



May 2, 2006

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

Attention: Vikie Bailey-Goggins, Administrator  
Regulatory and Technical Support

RE: Docket No. AR 506 – Joint Use and Safety Rules

Dear Ms. Bailey-Goggins,

Enclosed for filing in the above-captioned docket is PacifiCorp's First Round Comments. PacifiCorp acknowledges that the due date for these comments was May 1, 2006 and the Company respectfully requests the Commission accept these comments a day late.

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

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

By Fax: (503) 813-6060

By regular mail: Data Request Response Center  
PacifiCorp  
825 NE Multnomah, Suite 800  
Portland, OR 97232

Please direct informal questions with respect to this filing to Laura Beane at 503-813-5542.

Sincerely,

A handwritten signature in cursive script that reads "Andrea L. Kelly". The signature is written in black ink and includes a stylized initial "AK" at the end.

Andrea L. Kelly  
Vice President, Regulation

Enclosures

Cc: AR-506 Service List

CERTIFICATE OF SERVICE

AR 506

I certify that I have, this day, served Division 24 Initial Comments of PacifiCorp, dated May 2, 2006, upon all participants of record in this proceeding by electronic mail as indicated on the attached service list.

Dated at Portland, Oregon, this 2<sup>nd</sup> day of May, 2006.



/s/ Cece Coleman

Cece Coleman

On behalf of the Staff of  
Pacific Power & Light

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**BEFORE THE  
PUBLIC UTILITY COMMISSION OF OREGON**

**AR 506**

**In the Matter of a Rulemaking to Amend )  
and Adopt Permanent Rules in OAR 860, )  
Division 24 and 28, Regarding Pole )  
Attachment Use and Safety )**

**Div 24 INITIAL COMMENTS  
OF PACIFICORP  
May 2, 2006**

PacifiCorp respectfully submits the following initial comments regarding the Commission's proposed Division 24 safety rules issued on or about March 7, 2006. PacifiCorp commends the Commission for initiating this process and supports, in large part, the Commission staff's efforts to establish more comprehensive safety and joint use rules that accommodate competitive changes in the market and ensure that Oregon's utility lines and facilities are operated, and maintained in a safe and efficient manner.

**BACKGROUND**

PacifiCorp provides low-cost electricity to over 1,600,000 customers in its 136,000 square mile service territory, which includes Utah, Oregon, Wyoming, Washington, Idaho, and California. PacifiCorp serves over 527,000 customers in Oregon. The provision of electric service to these commercial, industrial and residential customers requires a vast web of electric distribution and transmission lines.

PacifiCorp's distribution system in Oregon transmits power from the company's substations and delivers it to commercial, industrial and residential customers. The electricity is transmitted over a network of pole lines and underground cable, including over 350,000 distribution poles in Oregon.

Reliable provision of electric service and the safety of the public and PacifiCorp's employees are key concerns of PacifiCorp when operating its electric distribution network. At the same time, PacifiCorp is required by law to provide other parties access to distribution network facilities so that those companies may provide various services, such as telephony, cable television, broadband Internet access, and the like, to the homes of Oregonians. In order to continue to provide electric service safely and efficiently, while also facilitating the provision of these other services by permitting access to PacifiCorp's pole plant, PacifiCorp supports the efforts of the Commission to promulgate and maintain rules that deter and mitigate illegal and unsafe attaching practices and parties, provide clear guidance to all parties regarding attachment rules, rates and procedures, and that provide just compensation to pole owners for the use of their poles, and thereby a fair reduction in the revenue requirement for retail electric rates.



### **COMMENTS**

PacifiCorp has, for sometime, been actively participating as a member of the Oregon Joint Use Association (OJUA). In a collaborative effort to bring industry participants together on joint use issues, the OJUA has facilitated what PacifiCorp believes to be a consensus position on the draft Division 24 rules. Since the OJUA is expected to submit initial comments to the Commission, reflecting the consensus position of the industry and since PacifiCorp contributed significant time and energy to that effort, PacifiCorp wishes to take this opportunity to support the Division 24 Comments being submitted by the OJUA. In the unlikely event that PacifiCorp should disagree with any comment or position taken by the OJUA in its initial comments filed today, PacifiCorp wishes to reserve the right to address such concern(s) in reply comments.

## CONCLUSION

PacifiCorp looks forward to reviewing the comments and proposals of others, and the opportunity to comment further as this proceeding continues.

Respectfully submitted,

  
Cece L. Coleman, 

Senior Counsel

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