



CONSUMERS POWER INC.

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P.U.C.

June 19, 2008

Mr. Jerry Murray  
Public Utility Commission  
550 Capitol St. NE Ste 215  
Salem, OR 97301-2551

Dear Jerry:

Pursuant to comments made at the June 17<sup>th</sup> Arc Flash Hazards Mitigation Workshop please consider the following.

In light of the concern voiced by the cooperative representatives regarding the variety of calculation methods and corresponding variety of results, and the various issues that presents, we are concerned the standard as written will not properly address a given situation in a defensible manner.

Until we have industry agreement on a specific calculation standard to be used in the application of the arc flash study, we recommend a delay in the mandatory implementation date and ask that the PUC take action to seek a delay.

Thank you for your consideration.

Sincerely,

Greg Nervino  
District Manager Lebanon