



Oregon

Theodore R. Kulongoski, Governor

Public Utility Commission

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April 23, 2007

Via Electronic Filing and Hand Delivery

OREGON PUBLIC UTILITY COMMISSION
ATTENTION: FILING CENTER
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RE: **Docket No. AR 513**- In the Matter of an Amendment to Adopt the 2007
National Electrical Safety Code.

Enclosed for filing in the above-captioned docket is the Public Utility Commission Staff's Comments. This document is being filed by electronic mail with the PUC Filing Center. Courtesy copies are being provided by email to known interested persons.

/s/ Diane Davis

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Filing on Behalf of Public Utility Commission Staff
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CC by email only: AR 513 Service List

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

AR 513

In the Matter of an Amendment to Adopt) STAFF COMMENTS DATED
the 2007 National Electrical Safety Code.) APRIL 23, 2007

PUC Staff makes the following comments in response to the verbal comments made by other participants at today's hearing:

With regard to the NESC Rule 410A3 effective date of January 1, 2009, Staff requests that the Commission order PUC Staff to perform an investigation as to appropriateness of the January 1, 2009, effective date to determine if an additional time extension is necessary. Based on the comments of others, Staff now agrees that a cost impact analysis and a review of Federal and Oregon OSHA regulations are not necessary. Staff agrees that the investigation needs to be completed after June 1, 2008, but no later than August 1, 2008, to allow sufficient time for appropriate rulemaking, if necessary.

/s/ Jerry Murray

Jerry Murray
Senior Utility Analyst
Utility Safety and Reliability