

October 20, 2014

***VIA ELECTRONIC FILING  
AND OVERNIGHT DELIVERY***

Public Utility Commission of Oregon  
3930 Fairview Industrial Drive, SE  
Salem, OR 97302

Attn: Filing Center

**Re: AR 584—PacifiCorp’s Comments on Proposed Changes to OAR 860-021-0135(2)(a)**

PacifiCorp d/b/a Pacific Power (PacifiCorp or Company) appreciates the opportunity to comment on the proposed change to Division 21 rules, OAR 860-021-0135(2)(a).

PacifiCorp agrees with Commission Staff’s proposed change in AR 584 to remove the word “must” and replace it with “may.” This change is critical in the context of the recent change to OAR 860-021-0135 in AR 579, which added provisions for billing adjustments for former customers. This change is also consistent with the language agreed to by the regulated utilities, Commission Staff, Citizens’ Utility Board of Oregon, and Community Action Partnership of Oregon during previous rulemaking workshops.

PacifiCorp’s policy has been to adjust open, active customer accounts. Without this rule change the Company would be obligated to make adjustments to former customer accounts. The obligation to adjust closed accounts would add administrative burden in calculating bills. It would also increase the cost of printing and mailing the bill, attempts to collect the bill, cost of collections, and potentially, write-offs. This is further complicated when the adjustment period affects more than one former customer. Requiring utilities to adjust former customer bills would also lead to customer dissatisfaction, additional calls, complaints, and potential write-offs.

Thank you for the opportunity to provide comments in this proposed rulemaking.

Sincerely,



R. Bryce Dalley  
Vice President, Regulation  
Enclosures