

CASE: UE 394  
WITNESS: MICHELLE SCALA

**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

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

**Request:**

Referring 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 otherwise document, that every 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 correspondence to FFBC providers that demonstrate PGE tried to be permitted the flexibility to limit FFBC to certain classes of customers.

**Response:**

PGE's contract with Paymentus includes the following clause: [BEGIN CONFIDENTIAL]

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

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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 \$102.17<sup>1</sup>, 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.

<sup>1</sup> <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**

**This Exhibit is Confidential and  
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Order No. 21-206**