

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

AR 571

Revision to OAR 860-021-0015(1) to)
Clarify Utilities' Retention Period for)
Dispute Records.)
_____)

**COMMENTS
OF THE
CITIZENS' UTILITY BOARD OF OREGON**

June 21, 2013



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OF OREGON**

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Revision to OAR 860-021-0015(1) to)	
Clarify Utilities' Retention Period for)	COMMENTS OF THE CITIZENS'
Dispute Records.)	UTILITY BOARD OF OREGON

The Citizens' Utility Board of Oregon (CUB) appreciates the opportunity to submit comments regarding Revision to OAR 860-021-0015(1) to Clarify Utilities' Retention Period for Dispute Records. CUB writes today in support of Staff's proposed revisions to the rule. CUB has no objection to NWN's comments filed on June 10, 2013, adding "not less than" to the proposed revision, but thinks that the additional language is superfluous because there is no indication in Staff's proposed revision that utility-customer or utility-applicant dispute records cannot be retained after the 36 month retention period has passed. Thank you for the opportunity to participate in this rulemaking.

Respectfully Submitted,



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AR 571 – CERTIFICATE OF SERVICE

I hereby certify that, on this 21st day of June, 2013, I served the foregoing **JUNE 21, 2013 COMMENTS OF THE CITIZENS' UTILITY BOARD OF OREGON** in docket AR 571 upon each party listed in the AR 571 OPUC Service List by email and, where paper service is not waived, by U.S. mail, postage prepaid, and upon the Commission by email and by sending an original and one copy by U.S. mail, postage prepaid, to the Commission's Salem offices.

(W denotes waiver of paper service)

(C denotes service of Confidential material authorized)

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Respectfully submitted,



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