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**Barbara W. Halle**  
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April 23, 2007

***Via Electronic Filing and U.S. Mail***

Oregon Public Utility Commission  
Attention: Filing Center  
P.O. Box 2148  
Salem, OR 97308-2148

**Re: AR 513 – 2007 NATIONAL ELECTRIC SAFETY ADOPTION**

Attention Filing Center:

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

- **SUPPLEMENTAL COMMENTS OF PORTLAND GENERAL ELECTRIC COMPANY.**

This document is being filed by electronic mail with the Filing Center.

An extra copy of this cover letter is enclosed. Please date stamp the extra copy and return it to me in the envelope provided.

Thank you in advance for your assistance.

Sincerely,

A handwritten signature in black ink, appearing to read "B. Halle", written in a cursive style.

**BARBARA W. HALLE**

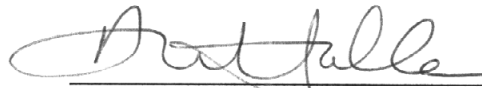
BWH:jbf  
Enclosures

cc: Service List – AR 513

CERTIFICATE OF SERVICE

I hereby certify that I have this day caused **SUPPLEMENTAL 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 513.

Dated at Portland, Oregon, this 23rd day of April 2007.

A handwritten signature in cursive script, appearing to read 'Barbara Halle', written over a horizontal line.

Barbara Halle, OSB No. 88054

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**BEFORE THE PUBLIC UTILITY COMMISSION**

**OF OREGON**

AR 513

|                                      |   |                                 |
|--------------------------------------|---|---------------------------------|
| In the Matter of                     | ) |                                 |
|                                      | ) |                                 |
| Amendment to Adopt the 2007 National | ) | <b>SUPPLEMENTAL COMMENTS OF</b> |
| Electric Safety Code                 | ) | <b>GENERAL ELECTRIC COMPANY</b> |
|                                      | ) |                                 |
|                                      | ) |                                 |

Portland General Electric Company (“PGE”) would like to take the opportunity to file supplemental comments in this proposed rulemaking. As previously indicated, PGE supports the adoption of rules as set forth in the Notice of Proposed Rulemaking Hearing filed on March 14, 2007.

After discussions with Staff regarding the waiver provision mentioned in our earlier comments, PGE suggests the Commission adopt the following rule language in its Final Order in this docket:

**Unless otherwise expressly prohibited by law, the Commission may, for a specific installation or multiple installations with similar characteristics, waive a provision or provisions of the NESC for good cause shown or where equivalent safety can be achieved.**

This language is not intended to address blanket waivers of the rules for all utility

installations. Such requests should be handled in the context of a generally applicable rulemaking requested by an affected entity.

DATED this 23<sup>th</sup> day of April 2007.

Respectfully Submitted,

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