BEFORE THE PUBLIC UTILITY COMMISSION

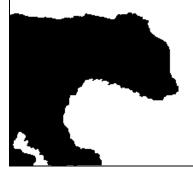
OF OREGON

AR 567

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

THE CITIZENS' UTILITY BOARD OF OREGON



November 20, 2012

BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

AR 567

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In the Matter of In the Matter of a Rulemaking Regarding Energy Utility Billing Error Reporting COMMENTS OF THE CITIZENS' UTILITY BOARD OF OREGON

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 <u>all</u> billing errors on an annual basis, the Consumer Services Section may not be in a position to ensure that the utility was appropriately remedying 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 <u>all</u> 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,

XRI-

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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)

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(C denotes service of Confidential material authorized)

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AR 567 - Certificate of Service NOVEMBER 20, 2012 COMMENTS OF THE CITIZENS' UTILITY BOARD OF OREGON

Respectfully submitted,

r. C. M

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