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Cc: [Rascon Padilla, Laura \(LNI\)](#); [Farrar, Bradley \(LNI\)](#)
Subject: Ambient Heat Exposure: Stakeholder Comment
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External Email

Good afternoon,

I had the privilege to attend today's stakeholder meeting for the ambient heat exposure. I asked one question during the meeting via chat, but am submitting more thoughts and comments below...

In general, the utility industry in Washington state has a long history of safe work practices and accident prevention programs. Most of the rules proposed make sense and are practiced regularly to take care of our critical employees. For positions that work outside that these rules would apply to, in general, these hazards are real and recognized. Our crews respond in all weather conditions for emergencies and public safety. As an industry, we have chosen to walk the high road and will continue to take care of our employees.

- Is the **same exemption from the wildfire smoke exposure rules appropriate** for this WAC?
- WAC 296-62-09545 (2): seems redundant.
- WAC 296-62-09555: Work/rest cycles:

Emergency situations these rules would create a greater hazard to the public. Example situation:

Location: north central Washington

Temp: greater than 90 degrees fahrenheit from June to Aug

Unplanned power outage in the middle of the day, power goes out to an entire rural community including local hospital, banks, health clinics, grocery stores and homes. Mandatory breaks will create greater hazards for patients at hospitals, clinics, by-standers, and the general public in their homes and businesses with prolonged outage.

Non-emergent situations: increases job times and cost to the public for routine maintenance and customer jobs. This seems unreasonable as we already have practices put into place to protect employees and keep them healthy. This rule could double the time to get maintenance and routine customer work done between the months of June to Aug. It may even create a greater risk if untrained, unqualified people perform the work because they can't afford for the PUD to do it. This is just too much of a burden for the public.

- Acclimatization definition of high heat is **very complicated**: average of preceding five days requires calculations and increases administrative burden. It seems reasonable to

have employees report any concerns, signs or symptoms.

These are just a few things I noticed. Thank you for taking the time to listen today. Please reach out if anything here is unclear or if you want any more from me.

Kind regards,
Katie Pfitzer

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