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Barbara W. Halle
Assistant General Counsel

April 20, 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 514 - RULEMAKING AMENDING VEGETATION CLEARANCE
REQUIREMENTS**

Attention Filing Center:

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

- **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 "Barbara W. Halle", written in a cursive style.

BARBARA W. HALLE

BWH:mmd
Enclosures

cc: Service List - AR 514

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

AR 514

In the Matter of)	
)	
Amending Vegetation Clearance)	COMMENTS OF PORTLAND
Requirements for Electric Transmission)	GENERAL ELECTRIC COMPANY
Lines over 50,000 Volts)	

INTRODUCTION

Portland General Electric Company ("PGE") appreciates the opportunity to file comments in this rulemaking.

DISCUSSION OF SPECIFIC ISSUES

PGE has a concern with the proposed modification as currently written. Division 024 would be modified so that any portion of any vegetation, such as a tip of one branch, closer than 7.5 feet from any transmission line above 50,000 volts and less than 200,000 volts, would be a rule violation. Any limited intrusion would also not be allowed within 10 feet of transmission lines above 200,000 volts. While this modification may make sense when considering 230,000 volt or 500,000 volt lines, (since these lines can go to ground if contact is made with vegetation.) this is not the case with 57,000 volt or 115,000 volt lines. Branch tips can be 2.0 feet from the line and would not cause problems for either a 57,000 volt or 115,000 volt line. However, the same branch tip would ground out a 500,000 volt line.

PGE suggests modifying the current Division 024 rule to allow no intrusion within 10 feet for lines at or above 200,000 volts but limited intrusion should be allowed within 7.5 feet for

57,000, 69,000 and 115,000 volt lines. This limited intrusion would be permissible as long as no vegetation is closer than 2.0 feet.

We also strongly recommend this section of Division 024 for transmission lines be revisited and modified as necessary to reflect final FERC / NERC rules when they are published.

CONCLUSION

We appreciate the opportunity to provide these comments in addition to our oral comments at the hearing scheduled for April 23, 2007.

DATED this 20th day of April 2007.

Respectfully Submitted,

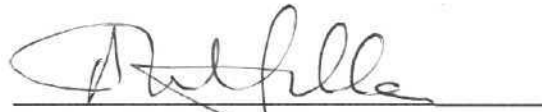


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CERTIFICATE OF SERVICE

I hereby certify that I have this day caused 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 514.

Dated at Portland, Oregon, this 20th day of April 2007.


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