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VIA ELECTRONIC FILING AND U.S. MAIL

PUC Filing Center
Public Utility Commission of Oregon
PO Box 2148
Salem, OR 97308-2148

Re: Docket AR 567

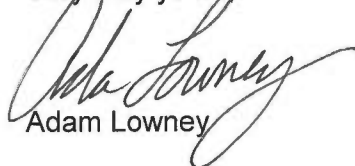
Idaho Power Company ("Idaho Power" or "Company") appreciates the opportunity to comment on the proposed revisions to the Public Utility Commission of Oregon's ("Commission") administrative rules relating to billing error reporting.

Idaho Power agrees with the comments and proposed revisions to draft rule OAR 860-021-0170 that were filed by Northwest Natural Gas Company ("NW Natural") on September 12, 2012. The Company agrees that the edits provide better clarity to the rule. In particular, the proposed edits to subsections (2)(a) and (b) make clear that both conditions set forth in these subsections must be met to trigger the reporting requirement. The proposed rule requires utilities to report major billing errors to the Commission when a single billing error occurs that the utility estimates affected at least 1.5 percent of customer bills issued in any billing month *and* when that same error, in a single billing month, affected a single customer by \$25.00 or more. As written, the draft rule is potentially confusing regarding the interaction of these two requirements and NW Natural's proposed edits provide better clarity.

Idaho Power understands that NW Natural's proposed edits also comport with the intent of the rule, which was to require reporting only when both conditions were met. However, Idaho Power agrees with NW Natural that if the intent of these subsections is to require reporting in the event that either condition is met (rather than both), such a requirement will be unduly burdensome and should not be adopted.

The Company also agrees with NW Natural's proposed revisions to subsection (3) to make clear the timing of the error reporting along with the edits to subsection (4) to make clear the annual reporting requirements.

Very truly yours,



Adam Lowney

cc: Service List

CERTIFICATE OF SERVICE

I hereby certify that I served a true and correct copy of the foregoing document in AR 567 on the following named person(s) on the date indicated below by email addressed to said person(s) at his or her last-known address(es) indicated below.

Onita King
NW Natural Gas Company
ork@nwnatural.com

Dated: September 28, 2012



Wendy McIndoo
Office Manager