

PBOT

PORTLAND BUREAU OF TRANSPORTATION

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Steve Novick Commissioner **Leah Treat** Director

October 2, 2015

Public Utility Commission of Oregon
Attn: Filing Center
201 High Street SE
PO Box 1088
Salem, Oregon 97308-1088

RE: UE 300 - Investigation into PGE Advice Filing No. 15-09, Rule C Customer Attachment to Facilities

To Whom It Concerns:

I am writing to indicate the City of Portland's general agreement with and support for the comments submitted in this matter on September 25, 2015 by Senior Assistant Attorney General David B. Hatton on behalf of the Oregon Department of Transportation (ODOT). The purpose of this letter is to provide additional information reflecting upon ODOT's redlined version of Portland General Electric's Fourth Supplemental Filing of Advice, dated August 7, 2015. As with ODOT, if the City and PGE were able to successfully resolve these remaining issues, the City objections to PGE's filing would be largely resolved.¹

- Sec. 7.A - Cost Responsibilities

The City joins in ODOT's expressed concerns regarding the requirement of advance payments. The City would note that this issue is not restricted to state agencies. It is also applicable to other subdivisions of the State, including local governments. Accordingly, the City would ask that this language be modified to read "Company will not require advance payment for any relocation, removal or rearrangement of Facilities requested by the State of Oregon or its political subdivisions."

- Sec. 7.B – Requirements for Public Works Projects

Portland supports ODOT's proposed language change addressing permits.

¹ The City continues to harbor questions regarding the interplay between PGE's tariff filing and the well-established Oregon case law regarding treatment of utility relocation costs when required in the legitimate exercise of government authority.



The Portland Bureau of Transportation fully complies with Title VI of the Civil Rights Act of 1964, the ADA Title II, and related statutes and regulations in all programs and activities. For accommodations, complaints and information, call (503) 823-5185, City TTY (503) 823-6868, or use Oregon Relay Service: 711.

- Sec. 7.B.3 – Requirements for Public Works Projects

Portland supports ODOT's proposed language change addressing permits.

- Sec. 7.D.1 – Exceptions to Sec. 7.A General Rule

Portland supports ODOT's proposed language adding a sixth circumstance to clarify the interplay between the General Rule under Sec. 7.A and the Public Works exception under Sec. 7.B.

- Sec. 7.D.2 – Scheduled Crew Hours

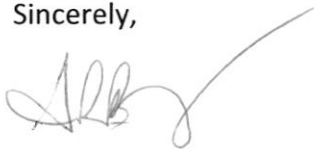
Portland supports ODOT's proposed language change addressing permits.

- Sec. 7.F – Temporary Relocations

Portland supports ODOT's proposed language clarify the interplay between the General Rule under Sec. 7.A and the Public Works exception under Sec. 7.B in the context of Temporary Relocations.

The City intends to fully participate in this important matter to address issues of concern to Portland and its residents.

Sincerely,

A handwritten signature in black ink, appearing to read 'Alex Bejarano', with a long, sweeping flourish extending to the right.

Alex Bejarano, PE
Interim Development Permitting Division Manager