

OREGON JOINT USE ASSOCIATION

The Board of Directors of the Oregon Joint Use Association met with PUC safety staff, Administrative Law Judge Christa Smith, and other interested parties on March 17, 2006 to develop a consensus list of issues to be addressed during the rulemaking process (docket AF 506) with regard to Division 24 of Oregon Administrative Rule Chapter 860, relating to safety. That list follows:

Consensus List for Division 24

Developed March 17, 2006

1. What constitutes a “pattern of noncompliance”? 860-024-0001 (7)
2. Should training of employees be mandated by Division 24? If so, what type of training is required and to what level of proficiency? Should contractors be required to provide evidence of training? 860-024-0011 (1)(b) and (c)
3. What is the priority and timing of corrective work for facilities to be brought into compliance with the NESC? 860- 024-0012
4. Must electric and communication operators coordinate and cooperate on NESC inspections and compliance? Must the annual inspection areas be designated by the electric operators within each electric service territory? If not, how can this be coordinated? 860-024-0011(2)
5. Shall the section relating to “Duties of Electric Supply and Communication Structure Owners” be moved to Division 28. 860-024-0014
6. Must structure owners set construction standards, determine the communication protocols between joint-users, and oversee safety compliance of their structures? 860-024-0014
7. What vegetation management standards are appropriate? 860-024-0016
8. Shall communication operator tree trimming requirements be placed in Division 28? 860-024-001 6(8)
9. How does ORS 758.284 impact these rules? ORS 758.284
10. Cost benefit issues/justification of implementing proposed rules above minimum NESC standards. (*Entire Division*)
11. Wordsmith definitions (frequent, etc.) 860-024-0001
12. Consider appropriateness of including the word “compliance” in the title of section 11. 860-024-0011
13. Consider addition of a generic waiver for specific conditions. 860-024-0012
14. Application of accident reports. 860-024-0050