

**PUBLIC UTILITY COMMISSION
OF
OREGON**

STAFF EXHIBIT 2302

REDACTED
Confidential Exhibits in Support of
Opening Testimony

Protected Information Subject to
General Protective Order No. 21-206

ERRATA
January 13, 2022

REDACTED

**"PGE Response to OPUC DR 941
Attachment A"**

is filed in electronic format

**This Exhibit is Confidential and
Subject to Modified General Protective
Order No. 21-206**

CONFIDENTIAL

Protected Information Subject to General Protective Order No. 21-206
December 13, 2021

Staff/2302
Scala/2

To: Michelle Scala
Public Utility Commission of Oregon

From: Jaki Ferchland
Manager, Revenue Requirement

Po1iland General Electric Company
UE394
PGE Response to OPUC Confidential Data Request 949
Dated December 6, 2021

Request:

RefeITing to PGE/1700, Bekkedahl-MacFarland [sic] /11, lines 1-3, a) please identify all FFBC providers that PGE contacted to expand the program to non-residential customers. b) Please provide copies of any communications to the providers, or othelwise document, that eve1y one of these providers preclude PGE from, "charge band [sic] card fees to one set of non-residential customers and have no fees for another set of non-residential customers." c) Please provide any colTespondence to FFBC providers that demonstrate PGE tried to be pennitted the flexibility to limit FFBC to celiaian classes of customers.

Response:

PGE's contract with Pa,mentus includes the followin_g clause: [BEGIN CONFIDENTIAL]

[REDACTED] [END CONFIDENTIAL]. As a result of this exclusion, PGE did not reach out to other providers for payment selvices. Although PGE reached out to Paymentus to discuss different payment options for commercial customers, as noted in PGE Exhibit 1700, page 9, "Card issuer rnles specify that PGE cannot offer different payment options to business customers based on their basic selvice rate schedule." Therefore, the restriction comes from VISA, not the payment processor provider.

CONFIDENTIAL

Protected Information Subject to General Protective Order No. 21-206
December 16, 2021

Staff/2302

Scala/3

To: Michelle Scala
Public Utility Commission of Oregon

From: Jaki Ferchland
Manager, Revenue Requirement

Portland General Electric Company
UE 394
PGE Response to OPUC Data Request 942
Dated December 6, 2021

Request:

Referring to PGE Exhibit 1700 at page 14, lines 19-21, please provide associated work papers evidencing the calculations for the average cost per transactions.

Response:

PGE used the average of Amazon Pay residential transactions from July 1, 2021, to July 20, 2021, of \$76 dollars and multiplied it by the Amazon Pay fee of [BEGIN CONFIDENTIAL] [REDACTED] [END CONFIDENTIAL] resulting in average fee of [BEGIN CONFIDENTIAL] [REDACTED] [END CONFIDENTIAL].

Upon further research, PGE found that although the payments made via Amazon Pay were fairly small at the beginning, the average residential bill has grown since. As a result, PGE used the average residential bill of \$102.17¹, resulting in the correct average transaction fee of [BEGIN CONFIDENTIAL] [REDACTED] [END CONFIDENTIAL] more than the average cost for other digital payment types.

If the fee structure was the same for Amazon Pay as it is for other digital wallets, the estimated 2021 difference between fee structures would be \$852.13 for 2021. Please see Highly Confidential Attachment 942-A for additional information.

Attachment 942-A contains highly confidential information and is subject to Modified Protective Order 21-237.

¹ <https://portlandgeneral.com/about/info/quick-facts>

REDACTED

**"PGE 2022 TY – Customer Marginal
Cost – Work Papers Updated
11.20.21_CONF"**

is filed in electronic format

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Subject to Modified General Protective
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