



**Portland General Electric Company**  
121 SW Salmon Street • Portland, Oregon 97204  
PortlandGeneral.com

November 20, 2012

Public Utility Commission of Oregon  
Attn: Filing Center  
550 Capitol Street, N.E., Suite 215  
Salem, OR 97301-2551

Attn: Filing Center

**RE: In the Matter of Rulemaking on AR 567 Billing Error Reporting – PGE Comments  
On Staff's Final Proposed Rules**

Portland General Electric (PGE) appreciates the opportunity to comment on AR 567, which incorporates a Billing Error Reporting rule into Division 21. PGE's agrees with the most recent draft proposed by Staff, with slight modifications. The billing error reporting rule requires utilities to report billing errors of a given threshold to the OPUC Consumer Services Division on an incident and annual basis. The rule is aimed at identifying potentially systemic billing issues affecting customers so they may be addressed and remedied.

Following are PGE's comments regarding this rule.

The definition of "Billing Error" as proposed in Section 1 of the rule is reasonable; PGE's suggestions add greater specificity to the definition.

**Section (1):**

**(1) As used in this rule, "billing error" means a calculation error made by an energy utility in the calculation of tariffed amounts billed to utility customers that:**

- (a) Is due to a single, specific event, reason, or condition, and**
- (b) Resulted in the issuance of a corrected energy bill**

At the October 4<sup>th</sup> Public Meeting, ALJ Power raised concerns with the then-drafted rule containing reporting triggers that would result in utilities never having to report. To address his concern, the proposed threshold has been lowered. PGE supports the lower reporting threshold in section 2, and proposes the following additional clarifying language.

**Section (2):**

**(2) Each energy utility must send an electronic mail message to the Consumer Services Section of the Commission within 10 business days of the date the energy utility first becomes aware of a billing error that the utility estimates affected 0.5 percent or more of customer bills in a billing month by an average of \$5.00 or more.**

In section 3, PGE supports greater specificity in the reporting requirement that removes ambiguity, with a slight modification.

**Section (3):**

**(3) Each energy utility must send by electronic mail message to the Consumer Services Section of the Commission a final report of the billing errors noticed under section (2) of this rule no later than 60 calendar days from the date of the initial notice. This report must include the following information:**

- a) A description and cause, if known, of the billing error;
- b) The number of bills affected by the billing error;
- c) The number of bills adjusted due to the billing error;
- d) The time period in which the billing error affected customer bills;
- e) The actions taken to correct the billing error, and
- f) The actions taken to prevent the same error from occurring in the future.

PGE supports the annual reporting requirement in section 4 and its being limited to those billing errors that are systemic in nature as defined in section 2 and reported under section 3. There would be little value in a utility having to report on all bill errors; the focus on potentially systemic issues is more efficient for both utility and Commission staff.

**Section (4)**

**(4) Each energy utility must file an annual report to the Commission, through the filing center, summarizing all billing errors reported under section (3) above that occurred during the prior calendar year. The annual report must be submitted within 60 calendar days following the end of the calendar year.**

**Conclusion:**


PGE appreciates the work and collaborative approach by Staff to develop this proposed rule. The rule with these suggested changes, strikes the right balance between safeguarding billing accuracy for utility customers and administrative burdens placed on the Commission and utility companies.

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Thank you for the opportunity to comment on the proposed rule update.

Sincerely,

A handwritten signature in black ink that reads "Teri Bowman". The signature is fluid and cursive, with a large loop at the beginning and end.

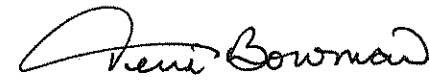
 Karla Wenzel  
Manager, Tariff Analysis and Administration

Cc AR 567 Service List

**CERTIFICATE OF SERVICE**

I hereby certify that I have this day caused **PORTLAND GENERAL ELECTRIC COMPANY'S COMMENTS ON STAFF'S FINAL PROPOSED RULES** to be served by electronic mail to those parties whose email addresses appear on the attached service list for OPUC Docket No. AR 567.

DATED at Portland, Oregon, this 20<sup>th</sup> day of November, 2012.



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