT	LOOSE HARDWARE		<input checked="" type="checkbox"/>	
36	BOLIGHT	NEEDS NEW MAST			<input checked="" type="checkbox"/>
37	BOLIGHT	LIGHT HANGING BY WIRES	<input checked="" type="checkbox"/>		
38	BOLIGHT	STREET LIGHT NOT BONDED			<input checked="" type="checkbox"/>
39	BOLIGHT	NEEDS CONDUIT			<input checked="" type="checkbox"/>
40	BOPOLE	DAMAGE REJECT REPLACE	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	
41	BOPOLE	ROTTED POLE TOP, CAN'T FRAME DOWN		<input checked="" type="checkbox"/>	
42	BOPTSW	BURNT CONNECTION		<input checked="" type="checkbox"/>	
43	BORECL	LEAKING OIL	<input checked="" type="checkbox"/>		
44	BORECL	BURNT CONNECTION		<input checked="" type="checkbox"/>	

Note: Any condition could be classified as 'imminent danger' at the time of inspection based on severity of condition.

APPENDIX A: PROPOSED THREE-TIER PRIORITIZATION MODEL, INCLUDING CRITERIA BY CONDITION CODE

Row #	Condition Code	Condition	Imminent Danger	Repair within 2 Years	Candidate for Deferral
45	BOREG	BY PASS SWITCH BROKEN/BURNING		<input checked="" type="checkbox"/>	
46	BORISER	BROKEN CONDUIT	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	
47	BORISER	JOINT SEPARATED	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	
48	BORISER	CLIMBABLE RISER		<input checked="" type="checkbox"/>	
49	BORISER	LOOSE HARDWARE		<input checked="" type="checkbox"/>	
50	BORISER	TRIPPING HAZARD-STANDOFF BRACKET		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
51	BORISER	MISSING GROUNDING STRAP			<input checked="" type="checkbox"/>
52	BORISER	MISSING CONDUIT STRAPS		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
53	BORISER	GAP AT GROUND	<input checked="" type="checkbox"/>		
54	BOSECENC	BROKEN BOX / PEDESTAL REPLACE - EXPOSED WIRE	<input checked="" type="checkbox"/>		
55	BOSECENC	MISSING BROKEN LATCH / LOCK	<input checked="" type="checkbox"/>		
56	BOSVCENT	HOUSE KNOB PULLED OUT		<input checked="" type="checkbox"/>	
57	BOSVCENT	BARE CONNECTORS @ WEATHER HEAD	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	
58	BOSVCENT	BROKEN SERVICE GRIP		<input checked="" type="checkbox"/>	
59	BOSVCENT	BROKEN SERVICE ATTACHMENT		<input checked="" type="checkbox"/>	
60	BOSVCENT	CONDUIT SEPARATED AT METER BASE		<input checked="" type="checkbox"/>	
61	BOSVCENT	BAD ORDER METER BASE/ PULLED AWAY		<input checked="" type="checkbox"/>	
62	BOUG	BO CONDUCTOR		<input checked="" type="checkbox"/>	
63	BOUG	BAD PRIMARY UG ELBOW		<input checked="" type="checkbox"/>	
64	BOUG	BAD ORDER SPLICE		<input checked="" type="checkbox"/>	
65	BOXARM	ARM IS SPLIT/CRACKED/ROTTEN	<input checked="" type="checkbox"/>		
66	BOXARM	MISSING/LOOSE HARDWARE		<input checked="" type="checkbox"/>	
67	BOXARM	SQUATTER PIN		<input checked="" type="checkbox"/>	
68	BOXARM	ROTTEN, HARDWARE PULLING THROUGH	<input checked="" type="checkbox"/>		
69	BOXARM	ARM BRACE BROKEN/MISSING/LOOSE	<input checked="" type="checkbox"/>		
70	BOXARM	BADLY TWISTED ARM		<input checked="" type="checkbox"/>	
71	BOXARM	BURNED		<input checked="" type="checkbox"/>	
72	BOXARM	SPLIT/CRACKED, CAN BAND		<input checked="" type="checkbox"/>	
73	BOXARM	SPLIT/CRACKED, REPLACE		<input checked="" type="checkbox"/>	
74	BOXBRACE	LOOSE BRACES		<input checked="" type="checkbox"/>	
75	BOXBRACE	BROKEN BRACES	<input checked="" type="checkbox"/>		
76	BOXBRACE	LOOSE X BRACE ATTACHMENT HRDW		<input checked="" type="checkbox"/>	
77	BOXBRACE	MISSING X BRACE CENTER CLAMP		<input checked="" type="checkbox"/>	
78	BOXBRACE	LOOSE HARDWARE		<input checked="" type="checkbox"/>	
79	BOXBRACE	END SPLIT		<input checked="" type="checkbox"/>	
80	BOXFRMR	LEAKING	<input checked="" type="checkbox"/>		
81	BOXFRMR	BROKEN BUSHING		<input checked="" type="checkbox"/>	
82	BOXFRMR	REPOSITION ON PAD	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	
83	BOXFRMR	BROKEN LATCH	<input checked="" type="checkbox"/>		
84	BOXFRMR	BURNING CONNECTIONS		<input checked="" type="checkbox"/>	
85	CLEAR	DRIP LOOP LESS THAN 18"/12"		<input checked="" type="checkbox"/>	
86	CLEAR	LOW SVC OVER DRIVEWAY/ROADWAY/YARD		<input checked="" type="checkbox"/>	
87	CLEAR	LESS THAN 8' CLEARANCE CLIMBABLE		<input checked="" type="checkbox"/>	
88	CLEAR	SVC TO WINDOW /SIGN		<input checked="" type="checkbox"/>	

Note: Any condition could be classified as 'imminent danger' at the time of inspection based on severity of condition.

APPENDIX A: PROPOSED THREE-TIER PRIORITIZATION MODEL, INCLUDING CRITERIA BY CONDITION CODE (3 PAGES)

Row #	Condition Code	Condition	Imminent Danger	Repair within 2 Years	Candidate for Deferral
89	CLEAR	CLEARANCE TO UNATTACHED TO POLE			<input checked="" type="checkbox"/>
90	CLEAR	LOW PRIMARY/ SECONDARY	<input checked="" type="checkbox"/>		
91	CLEAR	CONDUCTOR TO BUILDING/ SIGN	<input checked="" type="checkbox"/>		
92	CLEAR	GUY WIRE AGAINST NEUTRAL/ SVC		<input checked="" type="checkbox"/>	
93	CLEAR	TOP OF RISER TOO CLOSE TO CATV/TELCO			<input checked="" type="checkbox"/>
94	CLEAR	SERVICE RUBBING ON HOUSE/ GUTTER		<input checked="" type="checkbox"/>	
95	COOTHER	POLE TOP FEATHERED NEEDS EVAL			<input checked="" type="checkbox"/>
96	COOTHER	POLE TOP SPLIT USE SPLIT BOLT			<input checked="" type="checkbox"/>
97	COOTHER	AERIAL/ CROSSING MARKER MISSING			<input checked="" type="checkbox"/>
98	LOWWHEAD	18" CLEARANCE VIOLATION POST '77 NESC			<input checked="" type="checkbox"/>
99	LOWWHEAD	12" CLEARANCE VIOLATION PRE '77 NESC			<input checked="" type="checkbox"/>
100	LOWWHEAD	9'6" GROUND CLEARANCE POST '77 NESC			<input checked="" type="checkbox"/>
101	LOWWHEAD	8' GROUND CLEARANCE PRE '77 NESC		<input checked="" type="checkbox"/>	
102	OWNERPRB	ANTENNA ATTACHED TO MAST			<input checked="" type="checkbox"/>
103	OWNERPRB	MAST BROKEN		<input checked="" type="checkbox"/>	
104	OWNERPRB	MAST NOT GUYED			<input checked="" type="checkbox"/>
105	RWENRCH	SIGN ON POLE			<input checked="" type="checkbox"/>
106	RWENRCH	CUSTOMER-OWNED ATTACHED			<input checked="" type="checkbox"/>
107	RWENRCH	BASKETBALL HOOP ATTACHED TO POLE			<input checked="" type="checkbox"/>
108	RWENRCH	CUST OWNED LGT OR WIRE ATTACHED TO POLE			<input checked="" type="checkbox"/>
109	RWENRCH	ANTENNA ATTACHED TO POLE			<input checked="" type="checkbox"/>
110	TREECLMB	CLIMBABLE TREE	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	
111	TREECLMB	BY SCHOOL	<input checked="" type="checkbox"/>		
112	TREECLMB	BY DAY CARE	<input checked="" type="checkbox"/>		
113	TREECLMB	BY CHURCH	<input checked="" type="checkbox"/>		
114	TREECLMB	TREE HOUSE	<input checked="" type="checkbox"/>		
115	TREETRIM	LIMB/TREE DEFLECTING OR HARD AGAINST SVC			<input checked="" type="checkbox"/>
116	TREETRIM	VINE ON POLE			<input checked="" type="checkbox"/>
117	TREETRIM	TREES BURNING IN PRIMARY	<input checked="" type="checkbox"/>		
118	TREETRIM	TREES BURNING IN OPEN SECONDARY		<input checked="" type="checkbox"/>	
119	UBPROB	BAD CROSS ARM	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	
120	UBPROB	BROKEN INSULATOR		<input checked="" type="checkbox"/>	
121	UBPROB	BAD DEAD-END		<input checked="" type="checkbox"/>	
122	UBPROB	BROKEN TIE WIRE		<input checked="" type="checkbox"/>	
123	UBPROB	MISSING HARDWARE		<input checked="" type="checkbox"/>	
124	UBPROB	BROKEN/CUT GROUND BOND		<input checked="" type="checkbox"/>	
125	UBPROB	BAD CONDUCTOR		<input checked="" type="checkbox"/>	
126	UBPROB	BAD GUY/ANCHOR		<input checked="" type="checkbox"/>	
127	WASHOUT	BACKFILL POLE		<input checked="" type="checkbox"/>	
128	WASHOUT	ROCKS/RIFFRAFF POLE		<input checked="" type="checkbox"/>	

Note: Any condition could be classified as 'imminent danger' at the time of inspection based on severity of condition.

ATTACHMENT B

CLEAN VERSION

**Pacific Power
Proposal for Implementing Division 24 Pilot Program
Phase-one**

April 12, 2007
(Version 7)



**Pacific Power
Proposal for Implementing Division 24 Pilot Program
Phase-one**

**April 12, 2007
(Version 7)**

CONTENTS

1.0 EXECUTIVE SUMMARY 3
2.0 INSPECTIONS 5
3.0 CLASSIFICATION OF CONDITIONS AND PRIORITIZATION OF REPAIRS 6
4.0 PLAN OF CORRECTION 8
5.0 10-YEAR UNDERGROUND INSPECTION CYCLE 10
6.0 SUGGESTED REPORTS TO MANAGE AND EVALUATE STATUS OF INSPECTION AND
CORRECTION PROGRAMS: 11
7.0 RECOMMENDATION 14
Appendix A: PROPOSED THREE-TIER PRIORITIZATION MODEL, INCLUDING CRITERIA BY
CONDITION CODE (3 PAGES) 15

1.0 EXECUTIVE SUMMARY

During 2005 and 2006, the Oregon Public Utilities Commission spear-headed rulemaking revisions in Division 24, pertinent to pole safety, vegetation management, inspection and prioritization of repairs. The final order adopting the rules was issued on September 26, 2006. Several changes were incorporated, notably:

- 1) Modification of vegetation management practices, adopting minimum clearance requirements
- 2) Advance notification of inspection plans to facilitate coordination of inspections
- 3) Adoption of ten-year underground electric system inspection cycles
- 4) Changes within prioritization of outstanding conditions found in the course of inspections, requiring correction.

As a result of this rulemaking, Pacific Power requested that OPUC safety staff consider how the company could implement some of the provisions adopted in Division 24. Specifically, Pacific Power sought permission to adopt a ten-year underground inspection cycle and migrate to the three-tier correction prioritization model as outlined in Division 24, 860-024-0012(3).

Staff identified several criteria a proposed plan needed to include which are listed below:

- 1) Logic that would support deferring correction of conditions that pose little or no foreseeable risk of danger to life or property
- 2) Process analysis to ensure the optimum plan of correction methods are employed
- 3) Details about how communications between pole owners and pole users regarding identification of conditions and plans for corrections
- 4) Management tools to track outstanding conditions and progress towards correction
- 5) Attribute and data details to enable interchange of information amongst stakeholders.

Pacific Power had drafted a proposed plan and met with OPUC safety staff on February 8, 2007, however completion of the comprehensive plan has been impacted by formation of the Oregon Joint Use Association Prioritization Repairs Committee which has taken on the task of recommending an industry approach to standardizing prioritization of repairs. The findings are due April 17, 2007. Another impact has been determining the communication protocols for conditions that effect both pole owners and pole users for notification and plan of correction. The process for ensuring pole owners and pole users agree on standard processes, including development of "plan of correction" protocols requires greater cooperative efforts and is taking more time; therefore it will be submitted as a phase-two pilot plan.

This document outlines a proposal for implementing a phase-one pilot program that allows Pacific Power to put into action certain aspects of Division 24 rules; specifically the ten-year underground inspection cycle and three tiers of prioritization of conditions found during the course of inspection limited to conditions that do not impact other joint pole users. It will propose specific conditions that pose imminent danger, conditions that must be repaired within two years of discovery and conditions that pose little or no foreseeable risk of danger to life or property that can be corrected during the next major work activity or within four years of discovery whichever comes first. Before the termination of the pilot, Pacific Power and OPUC safety staff will mutually agree on criteria that allow certain conditions which pose little or no foreseeable risk of danger to life or property to be corrected beyond four years after discovery.

Further, the pilot program will specify management reports that can be used in the administration and assessment of inspection and correction progress which Pacific Power undertakes.



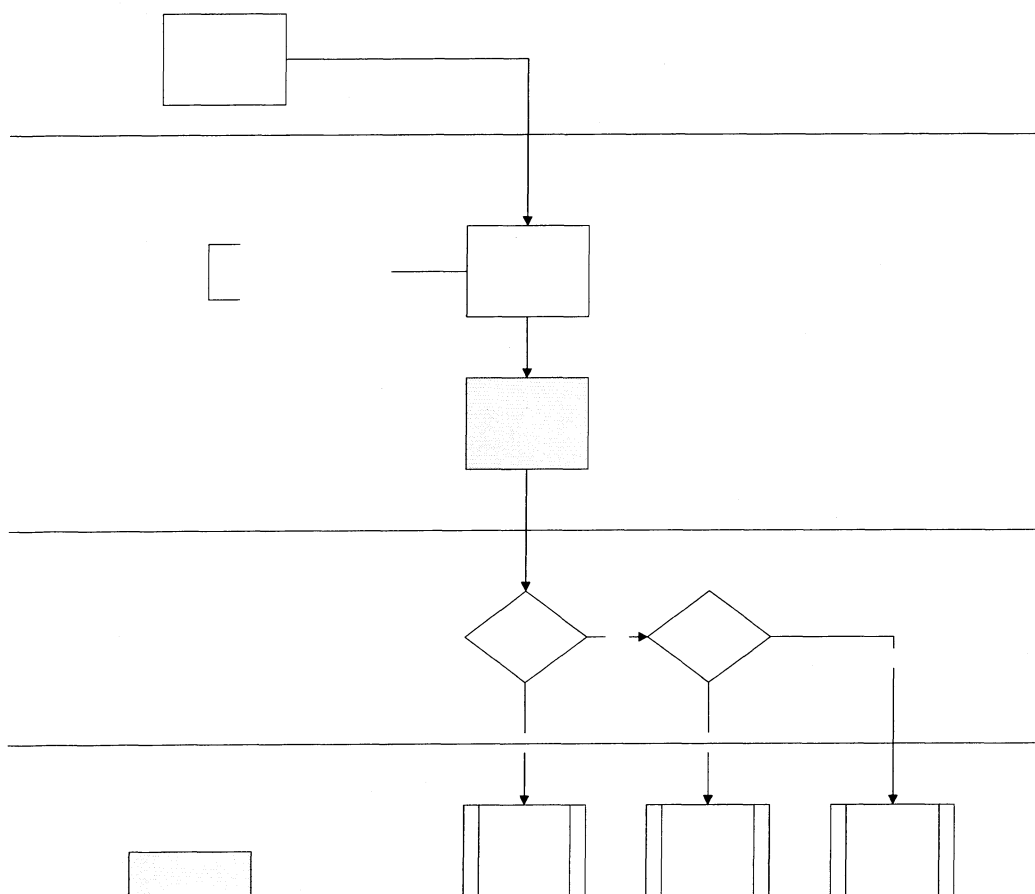
The proposed effective date would be May 8, 2007, for conditions discovered retroactive to January 1, 2007 and would stay in effect until December 31, 2009 or until changes are made to the UE 94 service quality measures. Either OPUC safety staff or Pacific Power can request discontinuance of the pilot program.

2.0 INSPECTIONS

Inspection activities begin the process which includes early identification of areas that will be inspected and sharing inspection plans with the joint pole users, thus providing the basis for future coordination of inspection and correction activities. Pacific Power will designate the annual inspection areas in advance of the start of the year.

Additionally, in order to leverage inspections performed at company poles, additional detail will be captured to support correction plans being developed early in the process. The inspector will identify the most likely party to correct each condition, fundamentally identifying whether that correction is the company's responsibility or that of a joint pole user.

The diagram bellow outlines the current inspection process and includes the additional step identifying the correcting party in "yellow" (shaded).



3.0 CLASSIFICATION OF CONDITIONS AND PRIORITIZATION OF REPAIRS

Pacific Power has reviewed the company 'condition types' with respect to the NESC code and other situations that record network conditions but are not referenced in NESC code. Non-NESC conditions will be excluded from any reporting to OPUC safety staff and will not be included in status or progress reports.

The remaining condition types represent network NESC conditions and will fall into three categories:

- Conditions that pose imminent danger and must be repaired promptly
- Conditions that must be repaired within two-years of discovery
- Conditions that pose little or no foreseeable risk of danger to life or property that can be corrected during the next major work activity or within four years of discovery whichever comes first.

Annually the company will present a status report to OPUC safety staff that shows company/district conditions that have been recorded, cleared, outstanding balances and average age of conditions.

Appendix A shows the NESC conditions types and how they are classified as imminent danger, repair within two years and conditions that would be candidates for deferral if they were not corrected within two years. The variety of condition codes only serve as options for inspectors to use when performing actual inspections.

NESC conditions are recorded in the company data base called Facility Point Inspection Database (FPI) and include several attributes such as:

- condition type (primary/secondary)
- date recorded
- date corrected
- type of inspection (safety or detailed)
- who performed the inspection
- district / map reference
- specific remarks about the condition

The pilot program would continue to have the inspectors capture NESC conditions in the same manner using current standards and training. The back-end prioritization of repairs by management will determine when they will be repaired and will conform to the criteria described above. Only lower priority NESC conditions will be candidates for deferral beyond the two-year period.



The company will also examine the existing outstanding (legacy) conditions at December 31, 2006 and determine the optimum timeframe for correction however will not be limited to having them repaired by December 31, 2007.

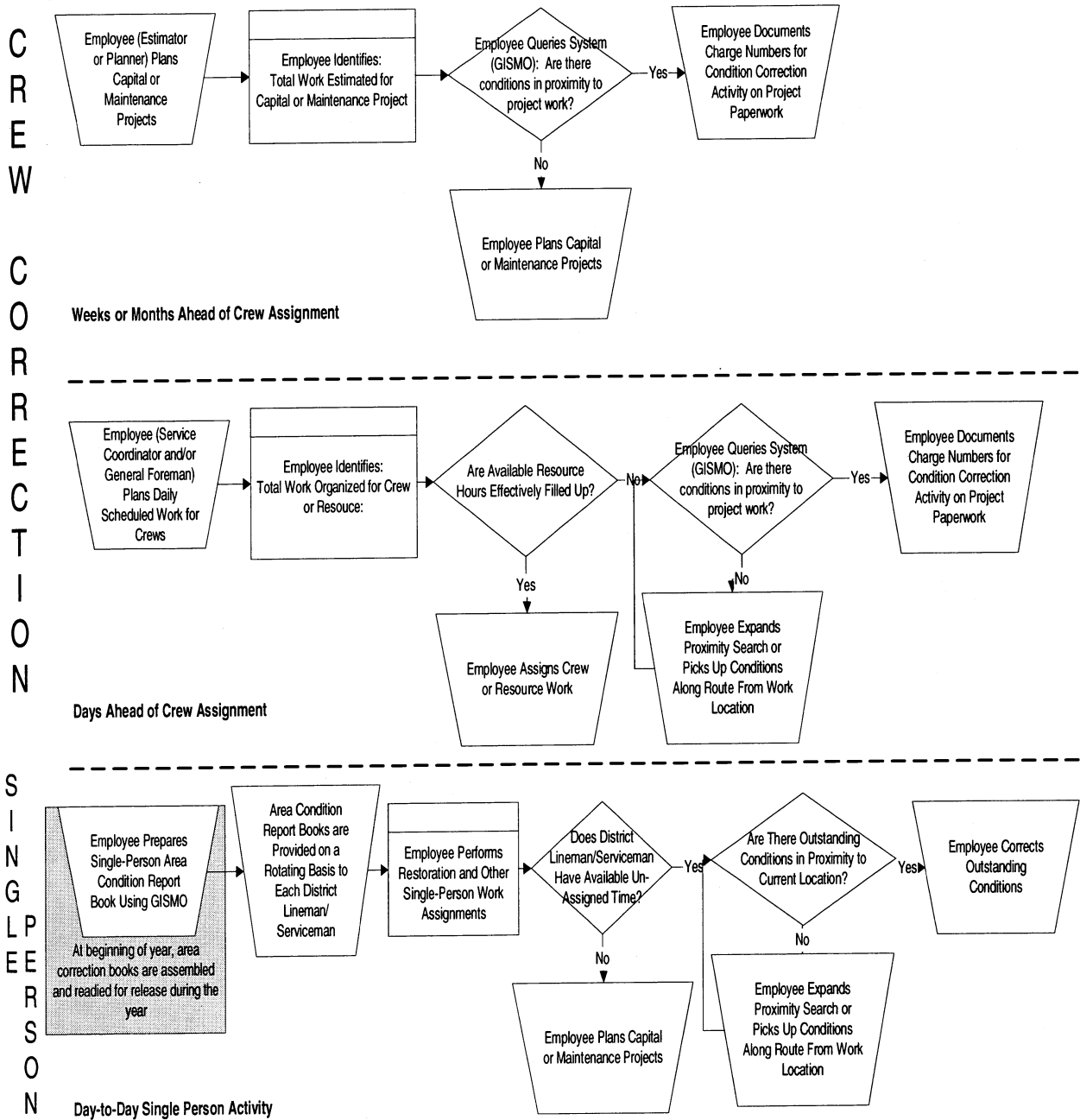
4.0 PLAN OF CORRECTION

Significant improvements in organizing utility work and optimizing crew scheduling have been implemented at Pacific Power with the advent of geographically-based tools that help bundle work efficiently. This bundling is handled using the company's Geographic Information System Maintenance Organizer (GISMO) tool which gives work planners, in spatial or tabular form, a method to optimize plan of corrections. Within established parameters, a planner can group work requests (construction/maintenance/outstanding NESC conditions) that require certain sized crew resources and include outstanding NESC conditions within proximity to each other. Therefore, conditions that have been postponed for repair will not be automatically delayed until the very end of the timeline for correction but rather will be grouped with other work that takes place in the general vicinity. Pacific Power believes the proposed prioritization of repair rules will bring about economic benefits without compromising safety to the public or workers.

Prioritization of repairs shall recognize conditions that are determined imminent danger and must be repaired promptly while other conditions shall be repaired within two-years from date of discovery unless they are low risk to life or property which can be repaired during the next work activity or within four years of discovery whichever comes first. Pacific Power management and OPUC safety staff will jointly monitor the balance of outstanding conditions. Outstanding balances will be assessed at the end of each year to determine if the plan of correction is reasonable.

The chart below depicts the company process on managing corrections.

Process Diagram for Leveraging Corrections within Regular Work Routine



5.0 10-YEAR UNDERGROUND INSPECTION CYCLE

Pacific Power is recommending moving to a 10-year inspection cycle for underground facilities as described in the Division 24 rules except for Portland downtown underground which will remain on a quarterly cycle. Oregon underground facilities have been through 2 complete 4-year cycles involving visual inspection of underground vaults, pad-mount transformers, switches and terminals.

Recent annual inspection results are not finding many NESC conditions as seen in the chart below:

Oregon Underground Inspections and Conditions Found by Calendar Year

	Calendar Year				
	2002	2003	2004	2005	2006
Inspections	12,136	11,113	15,039	20,997	20,911
Conditions Found	1,113	1,053	1,006	1,330	892
Conditions Found / Inspections	9.2%	9.5%	6.7%	6.3%	4.3%

Pacific Power re-activated all secondary underground facility points in 2004 which increased the number of facility points requiring inspections. The chart indicates that even with increased facility point and inspection counts, the number of underground conditions being found each year is decreasing. This can be primarily attributed to Pacific Power having performed complete cycle inspections on the underground system twice. Pacific Power is finding less than 50% of the number of conditions found in 2002 as a percentage of the inspections performed.

Pacific Power feels comfortable moving to 10-year inspection cycle based on the data above. Also, Pacific Power visits underground facility points each time there is a fault on underground cable. Only the inspections performed during the formal program are recorded in the Facility Point Inspection database. Since fewer conditions are being found and facilities are visited any time an outage occurs, it would be prudent to move to a 10 year underground inspection cycle.

6.0 SUGGESTED REPORTS TO MANAGE AND EVALUATE STATUS OF INSPECTION AND CORRECTION PROGRAMS:

The company recognizes condition reports need to include many dimensions of data in order to manage, monitor and evaluate the three-tier prioritization model. Preliminary specifications of reports that will provide such functionality are identified below.

- Summary report of outstanding NESC conditions by priority and by responsible party
- Conditions found during last period by priority and by responsible party
- Average age of conditions by priority, condition type and responsible party
- Planned completion dates by company by condition priorities by geographic location
- Comparison of next activity company to responsible party sorted by descending age
- Annual summary reports showing actual/budget maintenance expenditures for transmission & distribution regular line maintenance and a separate report for corrective maintenance. (The majority of outstanding conditions will be repaired under corrective maintenance, but outstanding conditions are also repaired under regular line maintenance and storm repair work orders)

ognos PowerPlay Web Explorer fpi_conditions_summary Cognos

Cube Refreshed on 2:44:41 AM Friday, February 02, 2007

MEASURES as values					2007/Jan							
					Beginning	New Conditions	Cleared	Ending	Average of Age			
Pacific	South PP	Albany	DIST	A	0	1	0	1	0			
				B	3,694	1	22	3,673	389			
				C	3	1	0	4	187			
				Priority	3,697	3	22	3,678	389			
			MAIN	A	0	0	0	0	0			
				B	0	0	0	0	0			
				C	0	0	0	0	0			
				Priority	0	0	0	0	0			
			TRAN	A	0	1	1	0	0			
				B	227	0	0	227	598			
				C	0	0	0	0	0			
				Priority	227	1	1	227	598			
			Dtm					3,924	4	23	3,905	401
			Alturas	DIST	A	0	0	0	0			
					B	2,338	2	59	2,281	361		
					C	60	1	0	61	59		
					Priority	2,398	3	59	2,342	353		
				MAIN	A	0	0	0	0	0		
					B	0	0	0	0	0		
					C	0	0	0	0	0		
Priority	0	0			0	0	0					
TRAN	A	0		0	0	0	0					
	B	0		0	0	0	0					

Example 1: Monthly Condition Summary Report outlining status of all conditions

1	Cube Refreshed on 2:44:41 AM Friday, February 02, 2007							
2	[Dtm][Time][Condition Region Rollup][OR][Geographic Location Rollup][Priority][CLRTV]MEASURES							
3								
4	MEASURES as values		DIST					
5			Beginning	New Conditions	Cleared	Ending	Average of Age	
6	Albany	A	Company 1	100	190	49	241	15
7		A	Company 2	10	59	29	40	16
8		A	Company 3	189	10	52	147	31
9		B	Company 1	190	57	29	218	101
10		B	Company 2	100	15	59	56	79
11		B	Company 3	459	58	152	365	252
12		C	Company 1	125	12	0	137	157
13		C	Company 2	111	15	12	114	367
14		C	Company 3	57	57	0	114	31
15		Priority		0	190	49	141	425
16		Astoria	A	CLRTV	0	0	0	0
17	B		CLRTV	0	490	102	388	524
18	C		CLRTV	0	0	0	0	0

Example: Monthly Status Report by company of correction progress.

MEASURES as values		2006/Dec					2007/Jan					
		Beginning	New Conditions	Cleared	Ending	Average of Age	Beginning	New Conditions	Cleared	Ending	Average of Age	
North PP	Astoria	661	24	39	646	275	646	422	72	996	202	
	Bend	3,374	2	121	3,255	182	3,255	5	525	2,735	178	
	Freewater	251	0	24	227	361	227	1	3	225	394	
	Hermiston	16	582	247	351	35	351	8	28	331	66	
	Hood River	230	0	23	207	152	207	0	0	207	183	
	Madras	8	0	1	7	44	7	22	3	26	56	
	Pendleton	572	593	297	868	105	868	7	80	795	143	
	Portland	2,039	14	14	2,039	255	2,039	2,642	372	4,309	142	
	Prineville	1	6	0	7	37	7	15	20	2	67	
	Redmond	123	6	0	129	109	129	1	4	126	139	
	North PP	35,591	3,100	1,993	36,698	829	36,698	3,632	1,796	38,534	900	
	South PP	Albany	2,152	0	73	2,079	261	2,079	3	19	2,063	290
		Alturas	553	413	39	927	181	927	4	1	930	212
		Coos Bay	1,507	39	134	1,412	205	1,412	13	67	1,358	226
		Corvallis	161	0	2	159	312	159	1	0	160	343
		Cottage Grove	2,069	0	0	2,069	152	2,069	1	13	2,057	183
		Crescent City	2,205	298	132	2,371	254	2,371	36	82	2,325	284
		Dallas	286	0	2	284	230	284	3	1	286	259
		Grants Pass	1,649	60	12	1,697	319	1,697	433	158	1,972	290
Junction City		17	0	0	17	157	17	1	0	18	177	
Klamath Falls		3,173	179	51	3,301	381	3,301	5	7	3,299	411	
Lakeview		487	370	72	785	179	785	0	0	785	210	
Lebanon		1,180	2	6	1,176	249	1,176	4	0	1,180	279	
Lincoln City		1,706	8	106	1,608	156	1,608	0	72	1,536	186	
Medford		791	188	56	923	117	923	350	94	1,179	111	
Roseburg		4,648	9	6	4,651	332	4,651	268	54	4,865	348	
Stayton		95	1	1	95	370	95	0	0	95	401	
Tulelake		1,693	1,292	140	2,845	196	2,845	60	58	2,847	226	
Yreka	9,716	1,351	286	10,781	320	10,781	17	30	10,768	350		
South PP	34,088	4,210	1,118	37,180	275	37,180	1,199	656	37,723	296		
Pacific	75,122	7,311	3,133	79,300	546	79,300	4,832	2,453	81,679	550		

Example: Monthly Status Report by company of correction progress.

7.0 RECOMMENDATION

The company believes the pilot program substantially improves the quality and efficiency of the inspection and correction programs. It aligns the company plan with the pertinent safety rules, and enables the company to effectively leverage its processes and tools to deliver results in the most optimal fashion. OPUC safety staff will monitor the company's performance against the provisions of the pilot program. It will provide a body of information for OPUC safety staff and Pacific Power alike on the ramifications of implementing division 24 changes.

Therefore, it is recommended that the company implement a 10-year inspection cycle for underground facilities (except for Portland downtown underground) and three-tier NESC conditions that do not impact other pole users as soon as possible. OPUC safety staff will be well-positioned to take advantage of the results and integrate them into longer-term solutions.

APPENDIX A: PROPOSED THREE-TIER PRIORITIZATION MODEL, INCLUDING CRITERIA BY CONDITION CODE (3 PAGES)

Row #	Condition Code	Condition	Imminent Danger	Repair within 2 Years	Candidate for Deferral
1	BIRDDMG	LARGE WOODPECKER HOLES #		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
2	BIRDDMG	SMALL WOODPECKER HOLES #			<input checked="" type="checkbox"/>
3	BIRDDMG	BIRD NESTS (LARGE IN PRIMARY)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	
4	BOCAP	CAPACITOR BANK LEAKING	<input checked="" type="checkbox"/>		
5	BOCOARR	JUMPERED OUT - NO GATE			<input checked="" type="checkbox"/>
6	BOCOARR	BURNT CONNECTION	<input checked="" type="checkbox"/>		
7	BOCOARR	BROKEN CUT OUT			<input checked="" type="checkbox"/>
8	BOCOND	FRAYED WIRE	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	
9	BOCOND	FLOATER		<input checked="" type="checkbox"/>	
10	BOCOND	LAYING ON ARM	<input checked="" type="checkbox"/>		
11	BOCOND	BARE SERVICE WIRE	<input checked="" type="checkbox"/>		
12	BOCOND	BROKEN LOOSE TIE WIRE		<input checked="" type="checkbox"/>	
13	BOCOND	COILED SERVICE WIRE HANGING FROM POLE		<input checked="" type="checkbox"/>	
14	BOCORRNG	LOOSE		<input checked="" type="checkbox"/>	
15	BOGRDBND	BROKEN GROUND	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	
16	BOGRDBND	HIGH GROUND ROD		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
17	BOGRDBND	MISSING		<input checked="" type="checkbox"/>	
18	BOGRDBND	HARDWARE NOT BONDED			<input checked="" type="checkbox"/>
19	BOGRDBND	LOOSE GROUND WIRE - ABOVE/BELOW ARM		<input checked="" type="checkbox"/>	
20	BOGRDBND	BURNED OPEN AT DISTRIBUTION ARM		<input checked="" type="checkbox"/>	
21	BOGRDBND	BURNED OPEN AT POLE TOP		<input checked="" type="checkbox"/>	
22	BOGRDBND	BOND BROKEN AT STATIC WIRE/FOG			<input checked="" type="checkbox"/>
23	BOGRDBND	BROKEN MISSING MOLDING			<input checked="" type="checkbox"/>
24	BOGUYANC	SLACK / BROKEN GUY		<input checked="" type="checkbox"/>	
25	BOGUYANC	MISSING/BROKEN GUY GUARD			<input checked="" type="checkbox"/>
26	BOGUYANC	BURIED ANCHOR EYE		<input checked="" type="checkbox"/>	
27	BOGUYANC	NEED SIDEWALK GUY ATTACHMENT			<input checked="" type="checkbox"/>
28	BOGUYANC	GUY TAILS NEED TO BE TRIMMED			<input checked="" type="checkbox"/>
29	BOGUYANC	ANCHOR PULLED		<input checked="" type="checkbox"/>	
30	BOGUYANC	NEED TO INSTALL DOWN GUY		<input checked="" type="checkbox"/>	
31	BOINSUL	BROKEN INSULATOR	<input checked="" type="checkbox"/>		
32	BOINSUL	LOOSE OR MISSING HARDWARE ON PIN		<input checked="" type="checkbox"/>	
33	BOINSUL	BAD INSULATOR DEAD END			<input checked="" type="checkbox"/>
34	BOLIGHT	LOOSE CONDUIT			<input checked="" type="checkbox"/>
35	BOLIGHT	LOOSE HARDWARE		<input checked="" type="checkbox"/>	
36	BOLIGHT	NEEDS NEW MAST			<input checked="" type="checkbox"/>
37	BOLIGHT	LIGHT HANGING BY WIRES	<input checked="" type="checkbox"/>		
38	BOLIGHT	STREET LIGHT NOT BONDED			<input checked="" type="checkbox"/>
39	BOLIGHT	NEEDS CONDUIT			<input checked="" type="checkbox"/>
40	BOPOLE	DAMAGE REJECT REPLACE	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	
41	BOPOLE	ROTTED POLE TOP, CAN'T FRAME DOWN		<input checked="" type="checkbox"/>	
42	BOPTSW	BURNT CONNECTION		<input checked="" type="checkbox"/>	
43	BORECL	LEAKING OIL	<input checked="" type="checkbox"/>		
44	BORECL	BURNT CONNECTION		<input checked="" type="checkbox"/>	

Note: Any condition could be classified as 'imminent danger' at the time of inspection based on severity of condition.

APPENDIX A: PROPOSED THREE-TIER PRIORITIZATION MODEL, INCLUDING CRITERIA BY CONDITION CODE

Row #	Condition Code	Condition	Imminent Danger	Repair within 2 Years	Candidate for Deferral
45	BOREG	BY PASS SWITCH BROKEN/BURNING		<input checked="" type="checkbox"/>	
46	BORISER	BROKEN CONDUIT	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	
47	BORISER	JOINT SEPARATED	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	
48	BORISER	CLIMBABLE RISER		<input checked="" type="checkbox"/>	
49	BORISER	LOOSE HARDWARE		<input checked="" type="checkbox"/>	
50	BORISER	TRIPPING HAZARD-STANDOFF BRACKET		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
51	BORISER	MISSING GROUNDING STRAP			<input checked="" type="checkbox"/>
52	BORISER	MISSING CONDUIT STRAPS		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
53	BORISER	GAP AT GROUND	<input checked="" type="checkbox"/>		
54	BOSECENC	BROKEN BOX / PEDESTAL REPLACE - EXPOSED WIRE	<input checked="" type="checkbox"/>		
55	BOSECENC	MISSING BROKEN LATCH / LOCK	<input checked="" type="checkbox"/>		
56	BOSVCENT	HOUSE KNOB PULLED OUT		<input checked="" type="checkbox"/>	
57	BOSVCENT	BARE CONNECTORS @ WEATHER HEAD	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	
58	BOSVCENT	BROKEN SERVICE GRIP		<input checked="" type="checkbox"/>	
59	BOSVCENT	BROKEN SERVICE ATTACHMENT		<input checked="" type="checkbox"/>	
60	BOSVCENT	CONDUIT SEPARATED AT METER BASE		<input checked="" type="checkbox"/>	
61	BOSVCENT	BAD ORDER METER BASE/ PULLED AWAY		<input checked="" type="checkbox"/>	
62	BOUG	BO CONDUCTOR		<input checked="" type="checkbox"/>	
63	BOUG	BAD PRIMARY UG ELBOW		<input checked="" type="checkbox"/>	
64	BOUG	BAD ORDER SPLICE		<input checked="" type="checkbox"/>	
65	BOXARM	ARM IS SPLIT/CRACKED/ROTTEN	<input checked="" type="checkbox"/>		
66	BOXARM	MISSING/LOOSE HARDWARE		<input checked="" type="checkbox"/>	
67	BOXARM	SQUATTER PIN		<input checked="" type="checkbox"/>	
68	BOXARM	ROTTEN, HARDWARE PULLING THROUGH	<input checked="" type="checkbox"/>		
69	BOXARM	ARM BRACE BROKEN/MISSING/LOOSE	<input checked="" type="checkbox"/>		
70	BOXARM	BADLY TWISTED ARM		<input checked="" type="checkbox"/>	
71	BOXARM	BURNED		<input checked="" type="checkbox"/>	
72	BOXARM	SPLIT/CRACKED, CAN BAND		<input checked="" type="checkbox"/>	
73	BOXARM	SPLIT/CRACKED, REPLACE		<input checked="" type="checkbox"/>	
74	BOXBRACE	LOOSE BRACES		<input checked="" type="checkbox"/>	
75	BOXBRACE	BROKEN BRACES	<input checked="" type="checkbox"/>		
76	BOXBRACE	LOOSE X BRACE ATTACHMENT HRDW		<input checked="" type="checkbox"/>	
77	BOXBRACE	MISSING X BRACE CENTER CLAMP		<input checked="" type="checkbox"/>	
78	BOXBRACE	LOOSE HARDWARE		<input checked="" type="checkbox"/>	
79	BOXBRACE	END SPLIT		<input checked="" type="checkbox"/>	
80	BOXFRMR	LEAKING	<input checked="" type="checkbox"/>		
81	BOXFRMR	BROKEN BUSHING		<input checked="" type="checkbox"/>	
82	BOXFRMR	REPOSITION ON PAD	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	
83	BOXFRMR	BROKEN LATCH	<input checked="" type="checkbox"/>		
84	BOXFRMR	BURNING CONNECTIONS		<input checked="" type="checkbox"/>	
85	CLEAR	DRIP LOOP LESS THAN 18"/12"		<input checked="" type="checkbox"/>	
86	CLEAR	LOW SVC OVER DRIVEWAY/ROADWAY/YARD		<input checked="" type="checkbox"/>	
87	CLEAR	LESS THAN 8' CLEARANCE CLIMBABLE		<input checked="" type="checkbox"/>	
88	CLEAR	SVC TO WINDOW /SIGN		<input checked="" type="checkbox"/>	

Note: Any condition could be classified as 'imminent danger' at the time of inspection based on severity of condition.

APPENDIX A: PROPOSED THREE-TIER PRIORITIZATION MODEL, INCLUDING CRITERIA BY CONDITION CODE (3 PAGES)

Row #	Condition Code	Condition	Imminent Danger	Repair within 2 Years	Candidate for Deferral
89	CLEAR	CLEARANCE TO UNATTACHED TO POLE			<input checked="" type="checkbox"/>
90	CLEAR	LOW PRIMARY/ SECONDARY	<input checked="" type="checkbox"/>		
91	CLEAR	CONDUCTOR TO BUILDING/ SIGN	<input checked="" type="checkbox"/>		
92	CLEAR	GUY WIRE AGAINST NEUTRAL/ SVC		<input checked="" type="checkbox"/>	
93	CLEAR	TOP OF RISER TOO CLOSE TO CATV/TELCO			<input checked="" type="checkbox"/>
94	CLEAR	SERVICE RUBBING ON HOUSE/ GUTTER		<input checked="" type="checkbox"/>	
95	COOTHER	POLE TOP FEATHERED NEEDS EVAL			<input checked="" type="checkbox"/>
96	COOTHER	POLE TOP SPLIT USE SPLIT BOLT			<input checked="" type="checkbox"/>
97	COOTHER	AERIAL/ CROSSING MARKER MISSING			<input checked="" type="checkbox"/>
98	LOWWHEAD	18" CLEARANCE VIOLATION POST '77 NESC			<input checked="" type="checkbox"/>
99	LOWWHEAD	12" CLEARANCE VIOLATION PRE '77 NESC			<input checked="" type="checkbox"/>
100	LOWWHEAD	9'6" GROUND CLEARANCE POST '77 NESC			<input checked="" type="checkbox"/>
101	LOWWHEAD	8' GROUND CLEARANCE PRE '77 NESC		<input checked="" type="checkbox"/>	
102	OWNERPRB	ANTENNA ATTACHED TO MAST			<input checked="" type="checkbox"/>
103	OWNERPRB	MAST BROKEN		<input checked="" type="checkbox"/>	
104	OWNERPRB	MAST NOT GUYED			<input checked="" type="checkbox"/>
105	RWENRCH	SIGN ON POLE			<input checked="" type="checkbox"/>
106	RWENRCH	CUSTOMER-OWNED ATTACHED			<input checked="" type="checkbox"/>
107	RWENRCH	BASKETBALL HOOP ATTACHED TO POLE			<input checked="" type="checkbox"/>
108	RWENRCH	CUST OWNED LGT OR WIRE ATTACHED TO POLE			<input checked="" type="checkbox"/>
109	RWENRCH	ANTENNA ATTACHED TO POLE			<input checked="" type="checkbox"/>
110	TREECLMB	CLIMBABLE TREE	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	
111	TREECLMB	BY SCHOOL	<input checked="" type="checkbox"/>		
112	TREECLMB	BY DAY CARE	<input checked="" type="checkbox"/>		
113	TREECLMB	BY CHURCH	<input checked="" type="checkbox"/>		
114	TREECLMB	TREE HOUSE	<input checked="" type="checkbox"/>		
115	TREETRIM	LIMB/TREE DEFLECTING OR HARD AGAINST SVC			<input checked="" type="checkbox"/>
116	TREETRIM	VINE ON POLE			<input checked="" type="checkbox"/>
117	TREETRIM	TREES BURNING IN PRIMARY	<input checked="" type="checkbox"/>		
118	TREETRIM	TREES BURNING IN OPEN SECONDARY		<input checked="" type="checkbox"/>	
119	UBPROB	BAD CROSS ARM	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	
120	UBPROB	BROKEN INSULATOR		<input checked="" type="checkbox"/>	
121	UBPROB	BAD DEAD-END		<input checked="" type="checkbox"/>	
122	UBPROB	BROKEN TIE WIRE		<input checked="" type="checkbox"/>	
123	UBPROB	MISSING HARDWARE		<input checked="" type="checkbox"/>	
124	UBPROB	BROKEN/CUT GROUND BOND		<input checked="" type="checkbox"/>	
125	UBPROB	BAD CONDUCTOR		<input checked="" type="checkbox"/>	
126	UBPROB	BAD GUY/ANCHOR		<input checked="" type="checkbox"/>	
127	WASHOUT	BACKFILL POLE		<input checked="" type="checkbox"/>	
128	WASHOUT	ROCKS/RIFFRAFF POLE		<input checked="" type="checkbox"/>	

Note: Any condition could be classified as 'imminent danger' at the time of inspection based on severity of condition.