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OSHA Docket Office
Docket No. OSHA-2016-0013
RIN No.1218-AD00
Technical Data Center
U.S. Department of Labor
Room N-3653
200 Constitution Avenue, NW
Washington, DC 20210

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RE: Docket No. OSHA-2016-0013, RIN 1218-AD00

Please accept for filing the following comments of the National Rural Electric Cooperative Association in the above-captioned docket.

I. Introduction and Background

The National Rural Electric Cooperative Association (NRECA) is the national trade association representing nearly 900 local electric cooperatives. America's electric cooperatives belong to the communities that they serve and comprise a unique sector of the electric industry. From growing suburbs to remote farming communities, electric cooperatives power 1 in 8 Americans and serve as engines of economic development for 42 million Americans across 56 percent of the nation's landscape. Electric cooperatives own and maintain 2.6 million miles of the nation's electric distribution lines, serve 56% of the nation's landmass, support 611,600 American jobs, contribute \$88.4 billion to the U.S. GDP annually and generate more than \$22 billion in federal, state and local taxes.

II. Lock Out/Tag Out in the Electricity Industry

NRECA and its members have reviewed OSHA’s Request for Information (“RFI”) dated May 20, 2019. The regulation on which OSHA is focusing in the RFI is 1910.147 – The Control of Hazardous Energy.

Electric cooperatives are regulated by 1910.269(d) and (m) which apply specifically to “the control of energy sources in installations for the purpose of electric power generation, including related equipment for communication or metering”¹ and “deenergizing of transmission and distribution lines and equipment for the purpose of protecting employees.”²

NRECA members currently use neither control circuit devices nor robotics in the generation, transmission, distribution, communication or metering functions of their work. Within the electric utility industry there is little applicability of 1910.147 in administrative functions.

III. Conclusion

Given that NRECA members work under 1910.269 (d) and (m) for purposes of lock out tag out procedures in our industry, we have no specific comments on OSHA’s Request for Information regarding section 1910.147. We will, however, monitor the rulemaking as it proceeds particularly with regard to the limited administrative functions that may fall under 1910.147. We remain available to answer any questions OSHA may have with regard to Lock Out/Tag Out procedures in the electric utility industry.

¹ 1910.269(d) (1)

² 1910.269(m) (1)

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Respectfully submitted,



Martha A. Duggan
Senior Director, Regulatory Affairs
National Rural Electric Cooperative Association
4301 Wilson Blvd., 11th Floor
Arlington, VA 22203
Office Phone: (703) 907-5848
Mobile Phone: (202) 271-4395
Email: Martha.Duggan@NRECA.coop