



Portland General Electric Company

121 SW Salmon Street • Portland, Oregon 97204
PortlandGeneral.com

November 4, 2008

VIA Electronic Filing
Public Utility Commission of Oregon
550 Capitol St. NE. Ste. 215
Salem, Oregon 97301-2551

Attn: Filing Center

Re: Comments on AR 529, Proposed Rule Changes.

PGE supports the proposed changes as written in Staff's Notice of Proposed Rulemaking Hearing regarding Disconnecting Utility Service and OAR 860-021-0405 (3) Notice of Pending Disconnection of Residential Electric or Gas Utility Service and OAR 860-021-0505 Disconnection Procedures for All Commercial Electric and Gas Utility Customers and All Customers of Large Telecommunication Utilities.

PGE would also like to comment on Qwest's proposed changes submitted to Judge Hardie on October 28, 2008.

Qwest suggests that OAR 860-021-0305 (5) be deleted from the rule. The proposed rule provides that a disconnection is allowed if the utility notices the co-customer or remaining customer that service may be disconnected if no application for service is received. PGE finds that noticing the premises where the joint accounts is/was established of the potential for disconnection prompts the remaining customer to call and sign up for service, thus saving costly expenditures for disconnecting and reconnecting service. PGE supports current rule language that a notice is provided where service is subject to disconnection on a joint account.

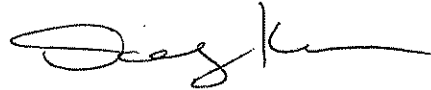
Qwest's proposal for changes to OAR 860-021-0505 that explicitly permit notices to include e-mail notifications makes sense given that computer-based communications are becoming a common way that customers and businesses interact. Expanding this rule to provide for e-mail communications and allowing disconnect notifications to be delivered this way should be an option. PGE believes this change supports a customer's choice to receive information through channels requested by them. PGE finds Qwest's proposed change acceptable.

With respect to Qwest's addition to 860-021-0505 allowing disconnection with no notice where false ID was used to establish service, PGE believes that the existing notices are appropriate.

Should you have any questions or comments regarding this filing, please contact me at (503) 464-7891.

Please direct all formal correspondence and requests to the following email address pge.opucfilings@pqn.com

Sincerely,

A handwritten signature in black ink, appearing to read "Doug Kuns". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Doug Kuns
Manager, Pricing and Tariffs

cc. Diane Davis
Phil Boyle
Deborah Garcia
Email Distribution List

CERTIFICATE OF SERVICE

I hereby certify that I have this day caused **COMMENTS OF PORTLAND GENERAL ELECTRIC COMPANY** to be served by electronic mail to those parties whose email addresses appear on the attached service list, and by First Class US Mail, postage prepaid and properly addressed, to those parties on the attached service list who have not waived paper service from OPUC Docket No. AR 529.

Dated at Portland, Oregon, this 4th day of November 2008.



DOUGLAS KUNS

SERVICE LIST

OPUC DOCKET # AR 529

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