

BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

AR 567

In the Matter of)

In the Matter of a Rulemaking Regarding)
Energy Utility Billing Error Reporting)

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

November 20, 2012



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_____)

The Citizens’ Utility Board of Oregon (“CUB”) supports the adoption of the rule proposed by Staff in this docket, with one exception as discussed below. Billing error service quality measures should serve several important functions, which include ensuring that Staff is prepared to address customer calls in the event of an error; ensuring that the utilities are rectifying errors in an appropriate manner; and identifying patterns in billing errors that could indicate systemic problems with the utility’s billing system.

Staff’s proposed rule generally supports the purposes behind billing error service quality measures. The latest proposed revisions to Staff’s draft rule, however, would not impose a reporting obligation on any billing error that did not affect 1.5% or more of its customers, or a single customer by \$5 or more—ever—because reporting in the annual report would be dependent upon the triggering conditions set forth in subsections (2) and (3). Absent an obligation to report all billing errors on an annual basis, the Consumer Services Section may not be in a position to ensure that the utility was appropriately

remediating the error, and to ensure that the error was identified and would not be repeated.

Staff's proposed rule, with CUB's requirement that the annual report include all billing errors, appropriately addresses the issue of identifying systemic problems or trends with utility billing, and is in the best interest of Oregon customers.

CUB appreciates the opportunity to comment in this rulemaking.

Respectfully submitted,



Gordon Feighner
Senior Utility Analyst
Citizens' Utility Board of Oregon
610 SW Broadway, Ste. 400
Portland, OR 97205
(503) 227-1984 phone
(503) 224-2596 fax
gordon@oregoncub.org

AR 567– CERTIFICATE OF SERVICE

I hereby certify that, on this 20th day of November, 2012, I served the foregoing **COMMENTS OF THE CITIZENS' UTILITY BOARD OF OREGON** in docket AR 567 upon each party listed in the AR 567 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 five copies 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)

W AVISTA UTILITIES

SHAWN BONFIELD
PO BOX 3727
SPOKANE, WA 9922-3727
Shawn.bonfield@avistacorp.com

W NW NATURAL

ONITA KING
220 NW 2ND AVE
PORTLAND, OR 97209-3991
ork@nwnatural.com

W MCDOWELL RACKNER & GIBSON

ADAM LOWNEY
419 SW 11TH AVE, STE 400
PORTLAND OR 97205
adam@mcd-law.com

W PACIFIC POWER & LIGHT

BARB COUGHLIN
825 NW MULTNOMAH STE 800
PORTLAND, OR 97232
Barb.coughlin@pacificcorp.com

W PORTLAND GENERAL ELECTRIC

KARLA WENZEL
121 SW SALMON ST, 1WTC0702
PORTLAND, OR 97204
Karla.wenzel@pgn.com

W PACIFIC POWER & LIGHT

JASON HOFFMAN
825 NW MULTNOMAH STE 800
PORTLAND, OR 97232
Jason.hoffman@pacificcorp.com

W PORTLAND GENERAL ELECTRIC

DAVID F WHITE
121 SW SALMON ST, 1WTC1301
PORTLAND, OR 97204
David.white@pgn.com

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Respectfully submitted,

A handwritten signature in black ink, appearing to read 'G. C. McCracken', written in a cursive style.

G. Catriona McCracken, Attorney
#933587
General Counsel/Regulatory Program
Dir.
Citizens' Utility Board of Oregon
610 SW Broadway, Ste. 400
Portland, OR 97205
(503) 227-1984 phone
(503) 274-2596 fax
Catriona@oregoncub.org