BEFORE THE PUBLIC UTILITY COMMISSION

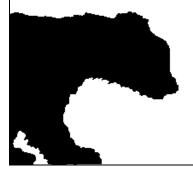
OF OREGON

AR 584

In the Matter of	
Rulemaking to Amend Rules Regarding Adjustment of Utility Bills	

COMMENTS OF

THE CITIZENS' UTILITY BOARD OF OREGON



October 22, 2014

BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

AR 584

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In the Matter of Rulemaking to Amend Rules Regarding Adjustment of Utility Bills COMMENTS OF THE CITIZENS' UTILITY BOARD OF OREGON

The Citizens' Utility Board of Oregon ("CUB") appreciates the opportunity to comment in support of the proposed changes to OARs 860-021-0135(2)(a), 860-036-0135(1)(a) and 860-037-0120(1)(a). Staff proposes to replace the word "must" with "may" in each of the administrative rules in order to ensure that utilities retain flexibility in circumstances when a former customer has been under-billed. CUB believes that these changes will allow the utilities the appropriate flexibility when addressing under-billed amounts for former customers and believes that these changes are consistent with the language and concepts agreed to by CUB in docket AR 579, the docket that established rules for billing adjustments for former customers. CUB has no further comments at this time.

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Respectfully submitted,

Smmufenyut

Sommer Templet, OSB #105260 Staff Attorney Citizens' Utility Board of Oregon 610 SW Broadway, Ste. 400 Portland, OR 97205 (503) 227-1984 phone (503) 224-2596 fax sommer@oregoncub.org

AR 584– CERTIFICATE OF SERVICE

I hereby certify that, on this 22nd day of October, 2014, I served the foregoing **COMMENTS OF THE CITIZENS' UTILITY BOARD OF OREGON** in docket AR 584 upon each party listed in the AR 584 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 one original and five copies by U.S. mail, postage prepaid, to the Commission's Salem offices.

(W denotes waiver of p	oaper service)	(C denotes se material autl	ervice of Confidential horized)
w	R. BRYCE I DIRECTOR REGULATO AND REVE	DALLEY , RY AFFAIRS	825 NE MULTNOMAH ST., STE 2000 PORTLAND OR 97232 bryce.dalley@pacificorp.com
W	PACIFICO PACIFIC F OREGON D	POWER	825 NE MULTNOMAH ST, STE 2000 PORTLAND OR 97232 oregondockets@pacificorp.com
			Respectfully submitted, Sommer Templet, OSB #105260 Staff Attorney Citizens' Utility Board of Oregon 610 SW Broadway, Ste. 400 Portland, OR 97205 (503) 227-1984 phone

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