



May 2, 2006

Public Utility Commission of Oregon
Attn: Filing Center
550 Capitol Street NE #215
PO Box 2148
Salem OR 97308-2148

Re: Docket AR 506

To whom it may concern:

Attached and electronically filed as specified in Order No. 04-753, please find Coos-Curry Electric Cooperative's comment(s) to be considered prior to final rulemaking on Division 860-024-016.

Thank you for your consideration.

Sincerely,

Linda L. Spurgeon
GIS/Joint Use Administrator

Enclosure: Docket AR 506 comments form

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**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

AR 506

<p>In the Matter of a Rulemaking to Amend and Adopt Permanent Rules in OAR 860, Divisions 24 and 28, Regarding Pole Attachment Use and Safety.</p>	<p>))))</p>	<p style="text-align: center;">COMMENTS OF Coos-Curry Electric Cooperative, Inc PO Box 1268 43050 Hwy 101 Port Orford, OR 97465</p>
<p>860-024-016(8)</p>		<p>The OJUA has suggested that Item 8 of 860-024-016 be removed from Division 860-024-016. Coos-Curry Electric Cooperative, Inc.'s (CCEC) allocated service territory is a mix of rural and urban development with substantial vegetation growth issues. CCEC's right-of-way clearing program is a monetary commitment that needs to be offset and contributed to by those operators permitted to attach to CCEC facilities and thus benefit from clear right-of ways. We would like to encourage this rulemaking endeavor/decision to leave 860-024-016(8) as it is currently written. Without this language electric utility operators will have very little leverage in trying to enforce that attaching parties participate financially in the burden of maintaining clear right-of-ways. There are many instances of trees falling into CCEC's rights-of-way striking our conductor, which will break the electric conductor and leave the pole standing. If communication cable(s) is attached to the pole, that cable typically will not break, which will cause the electric utility pole owner to be torn down in the vicinity causing a much more expensive rebuild and safety hazard for the public as well as prolonged outage duration. It is possible for power supply pole owners to clear only vegetation tops, which would clear any power clearance violations, but would not alleviate brush and trees from putting strain onto attached communications facilities, and thus the power suppliers' pole plant.</p>