

April 1, 2022

Public Utility Commission

201 High St SE Suite 100 Salem, OR 97301-3398

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Salem, OR 97308-1088 503-373-7394



AR 638 Participants

RE: April 1, 2022, AHD-Led Workshop

As per the previously issued schedule in this proceeding, a workshop will be held as follows to discuss the redlined proposed rules posted by AHD on March 11, 2022:

DATE: April 7, 2022

TIME: 1:30 PM

BY ZOOM: CLICK ON THE LINK BELOW

LINK TO WORKSHOP

Meeting ID: 874 4573 9624 Passcode: RALsXL7\$zY

Call-in Option

1 971 247 1195 US (Portland) Meeting ID: 874 4573 9624 Passcode: 77404935897

Agenda for Workshop:

Having reviewed the comments filed to date, we issue the following agenda for the workshop:

I. Revised Inspection Requirements –

- **a.** Inspection requirements for pole attachments in high fire zones in OAR 860-024-0018. "Comprehensive facility inspection" vs. "HRFZ detailed inspection."
- **b.** Potential exemption from local tree trimming ordinances.
- c. Requirements that inspections be in person.
- **d.** Reasonable inspection timelines/frequency.
- e. Detailed inspection vs. identifying violations.

II. Interactions between Owners and Occupants –

- **a.** Communications attachments how do we ensure repair is completed; who ultimately has that obligation; requiring qualified inspectors.
- b. Other issues Timelines once notices are issued, dispute resolution if violations are disputed, "telecommunications" vs. "communications," 25% vs. 15% adder.

III. Potential Fire Hazards

- a. Definition of/standard for determining "heightened risk" of wildfire.
- **b.** Minimum Line Clearances potential exemptions due to wind conditions.
- **c.** Appropriate deferrals. For instance, can some repairs be deferred until next major work is completed?
- **IV. Issues specific to smaller utilities** administrative burden of proposed rules on smaller utilities; inspection requirements for poles owned by consumer-owned utilities.

For questions or suggestions, please contact the Administrative Hearings Division by e-mail (<u>puc.hearings@state.or.us</u>). You may also contact me directly at 503-559-0947.

Katharine Mapes

Administrative Law Judge

IF YOU HAVE A DISABILITY AND NEED ACCOMMODATION TO PARTICIPATE IN THIS EVENT, PLEASE LET US KNOW (503) 378-6678, Oregon Relay Service: 7-1-1, or e-mail

puc.hearings@puc.oregon.gov