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IDAHO PUBLIC UTILITIES COMMISSION

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October 26, 2011

VIA HAND DELIVERY

Jean D. Jewell, Secretary
Idaho Public Utilities Commission
472 West Washington Street
Boise, Idaho 83702

Re: Case No. RUL-U-11-01
**UPDATING THE IDAHO PUBLIC UTILITIES COMMISSION'S SAFETY
AND ACCIDENT REPORTING RULES**

Dear Ms. Jewell:

Idaho Power Company ("Idaho Power") appreciates the opportunity to comment on proposed changes to the Idaho Public Utilities Commission's Safety and Accident Reporting Rules (IDAPA 31.11.01), especially Rule 101's proposed adoption of the 2012 National Electric Safety Code ("NESC"). Idaho Power has conducted an extensive review of the 2012 edition of the NESC and supports the adoption thereof in Rule 101.

The 2012 NESC will require several significant changes to Idaho Power's operations – most notably due to revised arc flash ratings, AC live-work minimum approach distances (NESC Table 444-1), and joint trench requirements (NESC Rule 320B5). In anticipation that Idaho Legislature will adopt the 2012 NESC as proposed in Rule 101, Idaho Power is presently modifying its business practices and interactions with other utilities to meet or exceed the new standards set forth in the 2012 NESC.

Very truly yours,

Lisa D. Nordstrom

LDN:csb