



October 4, 2006

To: Commission Chair Lee Beyer
Christina Hayes, Administrative Law Judge

From: Sandy Flicker, Oregon Rural Electric Cooperative Association (ORECA)
Tom O'Connor, Oregon Municipal Electric Utilities Association (OMEU)

Re: Dockets AR 506 and AR 510 First Round Comments

ORECA and OMEU have been participating in the Commission's process leading to adoption of new Division 024 rules. We also have representatives and members participating in the Oregon Joint Use Association.

ORECA and OMEU have not filed extensive first round comments in Dockets AR 506 and AR 510. We want you to understand that this is not because we deem these issues to be unimportant. To the contrary, pole attachment issues have become increasingly complex and difficult for small distribution utilities spread across the state such as our members. Therefore, as small utilities with limited resources, we have focused our efforts on the OJUA process to attempt to reach consensus among pole owners and pole users.

We support the efforts to date of the OJUA to reach consensus on proposed rules and we are generally in agreement with OJUA's proposals. We, of course, reserve the right to file comments in the remainder of the AR 506 and AR 510 rulemaking.

We would also like to register our concern about the short time remaining before the deadline of the final hearing on November 8. If we are unable to reach consensus on Division 28, then the deadline should be extended.

Finally, we do not support the addition of wireless issues into AR 506 and AR 510 for many of the same reasons outlined by PUC staff. This would add a whole new layer of complexity into these dockets under a timeframe that is already problematic.

Thank you for your consideration.

OMEU Members:

City of Ashland
City of Bandon
Canby Utility Board
City of Cascade Locks
City of Drain
Forest Grove Light & Power
Hermiston Energy Services
McMinnville Water & Light
Milton-Freewater Light & Power
City of Monmouth
Springfield Utility Board

Oregon's Electric Cooperatives:

Blachly-Lane Electric Cooperative
Central Electric Cooperative
Columbia Basin Electric Cooperative
Columbia Power Cooperative Assn.
Consumers Power Inc.
Coos-Curry Electric Cooperative
Douglas Electric Cooperative
Harney Electric Cooperative
Hood River Electric Cooperative
Lane Electric Cooperative
Midstate Electric Cooperative
Oregon Trail Electric Consumers Coop.
Salem Electric
Surprise Valley Electrification Corp.
Umatilla Electric Cooperative
Umpqua Indian Utility Cooperative
Wasco Electric Cooperative
West Oregon Electric Cooperative