



Portland General Electric Company

Legal Department

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Barbara W. Halle

Associate General Counsel

November 13, 2008

Via Electronic Filing and U.S. Mail

Oregon Public Utility Commission

Attention: Filing Center

550 Capitol Street NE, #215

PO Box 2148

Salem OR 97308-2148

Re: AR 528

Attention Filing Center:

Enclosed for filing in the captioned docket are an original and one copy of:

- **COMMENTS OF PORTLAND GENERAL ELECTRIC COMPANY**

This document is being filed by electronic mail with the Filing Center. An extra copy of the cover letter is enclosed. Please date stamp the extra copy and return to me in the envelope provided.

This document is being served upon the AR 528 service list.

Thank you in advance for your assistance.

Sincerely,

A handwritten signature in black ink that reads "B. Halle". The signature is fluid and cursive, with a large initial "B" and a long, sweeping underline.

BARBARA W. HALLE

BWH:jbf

Enclosures

cc: Service List-AR 528

CERTIFICATE OF SERVICE

I hereby certify that I have this day caused **COMMENTS OF PORTLAND GENERAL ELECTRIC COMPANY** to be served by electronic mail to those parties whose email addresses appear on the attached service list, and by First Class US Mail, postage prepaid and properly addressed, to those parties on the attached service list who have not waived paper service from OPUC Docket No. AR 528.

Dated at Portland, Oregon, this 13th day of November 2008.



BARBARA W. HALLE

SERVICE LIST

OPUC DOCKET AR 528

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BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

AR 528

In the Matter of)
)
Amending OAR 860-024-0010)
Regarding Arc Flash Protection Rule)
in 2007 NESC) COMMENTS OF
PORTLAND GENERAL ELECTRIC
COMPANY

Portland General Electric (“PGE”) supports Staff’s proposed rule that will extend the compliance deadline for the Arc Flash Rule to January 1, 2010, and is taking steps to ensure it will be in compliance with the Rule by that date.

In addition, PGE wishes to correct some erroneous dates that were inadvertently included in the hotsticking and rubber gloving exhibits it submitted at the hearing on November 6, 2008 in this docket. PGE requests that the exhibits attached to these comments be accepted as the corrected versions, and the original exhibits be discarded. This will make no substantive difference in the purpose of the exhibits, which is to demonstrate differences in work methods between Oregon, where we are required to use hot sticking, and other jurisdictions closer to where the revisions of the NESC originate, where rubber gloving is used for the same work.

Finally, PGE appreciates Staff’s efforts to work with the industry to achieve an outcome that takes multiple relevant factors into consideration.

DATED this 13th day of November 2008.

Respectfully Submitted,

/s/ BARBARA W. HALLE

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Electrical Hotline Work Methods

Rubber Gloving









Electrical Hotline Work Methods

Hot Sticking

Live Line Tools



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11/03/2008





