

October 16, 2000

Cheryl Walker
Administrative Hearings Division
Oregon Public Utility Division
550 Capitol Street NE, Suite 215
Salem, Oregon 97301

BEFORE THE PUBLIC UTILITY COMMISSION OF OREGON, AR 390, DRAFT
RULES COMMENTS

Dear Ms. Walker:

We are writing to provide comments on the P.U.C.'s electricity restructuring process.

The State Association of Electrical Workers has been closely involved in the legislative and P.U.C. process since the beginning of 1997. We participated in the debate because of the urgent need to protect Oregon consumers from the type of unbridled competition that has led to a near collapse of the market in California.

We appreciate the P.U.C.'s leadership in ensuring that a similar situation will not occur in Oregon.

The "Code of Conduct" provisions are of particular importance to the IBEW. We worked closely with the National Electrical Contractors Association to support the cross-subsidization provisions contained in SB1149. Therefore, we have a number of comments and suggestions which we have enclosed.

We would be happy to answer any questions, and would welcome the opportunity to provide any information that might help you implement an effective and responsible approach to electrical restructuring in Oregon.

Sincerely,

Doug Riggs
Vice President, Pac/West Communications
On behalf of the State Association of Electrical Workers
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