

February 28, 2007

Washington Utilities and Transportation Commission
1300 S. Evergreen Park Drive Southwest
P.O. Box 47250
Olympia, WA 98504-7250

RE: Public Utility Regulatory Act Standards
Standards for interconnection to Electric Utility Delivery Systems
Docket U.E. - 060649

To all interested persons:

The issues herein are in response to the above mentioned topic and are in regards to workers safety. The International Brotherhood of Electrical Workers Local Union 77, which represents over seven thousand (7000) utility workers, is concerned with the type of equipment and warning signage that will be used in relationship to foreign generators connected to an electrical utility system. The following are suggestions that would help insure the safety of high-voltage electrical utility workers as well as the general public.

Required types of disconnect equipment should not be left to the discretion of a foreign generator wishing to connect to a utility system. The type of disconnect equipment should be mandated by the host utility and should be specific disconnect equipment of the host utility's specifications. The rationale behind this is to have disconnect equipment that is easily identified by the qualified electrical utility worker that would be performing maintenance and/or emergency work on the host utility's system. Any and all disconnect equipment should be on the host utility's structures and controlled by the host utility. In addition, all disconnects equipment must have a visual open.

Required signage should be universal among all utilities as to provide high-voltage electrical utility workers an easily recognized warning that a foreign generator exists.

If you have any questions or comments please feel free to contact me at any time. Thank you for your attention to this matter.

Sincerely,

Rick Luiten
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