

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

In the Matter of)
) COMMENTS OF THE CITIZENS'
) UTILITY BOARD OF OREGON
Rulemaking to Amend Rules Regarding)
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_____)

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,

A handwritten signature in black ink, appearing to read "Sommer Templet". The signature is fluid and cursive, with the first name being more prominent.

Sommer Templet, OSB #105260
Staff Attorney

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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 paper service) (C denotes service of Confidential material authorized)

W	PACIFIC POWER R. BRYCE DALLEY DIRECTOR, REGULATORY AFFAIRS AND REVENUE	825 NE MULTNOMAH ST., STE 2000 PORTLAND OR 97232 bryce.dalley@pacificcorp.com
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Respectfully submitted,



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