

**BEFORE THE PUBLIC UTILITY COMMISSION
OF THE STATE OF OREGON**

In the Matter of)
)
PORTLAND GENERAL ELECTRIC) **Docket No. UE 394**
COMPANY)
)
Request for a General Rate Revision.)

**OPENING TESTIMONY OF
JUSTIN BIEBER
ON BEHALF OF
FRED MEYER STORES**

OCTOBER 25, 2021

1 **OPENING TESTIMONY OF JUSTIN BIEBER**

2

3 **Introduction**

4 **Q. Please state your name and business address.**

5 A. My name is Justin Bieber. My business address is 111 E Broadway, Suite
6 1200, Salt Lake City, Utah 84111.

7 **Q. By whom are you employed and in what capacity?**

8 A. I am a Senior Consultant at Energy Strategies, LLC. Energy Strategies is a
9 private consulting firm specializing in economic and policy analysis applicable to
10 energy production, transportation, and consumption.

11 **Q. On whose behalf are you testifying in this proceeding?**

12 A. My testimony is being sponsored by Fred Meyer Stores and Quality Food
13 Centers (“Fred Meyer”), divisions of The Kroger Co. Kroger receives most of its
14 service from Portland General Electric (“PGE”) under rate Schedule 485.

15 **Q. Please describe your professional experience and qualifications.**

16 A. My academic background is in business and engineering. I earned a
17 Bachelor of Science in Mechanical Engineering from Duke University in 2006 and
18 a Master of Business Administration from the University of Southern California in
19 2012. I am also a registered Professional Civil Engineer in the state of California.

20 I joined Energy Strategies in 2017, where I provide regulatory and technical
21 support on a variety of energy issues, including regulatory services, transmission
22 and renewable development, and financial and economic analyses. I have also filed

1 and supported the development of testimony before various state utility regulatory
2 commissions.

3 Prior to joining Energy Strategies, I held positions at Pacific Gas and
4 Electric Company as Manager of Transmission Project Development, ISO
5 Relations and FERC Policy Principal, and Supervisor of Electric Generator
6 Interconnections. During my career at Pacific Gas and Electric Company, I
7 supported multiple facets of utility operations, and led efforts in policy, regulatory,
8 and strategic initiatives, including supporting the development of testimony before
9 and submittal of comments to the FERC, California ISO, and the California Public
10 Utility Commission. Prior to my work at Pacific Gas & Electric, I was a project
11 manager and engineer for heavy construction bridge and highway projects.

12 **Q. Have you testified previously before this Commission?**

13 **A.** Yes, I have testified in PGE's 2018 general rate case, UE 335. I also
14 testified in PacifiCorp's 2020 general rate case, UE 374.

15 **Q. Have you filed testimony previously before any other state utility regulatory**
16 **commissions?**

17 **A.** Yes. I have testified before state utility commissions in Colorado, Indiana,
18 Kentucky, Michigan, Montana, Nevada, New Mexico, North Carolina, Ohio, Utah,
19 Virginia, and Wisconsin.

20

1 **Overview and Conclusions**

2 **Q. What is the purpose of your opening testimony in this proceeding?**

3 A. My testimony addresses PGE's proposed Customer Impact Offset (CIO).

4 **Q. What are your primary conclusions and recommendations?**

5 A. The Commission should reject the CIO as proposed by PGE. PGE's
6 proposed CIO has a disproportionate impact on Direct Access Schedule 485
7 customers and would result in an effective rate increase of 15.6% for Schedule 485,
8 more than three times the system average. This is not a reasonable result, especially
9 given that absent the CIO, PGE's own Marginal Cost of Service Study indicates
10 that Schedule 85 should receive a rate *decrease*. I recommend modifications to the
11 CIO and system usage charge rate design for Schedules 85/485 that will help
12 mitigate these disproportionate impacts to Schedule 485 customers.

13

14 **Customer Impact Offset (CIO)**

15 **Q. How does PGE allocate costs among the different rate schedules?**

16 A. PGE rate design witnesses Robert Macfarlane and Teresa Tang explain that
17 PGE uses the Marginal Cost of Service Study to inform the allocation of functional
18 revenue requirements in the rate-spread process.¹

¹ PGE/1200, Macfarlane - Tang, p.7.

1 **Q. Does PGE propose to mitigate the rate impact to certain rate schedules that**
2 **would otherwise result from a complete alignment between rate-spread and**
3 **the Marginal Cost of Service Study?**

4 A. Yes. Mr. Macfarlane and Ms. Tang explain that the Company proposes to
5 utilize the CIO to limit the rate increase to certain rate schedules. The proposed
6 CIO would limit the rate increase to Schedule 7 and 32 customers while increasing
7 costs relative to the cost of service for Schedules 85/485/585/89/489/589.
8 According to Mr. Macfarlane and Ms. Tang, after the CIO, Schedule 32 is limited
9 to twice the proposed overall increase and Schedules 85 and 89 will not receive an
10 increase or a decrease. PGE proposes to implement the CIO by decreasing the
11 distribution charges for Schedules 7 and 32 and increasing the system usage charges
12 for Schedules 85/485/585/89/489/589.²

13 **Q. PGE claims that the proposed CIO does not result in an increase for Schedules**
14 **85 and 89.³ After PGE’s proposed CIO is applied, what would be the impact**
15 **to Direct Access customers on Schedules 485?**

16 A. After the proposed CIO and excluding changes to Schedule 129 Long-Term
17 Transition Cost Adjustment revenues, Direct Access customers on Schedule 485
18 would receive an increase of 15.6%, which is more than three times the system
19 average. The detailed rate impacts by class, excluding the Public Purpose Charge
20 (“PPA”), Low Income Assistance (“LIA”), and Schedule 129 revenues are
21 presented in Exhibit FM/101 and summarized in Table JB-1 below.

² *Id.* pp. 34-35.

³ *Id.* p. 35.

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**Table JB-1
PGE Proposed Rate Impacts by Rate Schedule
Excluding PPC, LIA, and Schedule 129 Revenues**

<u>Rate</u>	<u>Schedule</u>	<u>% Change</u>
Residential	7	6.5%
General Service	32/38	7.7%
Irrig. & Drain. Pump.	47/49	7.2%
General Service 31-200 kW	83	4.4%
General Service 201-4,000 kW	85	0.0%
Schedule 89 > 4 MW	89	0.0%
Schedule 90	90	-3.2%
Lighting	15/91/92/95	12.7%
Direct Access Service 201-4,000 kW	485	15.6%
Direct Access Service > 4 MW	489	1.7%
New Load Direct Access Service	689	-8.4%
	TOTAL	4.6%

Q. Please explain why you have excluded Schedule 129 revenues from PGE’s proposed rate impacts.

A. Long-term Direct Access customers are subject to transition cost adjustment charges under Schedule 129 for a transition period after becoming a Direct Access customer. Based on PGE’s filed case, there would be a reduction of \$5.7 million in Schedule 129 revenues from schedule 485 customers. However, the large majority of this reduction, \$4.2 million, is due to the fact that 2017 Vintage Schedule 485 customers will no longer be subject to transition charges. Thus the decrease in Schedule 129 revenues for these customers is completely unrelated to PGE’s general rate case and would occur regardless of what PGE proposes in this instant proceeding. Further, the majority of Schedule 485 customers are no longer subject to transition cost adjustment charges and will not experience any decrease

1 in revenues resulting from changes to Schedule 129 rates. Table JB-2 below
2 summarizes the reduction in Schedule 129 revenues from customers on Schedule
3 485.

4 **Table JB-2**
5 **PGE Proposed Change in Schedule 129 Revenues**
6 **From Customers on Schedule 485**

	Sch 129 Price (¢/kWh)		Sch 129
	<u>Current</u>	<u>Proposed</u>	<u>Rev Delta</u>
Schedule 485-S V2017	2.85	0.00	(\$2,362,750)
Schedule 485-S V2018	3.07	2.25	(\$445,554)
Schedule 485-S V2019	2.97	2.15	(\$249,447)
Schedule 485-S V2020	2.38	1.55	(\$82,984)
Schedule 485-P V2017	2.80	0.00	(\$1,862,523)
Schedule 485-P V2018	3.03	2.24	(\$110,092)
Schedule 485-P V2019	2.96	2.17	(\$190,168)
Schedule 485-P V2020	2.36	1.57	(\$184,079)
Schedule 485-P V2021	3.14	2.35	(\$225,372)
Total Decrease in Sch 129 Revenue			(\$5,712,969)
Decrease Resulting from End of Opt-Out Period			(\$4,225,273)

7
8 **Q. Do you have concerns with PGE's proposed CIO for Schedule 85/485**
9 **customers?**

10 A. Yes, I do. The proposed CIO for Schedule 85/485 customers has a
11 disproportionate impact on Direct Access customers. PGE proposes to levy a CIO
12 on Schedules 85 and 89 so that those schedules do not receive a rate *decrease*.
13 However, the proposed CIO would result in Schedule 485 customers receiving a
14 15.6% *increase*, more than three times the system average. At the same time, the
15 rate schedules that would *receive* the subsidy being paid by Schedule 485 customers

1 would get a rate increase that is *less than half* the rate increase of Schedule 485.
2 This is not a reasonable result, especially given that absent the CIO, PGE's own
3 Marginal Cost of Service Study indicates that Schedule 85 should receive a rate
4 *decrease*.

5 **Q. What do you recommend to mitigate this unreasonable rate impact to**
6 **Schedule 485 customers?**

7 A. I recommend that the Schedule 85/485 system usage charge rate design
8 should be modified to include a percent of bill component to recover the proposed
9 CIO. PGE's proposed system usage charge for Schedule 85/485 would include a
10 CIO component of 1.64 mills/kWh. I recommend that this energy-based CIO rate
11 component be eliminated and replaced with a new system usage charge component
12 equal to 1.925% of a Schedule 85/485 customer's bill. Note that I am only
13 recommending a change to the portion of the system usage charge that would
14 recover the CIO. I am not recommending any changes to the energy-based system
15 usage charge rate component that is designed to recover Franchise Fees and Other
16 costs.

17 I also recommend that the CIO allocation to Schedules 85/485/585 be
18 reduced from \$6.0 million to \$4.7 million in order to maintain a near zero class rate
19 impact for Schedule 85. This can be accomplished with a corresponding revenue
20 neutral offset to the Schedule 7 CIO, resulting in a Schedule 7 CIO credit of 0.48
21 mills/kWh. The revenue verification for my proposed modifications to the CIO is
22 presented in Exhibit FM/102.

1 **Q. Have you calculated the rate impacts to the different rate schedules that would**
2 **result from your recommended changes to the CIO?**

3 A. Yes, the rate impacts resulting from my recommended changes to the CIO
4 compared to PGE's proposed rate impacts are presented in Exhibit FM/103 and
5 summarized in Table JB-3 below.

6 **Table JB-3**
7 **Rate Impacts by Rate Schedule**
8 **at Kroger Recommended CIO Compared to PGE Proposed Rate Impacts**
9 **at PGE Proposed Revenue Requirement**
10 **Excluding PPC, LIA, and Schedule 129 Revenues**

<u>Rate</u>	<u>Schedule</u>	<u>PGE % Change</u>	<u>Kroger % Change</u>	<u>Difference</u>
Residential	7	6.5%	6.6%	0.1%
General Service	32/38	7.7%	7.7%	0.0%
Irrig. & Drain. Pump.	47/49	7.2%	7.2%	0.0%
General Service 31-200 kW	83	4.4%	4.4%	0.0%
General Service 201-4,000 kW	85	0.0%	-0.1%	-0.1%
Schedule 89 > 4 MW	89	0.0%	0.0%	0.0%
Schedule 90	90	-3.2%	-3.2%	0.0%
Lighting	15/91/92/95	12.7%	12.7%	0.0%
Direct Access Service 201-4,000 kW	485	15.6%	6.5%	-9.1%
Direct Access Service > 4 MW	489	1.7%	1.7%	0.0%
New Load Direct Access Service	689	-8.4%	-8.4%	0.0%
	TOTAL	4.6%	4.6%	0.0%

11
12 As can be seen in Table JB-3, my recommended modifications would result
13 in a 6.5% increase to Schedule 485 while at the same time having only a 0.1%
14 impact to Schedules 7 and 85 relative to PGE's proposed rate-spread. My
15 recommended modifications would not have any impact on the other rate schedules.

1 **Q. Your recommended modifications result in a 0.1% increase to Schedule 7**
2 **relative to PGE's proposed rate-spread. Can you please explain why you are**
3 **recommending a modification to the CIO that impacts Schedule 7?**

4 A. Under PGE's proposed CIO and rate-spread, Schedule 7 is the beneficiary
5 of subsidy payments from Schedules 85/485. One of PGE's stated objectives for
6 the CIO is to increase costs for Schedule 85 relative to the cost of service so that
7 Schedule 85 does not receive a rate increase or decrease. In order to be consistent
8 with this objective, my recommended change to the CIO rate design for Schedules
9 85/485 requires an adjustment to the amount of the CIO, resulting in a 0.1% impact
10 to Schedule 7, relative to PGE's proposed rate-spread.

11 Given that my recommended modifications to the CIO would still provide
12 \$3.6 million in CIO subsidy credits to Schedule 7, while also accomplishing PGE's
13 objective that Schedule 85 does not receive a rate increase or a decrease, I believe
14 that my recommended modifications to the CIO achieve a reasonable result.
15 However, to the extent that the Commission determines that it is appropriate for
16 Schedule 7 to receive additional CIO revenues, then those additional subsidy credits
17 can be funded by increasing my recommended percent of bill system usage charge
18 component for Schedules 85/485. Increasing my recommended CIO charge from
19 1.925% to 2.452% of a Schedule 85/485 customer's bill would provide the
20 necessary amount of CIO funding to maintain PGE's proposed \$4.7 million of CIO
21 subsidy credits to Schedule 7.

1 **Q. Have you prepared a bill impact analysis for your recommended changes to**
2 **the system usage charge rate design for Schedule 85?**

3 A. Yes. My rate impact analysis is presented in Exhibit FM/104 and
4 illustrates the bill impacts to Schedule 85 customers that would result from my
5 recommended modifications to the CIO. As can be seen in Exhibit FM/104, the
6 bill impacts from my recommended modifications do not vary substantially
7 relative to the bill impacts for the various Schedule 85 load profiles proposed by
8 PGE.

9 **Q. Your proposed modifications to the CIO were calculated at PGE's proposed**
10 **revenue requirement. How should your proposed modifications be adjusted if**
11 **the Commission adopts a base rate revenue requirement that is different than**
12 **PGE's request?**

13 A. I do not recommend any adjustments to my recommended CIO if the
14 Commission approves a revenue requirement that is less than PGE's request. To
15 the extent that the Commission approves a revenue requirement that is lower than
16 PGE's request, that will result in smaller rate impacts for all rate schedules. The
17 CIO would already provide a reasonable rate mitigation to Schedules 7 and 32 at
18 PGE's proposed revenue requirement. It would not be necessary to further increase
19 the inter-class subsidies provided through the CIO at a lower revenue requirement.

20 **Q. Does this conclude your opening testimony?**

21 A. Yes, it does.

BEFORE THE PUBLIC UTILITY COMMISSION
OF THE STATE OF OREGON

UE 394

In the Matter of)
PORTLAND GENERAL ELECTRIC)
COMPANY)
Request for a General Rate Revision.)

AFFIDAVIT OF JUSTIN BIEBER

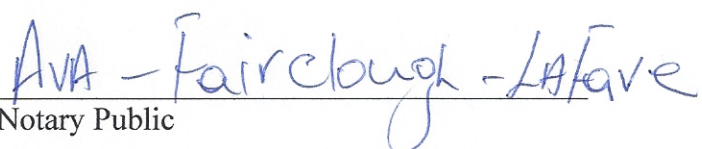
STATE OF UTAH)
)
COUNTY OF SALT LAKE)

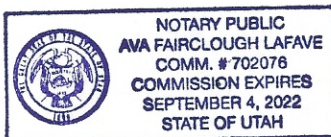
Justin Bieber, being first duly sworn, deposes and states that:

1. He is a Senior Consultant with Energy Strategies. L.L.C., in Salt Lake City, Utah;
2. He is the witness who sponsors the accompanying testimony entitled "Opening Testimony of Justin Bieber;"
3. Said testimony was prepared by him and under his direction and supervision;
4. If inquiries were made as to the facts and schedules in said testimony he would respond as therein set forth; and
5. The aforesaid testimony and schedules are true and correct to the best of his knowledge, information and belief.


Justin Bieber

Subscribed and sworn to or affirmed before me this 25th day of October, 2021, by Justin Bieber.


Notary Public



**BEFORE THE PUBLIC UTILITY COMMISSION
OF THE STATE OF OREGON**

In the Matter of)	
)	
PORTLAND GENERAL ELECTRIC)	Docket No. UE 394
COMPANY)	
)	
Request for a General Rate Revision.)	

EXHIBITS

**Portland General Electric Proposed Rate Impacts by Rate Schedule
Excluding Public Purpose Charge, Low Income Assistance, and Schedule 129 Revenues**

CATEGORY	RATE SCHEDULE	CUSTOMERS	MWH SALES	TOTAL ELECTRIC BILLS		Change	
				CURRENT	PROPOSED	AMOUNT	PCT.
				supplementals except LIA, PPC & Sch 129	supplementals except LIA, PPC & Sch 129		
Residential	7	809,036	7,555,010	\$1,017,035,870	\$1,082,623,855	\$65,587,984	6.4%
Employee Discount				(\$1,110,239)	(\$1,163,909)	(\$53,670)	
Subtotal				\$1,015,925,631	\$1,081,459,946	\$65,534,314	6.5%
Outdoor Area Lighting	15	0	14,480	\$3,338,214	\$3,601,934	\$263,721	7.9%
General Service <30 kW	32	94,649	1,576,157	\$202,510,144	\$218,402,509	\$15,892,365	7.8%
Opt. Time-of-Day G.S. >30 kW	38	377	31,528	\$4,511,855	\$4,508,372	(\$3,483)	-0.1%
Irrig. & Drain. Pump. < 30 kW	47	2,775	20,075	\$4,207,083	\$4,434,768	\$227,685	5.4%
Irrig. & Drain. Pump. > 30 kW	49	1,405	61,430	\$9,314,705	\$10,063,139	\$748,434	8.0%
General Service 31-200 kW	83	11,844	2,800,127	\$286,246,767	\$298,930,061	\$12,683,294	4.4%
General Service 201-4,000 kW							
Secondary	85-S	1,304	2,134,357	\$188,800,488	\$188,854,043	\$53,555	0.0%
Primary	85-P	177	612,588	\$50,821,399	\$50,885,400	\$64,002	0.1%
Secondary	89-S	0	0	\$0	\$0	\$0	
Primary	89-P	12	562,911	\$38,860,057	\$38,766,023	(\$94,034)	-0.2%
Subtransmission	89-T/75-T	5	53,697	\$4,426,999	\$4,528,377	\$101,378	2.3%
Schedule 90	90-P	6	2,824,250	\$179,775,368	\$173,986,897	(\$5,788,471)	-3.2%
Street & Highway Lighting	91/95	184	41,836	\$9,743,529	\$11,194,969	\$1,451,440	14.9%
Traffic Signals	92	16	2,576	\$236,573	\$207,389	(\$29,184)	-12.3%
COS TOTALS		921,790	18,291,022	\$1,998,718,812	\$2,089,823,827	\$91,105,015	4.6%
Direct Access Service 201-4,000 kW							
Secondary	485-S	230	518,480	\$8,829,590	\$10,097,105	\$1,267,515	14.4%
Primary	485-P	57	373,475	\$4,107,920	\$4,857,851	\$749,930	18.3%
Direct Access Service > 4 MW							
Secondary	489-S	1	13,878	\$279,362	\$265,885	(\$13,477)	-4.8%
Primary	489-P	14	1,007,674	\$7,070,747	\$7,186,068	\$115,321	1.6%
Subtransmission	489-T	3	243,839	\$1,428,178	\$1,479,373	\$51,196	3.6%
New Load Direct Access Service > 10MW							
Primary	689-P	1	48,674	\$640,811	\$586,835	(\$53,976)	-8.4%
DIRECT ACCESS TOTALS		306	2,206,020	22,356,608	24,473,116	\$2,116,509	9.5%
COS AND DA CYCLE TOTALS		922,096	20,497,042	\$2,021,075,419	\$2,114,296,943	\$93,221,523	4.6%

Revenue Verification for Kroger Proposed Modifications to the Customer Impact Offset
 Proposed 2022 Prices at PGE Revenue Requirement

Grouping	Sch 105 Price	Sch 109 Price	Sch 110 Price	Sch 112 Price	Sch 123 Price	Sch 126 Price	Sch 135 Price	Sch 136 Price	Sch 137 Price	Energy Storage Sch 138 Price	TE Sch 150 Price
Schedule 7	(0.29)	3.83	0.08	0.30	(2.16)		1.25	0.12	0.16	0.04	0.16
Schedule 15 Residential	(0.48)	6.60	0.16	0.25	0.21		0.95	0.20	0.27	0.03	0.27
Schedule 15 Commercial	(0.48)	6.60	0.16	0.25	0.21		0.95	0.20	0.27	0.03	0.27
Schedule 32	(0.27)	3.68	0.08	0.21	2.55		1.14	0.11	0.15	0.04	0.15
Schedule 38	(0.27)	4.08	0.09	0.39	0.21		1.05	0.12	0.16	0.04	0.17
Schedule 47	(0.45)	6.03	0.13	0.50	0.21		1.38	0.18	0.24	0.07	0.24
Schedule 49	(0.30)	4.34	0.10	0.15	0.21		1.38	0.13	0.18	0.06	0.18
Schedule 83-S	(0.18)	3.00	0.06	0.06	2.04		1.13	0.09	0.12	0.04	0.12
Schedule 85-S	(0.15)	2.50	0.06	0.04	0.21		1.10	0.08	0.10	0.04	0.10
Schedule 89-S	(0.12)	1.46	0.05	0.01	0.21		1.02	0.06	0.08	0.03	0.10
Schedule 91	(0.46)	6.63	0.15	0.25	0.21		0.95	0.20	0.27	0.03	0.27
Schedule 92	(0.16)	2.62	0.06	0.23	0.21		0.99	0.08	0.11	0.03	0.11
Schedule 95	(0.46)	6.63	0.15	0.25	0.21		0.95	0.20	0.27	0.03	0.27
Schedule 85-P	(0.15)	2.50	0.06	0.04	0.21		1.08	0.07	0.10	0.04	0.10
Schedule 89-P	(0.12)	1.46	0.05	0.01	0.21		1.01	0.06	0.08	0.03	0.08
Schedule 90-P	(0.10)	1.46	0.05	0.01	0.21		0.96	0.06	0.08	0.03	0.08
Schedule 89-T	(0.12)	1.46	0.05	0.01	0.21		1.01	0.07	0.10	0.03	0.10
Schedule 75-T	(0.12)	1.46	0.05	0.01	0.21		1.01	0.07	0.10	0.03	0.10
Schedule 76R											
Schedule 485-S V2003	(0.05)	2.50	0.05	0.04	0.04			0.08	0.10		0.10
Schedule 485-S V2010	(0.05)	2.50	0.05	0.04	0.04			0.08	0.10		0.10
Schedule 485-S V2011	(0.05)	2.50	0.05	0.04	0.04			0.08	0.10		0.10
Schedule 485-S V2012	(0.05)	2.50	0.05	0.04	0.04			0.08	0.10		0.10
Schedule 485-S V2013	(0.05)	2.50	0.05	0.04	0.04			0.08	0.10		0.10
Schedule 485-S V2014	(0.05)	2.50	0.05	0.04	0.04			0.08	0.10		0.10
Schedule 485-S V2015	(0.05)	2.50	0.05	0.04	0.04			0.08	0.10		0.10
Schedule 485-S V2016	(0.05)	2.50	0.05	0.04	0.04			0.08	0.10		0.10
Schedule 485-S V2017	(0.05)	2.50	0.05	0.04	0.04			0.08	0.10		0.10
Schedule 485-S V2018	(0.05)	2.50	0.05	0.04	0.04			0.08	0.10		0.10
Schedule 485-S V2019	(0.05)	2.50	0.05	0.04	0.04			0.08	0.10		0.10
Schedule 485-S V2020	(0.05)	2.50	0.05	0.04	0.04			0.08	0.10		0.10
Schedule 489-S V2014	(0.03)	1.46	0.05	0.01	0.04			0.06	0.08		0.09
Schedule 485-P V2010	(0.05)	2.50	0.06	0.04	0.04			0.07	0.10		0.10
Schedule 485-P V2011	(0.05)	2.50	0.06	0.04	0.04			0.07	0.10		0.10
Schedule 485-P V2012	(0.05)	2.50	0.06	0.04	0.04			0.07	0.10		0.10
Schedule 485-P V2013	(0.05)	2.50	0.06	0.04	0.04			0.07	0.10		0.10
Schedule 485-P V2014	(0.05)	2.50	0.06	0.04	0.04			0.07	0.10		0.10
Schedule 485-P V2015	(0.05)	2.50	0.06	0.04	0.04			0.07	0.10		0.10
Schedule 485-P V2016	(0.05)	2.50	0.06	0.04	0.04			0.07	0.10		0.10
Schedule 485-P V2017	(0.05)	2.50	0.06	0.04	0.04			0.07	0.10		0.10
Schedule 485-P V2018	(0.05)	2.50	0.06	0.04	0.04			0.07	0.10		0.10
Schedule 485-P V2019	(0.05)	2.50	0.06	0.04	0.04			0.07	0.10		0.10
Schedule 485-P V2020	(0.05)	2.50	0.06	0.04	0.04			0.07	0.10		0.10
Schedule 485-P V2021	(0.05)	2.50	0.06	0.04	0.04			0.07	0.10		0.10
Schedule 489-P V2004	(0.03)	1.46	0.05	0.01	0.04			0.06	0.08		0.10
Schedule 489-P V2010	(0.03)	1.46	0.05	0.01	0.04			0.06	0.08		0.10
Schedule 489-P V2011	(0.03)	1.46	0.05	0.01	0.04			0.06	0.08		0.10
Schedule 489-P V2012	(0.03)	1.46	0.05	0.01	0.04			0.06	0.08		0.10
Schedule 489-P V2013	(0.03)	1.46	0.05	0.01	0.04			0.06	0.08		0.10
Schedule 489-P V2014	(0.03)	1.46	0.05	0.01	0.04			0.06	0.08		0.10
Schedule 489-P V2016	(0.03)	1.46	0.05	0.01	0.04			0.06	0.08		0.10
Schedule 489-P V2017	(0.03)	1.46	0.05	0.01	0.04			0.06	0.08		0.10
Schedule 489-P V2018	(0.03)	1.46	0.05	0.01	0.04			0.06	0.08		0.10
Schedule 489-P V2019	(0.03)	1.46	0.05	0.01	0.04			0.06	0.08		0.10
Schedule 689-P V2019	(0.03)	1.46	0.05	0.01	0.04			0.06	0.08		0.08
Schedule 489-T V2007	(0.03)	1.46	0.05	0.01	0.04			0.07	0.09		0.09
Schedule 489-T V2012	(0.03)	1.46	0.05	0.01	0.04			0.07	0.09		0.09
Schedule 489-T V2013	(0.03)	1.46	0.05	0.01	0.04			0.07	0.09		0.09

Rate Impacts by Rate Schedule
At Kroger Recommended Customer Impact Offset
And Portland General Electric Proposed Revenue Requirement
Excluding Public Purpose Charge, Low Income Assistance, and Schedule 129 Revenues

CATEGORY	RATE SCHEDULE	CUSTOMERS	MWH SALES	TOTAL ELECTRIC BILLS		Change	
				CURRENT supplementals except LIA, PPC & Sch 129	PROPOSED supplementals except LIA, PPC & Sch 129	AMOUNT	PCT.
Residential	7	809,036	7,555,010	\$1,017,035,870	\$1,083,909,730	\$66,873,860	6.6%
Employee Discount				(\$1,110,239)	(\$1,165,359)	(\$55,120)	
Subtotal				\$1,015,925,631	\$1,082,744,371	\$66,818,739	6.6%
Outdoor Area Lighting	15	0	14,480	\$3,338,214	\$3,601,934	\$263,721	7.9%
General Service <30 kW	32	94,649	1,576,157	\$202,510,144	\$218,402,509	\$15,892,365	7.8%
Opt. Time-of-Day G.S. >30 kW	38	377	31,528	\$4,511,855	\$4,508,372	(\$3,483)	-0.1%
Irrig. & Drain. Pump. < 30 kW	47	2,775	20,075	\$4,207,083	\$4,434,768	\$227,685	5.4%
Irrig. & Drain. Pump. > 30 kW	49	1,405	61,430	\$9,314,705	\$10,063,139	\$748,434	8.0%
General Service 31-200 kW	83	11,844	2,800,127	\$286,246,767	\$298,930,061	\$12,683,294	4.4%
General Service 201-4,000 kW							
Secondary	85-S	1,304	2,134,357	\$188,800,488	\$188,802,643	\$2,155	0.0%
Primary	85-P	177	612,588	\$50,821,399	\$50,815,480	(\$5,919)	0.0%
Schedule 89 > 4 MW							
Primary	89-P	12	562,911	\$38,860,057	\$38,766,023	(\$94,034)	-0.2%
Subtransmission	89-T/75-T	5	53,697	\$4,426,999	\$4,528,377	\$101,378	2.3%
Schedule 90	90-P	6	2,824,250	\$179,775,368	\$173,986,897	(\$5,788,471)	-3.2%
Street & Highway Lighting	91/95	184	41,836	\$9,743,529	\$11,194,969	\$1,451,440	14.9%
Traffic Signals	92	16	2,576	\$236,573	\$207,389	(\$29,184)	-12.3%
COS TOTALS		921,790	18,291,022	\$1,998,718,812	\$2,090,986,931	\$92,268,119	4.6%
Direct Access Service 201-4,000 kW							
Secondary	485-S	230	518,480	\$8,829,590	\$9,436,231	\$606,641	6.9%
Primary	485-P	57	373,475	\$4,107,920	\$4,355,113	\$247,193	6.0%
Direct Access Service > 4 MW							
Secondary	489-S	1	13,878	\$279,362	\$265,885	(\$13,477)	-4.8%
Primary	489-P	14	1,007,674	\$7,070,747	\$7,186,068	\$115,321	1.6%
Subtransmission	489-T	3	243,839	\$1,428,178	\$1,479,373	\$51,196	3.6%
New Load Direct Access Service > 10MW							
Primary	689-P	1	48,674	\$640,811	\$586,835	(\$53,976)	-8.4%
DIRECT ACCESS TOTALS		306	2,206,020	22,356,608	23,309,504	\$952,897	4.3%
COS AND DA CYCLE TOTALS		922,096	20,497,042	\$2,021,075,419	\$2,114,296,435	\$93,221,016	4.6%

Schedule 85 Bill Impacts
Effect of Proposed Rate Change on Monthly Bills
At Kroger Recommended Customer Impact Offset
And Portland General Electric Proposed Revenue Requirement

Tariff Schedule 85, Secondary, 3 phase service.
 Bill Comparison assumes 60% on-peak, 40% off-peak energy consumption

Net Monthly Bill

<u>Load Factor</u>	<u>kW</u>	<u>kWh</u>	<u>Current Prices</u>	<u>Proposed Prices</u>	<u>Percent Difference</u>
30%	200	43,800	\$4,983.72	\$5,208.91	4.5%
30%	300	65,700	\$7,061.75	\$7,259.86	2.8%
30%	500	109,500	\$11,217.90	\$11,361.75	1.3%
30%	700	153,300	\$15,374.02	\$15,463.61	0.6%
30%	800	175,200	\$17,452.04	\$17,514.57	0.4%
30%	900	197,100	\$19,530.13	\$19,565.50	0.2%
30%	1,000	219,000	\$21,608.18	\$21,616.46	0.0%
30%	1,500	328,500	\$31,998.48	\$31,871.16	-0.4%
30%	2,000	438,000	\$42,388.77	\$42,125.89	-0.6%
30%	4,000	876,000	\$81,614.95	\$80,705.36	-1.1%
50%	200	73,000	\$7,015.14	\$7,136.60	1.7%
50%	300	109,500	\$10,108.93	\$10,151.39	0.4%
50%	500	182,500	\$16,296.48	\$16,180.96	-0.7%
50%	700	255,500	\$22,484.01	\$22,210.52	-1.2%
50%	800	292,000	\$25,577.78	\$25,225.31	-1.4%
50%	900	328,500	\$28,671.56	\$28,240.09	-1.5%
50%	1,000	365,000	\$31,765.32	\$31,254.88	-1.6%
50%	1,500	547,500	\$47,234.20	\$46,328.81	-1.9%
50%	2,000	730,000	\$62,703.06	\$61,402.73	-2.1%
50%	4,000	1,460,000	\$120,456.86	\$117,402.82	-2.5%
70%	200	102,200	\$9,046.55	\$9,064.30	0.2%
70%	300	153,300	\$13,156.07	\$13,042.89	-0.9%
70%	500	255,500	\$21,375.04	\$21,000.16	-1.8%
70%	700	357,700	\$29,594.00	\$28,957.44	-2.2%
70%	800	408,800	\$33,703.51	\$32,936.04	-2.3%
70%	900	459,900	\$37,812.98	\$36,914.69	-2.4%
70%	1,000	511,000	\$41,922.47	\$40,893.31	-2.5%
70%	1,500	766,500	\$60,426.80	\$58,652.00	-2.9%
70%	2,000	1,022,000	\$80,282.18	\$77,822.65	-3.1%
70%	4,000	2,044,000	\$159,236.78	\$154,038.27	-3.3%
90%	200	131,400	\$11,077.99	\$10,991.98	-0.8%
90%	300	197,100	\$16,203.21	\$15,934.43	-1.7%
90%	500	328,500	\$26,453.61	\$25,819.38	-2.4%
90%	700	459,900	\$36,704.01	\$35,704.33	-2.7%
90%	800	525,600	\$41,829.22	\$40,646.78	-2.8%
90%	900	591,300	\$46,954.43	\$45,589.25	-2.9%
90%	1,000	657,000	\$52,079.61	\$50,531.73	-3.0%
90%	1,500	985,500	\$75,078.76	\$72,499.78	-3.4%
90%	2,000	1,314,000	\$99,672.14	\$96,140.37	-3.5%
90%	4,000	2,628,000	\$198,016.69	\$190,673.72	-3.7%

Schedule 85 Bill Impacts
Effect of Proposed Rate Change on Monthly Bills
At Kroger Recommended Customer Impact Offset
And Portland General Electric Proposed Revenue Requirement

Tariff Schedule 85, Primary, 3 phase service.
 Bill Comparison assumes 60% on-peak, 40% off-peak energy consumption

Net Monthly Bill

<u>Load Factor</u>	<u>kW</u>	<u>kWh</u>	<u>Current Prices</u>	<u>Proposed Prices</u>	<u>Percent Difference</u>
30%	200	43,800	\$4,796.98	\$5,109.11	6.5%
30%	300	65,700	\$6,828.24	\$7,136.51	4.5%
30%	500	109,500	\$10,890.75	\$11,191.33	2.8%
30%	700	153,300	\$14,953.22	\$15,246.11	2.0%
30%	800	175,200	\$16,984.46	\$17,273.51	1.7%
30%	900	197,100	\$19,015.70	\$19,300.91	1.5%
30%	1,000	219,000	\$21,046.96	\$21,328.32	1.3%
30%	1,500	328,500	\$31,203.22	\$31,465.31	0.8%
30%	2,000	438,000	\$41,359.43	\$41,602.31	0.6%
30%	4,000	876,000	\$79,649.38	\$79,710.93	0.1%
50%	200	73,000	\$6,789.44	\$7,015.25	3.3%
50%	300	109,500	\$9,816.94	\$9,995.73	1.8%
50%	500	182,500	\$15,871.90	\$15,956.67	0.5%
50%	700	255,500	\$21,926.85	\$21,917.59	0.0%
50%	800	292,000	\$24,954.31	\$24,898.05	-0.2%
50%	900	328,500	\$27,981.81	\$27,878.52	-0.4%
50%	1,000	365,000	\$31,009.27	\$30,858.98	-0.5%
50%	1,500	547,500	\$46,146.68	\$45,761.33	-0.8%
50%	2,000	730,000	\$61,284.05	\$60,663.66	-1.0%
50%	4,000	1,460,000	\$117,711.95	\$115,977.38	-1.5%
70%	200	102,200	\$8,781.91	\$8,921.39	1.6%
70%	300	153,300	\$12,805.61	\$12,854.91	0.4%
70%	500	255,500	\$20,853.06	\$20,722.00	-0.6%
70%	700	357,700	\$28,900.46	\$28,589.05	-1.1%
70%	800	408,800	\$32,924.16	\$32,522.58	-1.2%
70%	900	459,900	\$36,947.89	\$36,456.12	-1.3%
70%	1,000	511,000	\$40,971.58	\$40,389.66	-1.4%
70%	1,500	766,500	\$59,047.02	\$57,922.89	-1.9%
70%	2,000	1,022,000	\$78,473.50	\$76,868.07	-2.0%
70%	4,000	2,044,000	\$155,712.51	\$152,181.82	-2.3%
90%	200	131,400	\$10,774.35	\$10,827.52	0.5%
90%	300	197,100	\$15,794.31	\$15,714.11	-0.5%
90%	500	328,500	\$25,834.21	\$25,487.33	-1.3%
90%	700	459,900	\$35,874.08	\$35,260.52	-1.7%
90%	800	525,600	\$40,894.02	\$40,147.13	-1.8%
90%	900	591,300	\$45,913.94	\$45,033.71	-1.9%
90%	1,000	657,000	\$50,933.88	\$49,920.33	-2.0%
90%	1,500	985,500	\$73,406.74	\$71,609.05	-2.4%
90%	2,000	1,314,000	\$97,473.79	\$94,970.29	-2.6%
90%	4,000	2,628,000	\$193,713.09	\$188,386.27	-2.7%

CERTIFICATE OF SERVICE

I hereby certify that true copy of the foregoing was served via electronic mail, unless otherwise noted, this 25th day of October, 2021.

/s/ Kurt J. Boehm

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