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2008 JUN 19 A 10:36

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June 18, 2008

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

Dear Jerry:

I am writing on behalf of the 21 Electric Utility Contractor members that are represented by the Northwest Line Chapter, NECA to request that the Commission delay the January 1, 2009 implementation date for the new NESC Arc Flash standards.

We have had concerns and after attending the public hearing yesterday in Salem our concerns were validated in that the Electric Utilities in Oregon continue to express that they do not feel they are able to meet this deadline of January 1, 2009. In the hearing the following issues were identified in no certain order:

- 1) Varying methods to determine Arc Flash
- 2) Discussion on NESC Committee selecting one method
- 3) Tables in NESC maybe incorrect
- 4) Liability issues
- 5) Training requirement
- 6) Purchase of clothing

We concur that the January 1, 2009 compliance requirement is not a realistic time-frame to complete the necessary assessments, train and purchase those needed items of FR clothing should it be determine necessary. For the electric utility contractor we will be relying largely on the Electric Utility to complete the assessments of their systems to

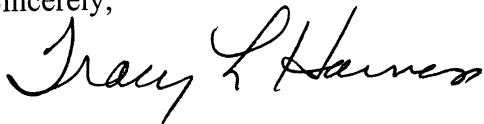
OR PUC  
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determine what type of FR clothing may or may not be required while performing certain types of work on their property. Without proper notification by our customers, the Electric Utility, we will not be able to meet the time line of January 1, 2009.

We would like to see the commission delay the January 1, 2009 requirement until such time that the above concerns regarding the varying methods, questions of the validity of the methods and tables are completely answered. When these concerns are answered and the proper assessments made then purchasing and training can be completed. At this time we see no way of completing this by January 1, 2009.

Thank you for allowing the opportunity for interested parties to comment and we ask the commission for their help in this matter of delaying the implementation date.

Sincerely,

A handwritten signature in black ink that reads "Tracy L. Harness". The signature is written in a cursive style with a large initial "T".

Tracy L. Harness  
Chapter Manager

Cc: Board of Directors