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Attorney for Respondent BendTel Inc.

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

SA 301

In the Matter of BENDTEL INC
(ID #7909)
Assessment of RSPF Late
Fees/Penalties/Interest

**REQUEST FOR HEARING
(Filed by BendTel Inc.)**

COMES NOW BendTel Inc. by and through its undersigned attorneys, and hereby requests a hearing in the above-captioned matter.

BendTel requests a hearing on the following grounds:

1. The proposed assessment is subject to an accord and satisfaction whereby the Commission proposed certain terms for repayment which Respondent agreed to and followed;
2. The late payments assessed by the Commission are inaccurate, and do not reflect the dates upon which the purportedly late payments were received;
3. The Commission is estopped from the late payment penalties and interest by having accepted a schedule for repayment, having accepted the scheduled payments from Respondent with interest, and by waiting over three years for providing notice to Respondent of any demand for penalties or additional interest;
4. The proposed assessment is untimely and therefore barred;
5. The proposed assessment is unreasonable under the circumstances.

Wherefore, Respondent requests a determination denying the proposed assessment and for such other relief as Respondent may be entitled to.

DATED AND FILED this 10th day of February, 2017.

Francis Hansen & Martin LLP

/s/ Michael H. McGean

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