



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

October 3, 2012

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

Attn: Filing Center

RE: **AR 567 Billing Error Reporting – PGE Comments on
Proposed Rule 860-021-0170**

PGE appreciates the opportunity to comment on the proposed rule that will replace PGE's B1 SQM (UM 1206) that expired in September 2012 with similar reporting conditions and requirements. Our comments are intended to clarify the intent of this reporting rule referenced in the above docket and presented as rule 860-021-0170, Billing Error Reporting.

Section (1) (a):

The definition of "Billing Error" as proposed in the rule is reasonable; therefore, PGE agrees with the proposed language:

- (1) As used in this rule, "Billing error" means an error in the calculation of amounts billed to energy utility customers that:
- (a) Is due to a single, specific event, reason, or condition, and
 - (b) Resulted in the issuance of a corrected bill.

Section (2) (a) and (b):

In its September 12, 2012 submitted comments, NW Natural's assessment of this section is correct. As currently written, the language suggests a utility would be required to notify the Consumer Services Section of the Commission should either condition in (a) or (b) occur. PGE understands that the intent is that both conditions must exist for a billing error to be reportable. We believe that instead of requiring a report for each error affecting a single customer by \$25.00 or more, it would be less burdensome on all parties involved and provide the Commission with reports for significant billing errors if this language were modified consistent with the changes submitted by NW Natural:

(2) Each energy utility must send an electronic mail message notifying the Consumer Services Section of the Commission within 10 business days of the date the energy utility first becomes aware of:

- (a) A single billing error that the utility estimates may affect affected 1.5 percent or more of its customer bills issued in any billing month by an average of \$25.00 or more, and
- (b) ~~Any error, in a single billing month, affecting a single customer by \$25.00 or more.~~

Section (3):

In this section, the distinction of when to report a bill error is unclear, thus PGE supports the change by NW Natural that removes ambiguity and adds language clarifying the timing of such reporting.

(3) An energy utility must submit a final written report of the billing error as described under section (2) above to the Consumer Services Section of the Commission no later than 60 calendar days from the date of the initial notice. ~~that the billing error was first reported to the Commission or was first discovered by the energy utility, whichever date is earlier.~~ 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 error; and
- (f) The actions taken to prevent the same error from occurring in the future.

Section (4)

PGE supports the clarification made by NW Natural to this section with the added reference to section (3):

(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.

New - Section (5)

PGE believes that preserving a force majeure clause is necessary in the event that extenuating circumstances delays the reporting of a billing error to the Consumer Services Section of the Commission. PGE therefore suggests the following section be added that would allow the Company to seek Commission approval for such delay when circumstances call for it:

(5) The time period for reporting may be extended by the Commission if a major event or other extenuating circumstances beyond the utility's control is anticipated to delay the reporting of a Billing Error to the Consumer Services Section of the Commission as required in sections (2), (3) and (4) of this rule.

Attached are PGE's proposed revisions to the draft rule, which includes a redline of rule changes.

PGE appreciates the work that Staff has put into developing this proposed rule and believes that this rule, with these suggested changes, provides the right balance between safeguarding billing accuracy for utility customers and administrative burden placed on the OPUC and utility companies. PGE looks forward to further participation in this rulemaking as it progresses.

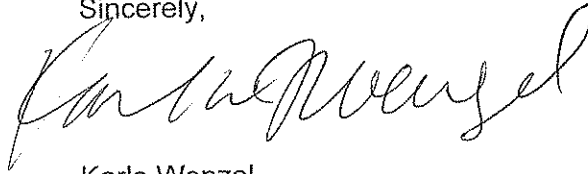
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Please direct any questions regarding this filing to Terri Bowman at (503) 464-8854.

Please direct all formal correspondence and requests to the following email address
pge.opuc.filings@pgn.com

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

Sincerely,

A handwritten signature in black ink, appearing to read "Karla Wenzel". The signature is written in a cursive, flowing style.

Karla Wenzel
Manager, Tariff Analysis and Administration

Attachment

cc: Phil Boyle
Lisa Gorsuch

860-021-0170

Billing Error Reporting

(1) As used in this rule, "billing error" means an error in the calculation of amounts billed to customers of energy utilities that:

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

(2) Each energy utility must send an electronic mail message notifying the Consumer Services Section of the Commission within 10 business days of the date the energy utility first becomes aware of:

- (a) A single billing error that the utility estimates may affect affected 1.5 percent or more of its customer bills issued in any billing month by an average of \$25.00 or more. and
- (b) ~~Any error, in a single billing month, affecting a single customer by \$25.00 or more.~~

(3) An energy utility must submit a final written report of ~~the any billing error noticed under section (2) above~~ to the Consumer Services Section of the Commission no later than 60 calendar days from the date of the initial notice. ~~That the billing error was first reported to the Commission or was first discovered by the energy utility, whichever date is earlier.~~

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 error; and
- (f) The actions taken to prevent the same error from occurring in the future.

(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.

(5) The time period for reporting may be extended by the Commission if a major event or other extenuating circumstances beyond the utility's control is anticipated to delay the reporting of a Billing Error to the Consumer Services Division of the Commission as required in section (2), (3) and (4) of this rule.

Statutory Authority: ORS Ch. 183, 756 & 757

Statutes Implemented: ORS 756.040 & 757.020.

History: NEW

CERTIFICATE OF SERVICE

I hereby certify that I have this day caused **PORTLAND GENERAL ELECTRIC COMPANY'S COMMENTS ON PROPOSED RULE 860-021-0170** to be served by electronic mail to those parties whose email addresses appear below on the service list for OPUC Docket No. AR 567.

DATED at Portland, Oregon, this 3rd day of October, 2012.



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