



Portland General Electric
121 SW Salmon Street • Portland, OR 97204
portlandgeneral.com

December 17, 2021

Public Utility Commission of Oregon
Attn: Filing Center
201 High Street, S.E.
P.O. Box 1088
Salem, OR 97308-1088

RE: UE 394 – In the Matter of Portland General Electric Company, Request for a General Rate Revision

Dear Filing Center:

Enclosed for filing in the above-referenced docket is Portland General Electric Company's (PGE) Errata to PGE's Reply Testimony filed on December 2, 2021.

Upon further review, PGE has identified one error to be corrected.

1. Referring to PGE/2200, Macfarlane-Tang/25, lines 6-12 PGE inadvertently paraphrased what Staff stated in opening testimony UE 394 Staff Exhibit 400/39, line 3-4, on how Fee Free Bank Card program costs be allocated.

If you have any questions, please feel free to contact me at (503) 464-7488. Please direct all formal correspondence and requests to the following e-mail address:
pge.opuc.filings@pge.com.

Sincerely,

/s/ Jaki Ferchland

Jaki Ferchland
Manager, Revenue Requirement

1 The program costs are weighted toward customer classes enrolled in paperless billing as
2 they are more likely to use FFBC program. Residential and small nonresidential customers
3 are appropriately allocated most of the costs with approximately 93% of the costs being
4 allocated to Schedule 7 customers and approximately 6% being allocated to Schedule 32
5 customers.

6 **Q. What is Staff’s position on allocating Fee Free Bank Card costs?**

7 A. Staff recommends that PGE change the method of allocating the costs of the FFBC program.
8 Instead of allocating costs across all customer classes based on the percentage of customers
9 enrolled in paperless billing, the fee free charge program should be spread across all customer
10 classes based on an equal percent of revenue basis~~PGE should allocate costs to each customer~~
11 ~~class based on the percentage of FFBC costs incurred by that customer class.~~ Staff believes
12 the current method of allocation is not equitable and results in residential customers bearing
13 more costs than non-residential customers.

14 **Q. What is CUB’s position?**

15 A. CUB recommends that bill payments cost allocation be separated between residential and
16 non-residential customers, and that allocating transaction costs to the customer class that
17 drives those costs, will avoid cross-subsidization. “CUB recommends directing allocating
18 FERC account 454 in a two-step approach. First, costs should be directly allocated between
19 residential and non-residential customers. Second, within the nonresidential group, non-
20 residential customers costs under account 454 should be allocated based on number of
21 paperless bill customers.”