



# PORTLAND BUSINESS ALLIANCE

*Leading the way*

August 27, 2010

Public Utility Commission of Oregon  
550 Capitol St NE #215  
PO Box 2148  
Salem OR 97308-2148

Dear Commissioners:

As an intervenor in LC 48, Portland General Electric's (PGE) Integrated Resource Plan filing, the Portland Business Alliance (PBA) strongly urges Oregon Public Utility Commission (OPUC) support for PGE's proposal to meet new emissions standards for the Boardman Power Plant by installing interim control retrofits and then ending the use of coal in 2020. PBA represents more than 1,300 businesses in the Portland area. Our mission is to promote and foster an environment in the Portland region that attracts, supports and retains private sector jobs, spurs economic vitality and enables quality educational opportunities for the region's residents.

PBA believes a reasonable 2020 option for the Boardman plant is the responsible path forward. PGE's amended IRP filing was updated in the company's August 10 reply comments to include additional pollution controls proposed by the Oregon Department of Environmental Quality (DEQ). It is the right choice from a least cost/least risk perspective. The amended 2020 option meets the Best Available Retrofit Technology (BART) required by the Regional Haze Rule in a cost effective manner. We urge the Commission to acknowledge PGE's 2020/BART III proposal.

The options proffered by the DEQ either do not provide adequate time to transition to replacement power, or are unworkable from a technical perspective—or simply cost ratepayers too much. PBA is concerned that a closure prior to 2020, coupled with the need for replacement power, will result in unjustifiable costs at a time when electricity rates are already increasing. The 2020 proposal in the amended IRP allows time to bring on replacement resources; we would object to any plan that calls for the removal of an important base resource like Boardman before a similarly-reliable resource can be built to replace it.

Given the importance of the Boardman plant as a base load, low cost generation resource, it is critical that the path forward does not impose greater costs, price volatility or reliability risks for ratepayers. There is an opportunity to set a national

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precedent – and do what is right for ratepayers and the environment – by supporting PGE’s amended IRP filing. Should the DEQ Regional Haze Rule result in an option other than PGE’s amended 2020 plan, the most prudent course of action from a cost and reliability perspective will be to install the full suite of controls and continue to operate Boardman to 2040 or beyond.

We strongly believe that PGE’s amended 2020 plan is the best path forward. Interest in a workable 2020 plan is broadly shared, as you will note in the attached letter sent to the DEQ on 8/10/10 from the 39 businesses, associations, individuals, and elected officials.

Sincerely,



Bernie Bottomly  
Vice President  
Government Relations & Economic Development

August 10, 2010

Mr. Brian Finneran  
Oregon Department of Environmental Quality  
811 SW 6<sup>th</sup> Avenue  
Portland, OR 97204-1390

Dear Mr. Finneran:

We the undersigned, believe that a responsible transition away from coal burning in the state by 2020 is the right plan for Oregon. Unfortunately, the recent alternatives the DEQ introduced are unworkable and add unnecessary costs on Oregon families and especially to small businesses at a time when the entire state is struggling to recover from one of the worst recessions in generations.

We represent more than 50,000 businesses who count on PGE for about 10.5 billion kilowatt hours annually of affordable, reliable electricity. In fact, more than 58 percent of all electricity consumed in PGE's service territory is transmitted to business customers. Businesses located within PGE's service territory are the economic engine for Oregon, accounting for 70 percent of the state's gross domestic product. So we have a huge stake in the outcome of the DEQ's decision on Boardman.

We recognize that the health of our environment plays an important role in ensuring that our region maintains livability and economic and cultural vitality. We believe that a balanced approach that takes into consideration environmental objectives AND the economic impacts on Oregon homes and businesses is the right approach. A truly reasonable solution for Boardman is one that achieves three important objectives: 1) Provides adequate transition time to find replacement power; 2) allows time for workers and the Boardman community to make the transition; and 3) has minimal cost impacts on Oregon homes and businesses.

At minimum, DEQ needs to address concerns we have regarding your proposals and fiscal analysis. Each of the three options DEQ offered are flawed: much too costly, don't provide enough time to develop replacement resources, conflict with other EPA policies, rely on unproven technology, or all of the above. Additionally, from a business perspective, we find it particularly objectionable that DEQ failed to adequately address in its fiscal impact statement the true costs customers would face if Boardman were shut down prior to 2020 and PGE had to build or find replacement power to fill the gap. Replacement power costs represent real costs to Oregon businesses and families, and it's the responsibility of DEQ to fairly incorporate those costs in order for interested individuals to have a true picture of what they can expect, especially concerning the ongoing economic challenges we face in this state.

PGE has come forward with a good faith effort to close the Boardman Plant a full two decades earlier than planned. It seems to us that that instead of finding ways to support this effort, the DEQ is putting roadblocks in the way – roadblocks that could leave PGE with no choice but to continue operation of Boardman through 2040, as previously approved by your agency and the EQC. If that occurs, it will be a huge opportunity lost for Oregon, and the responsibility will be squarely on the shoulders of the DEQ and the EQC.

We strongly urge DEQ to change course and work with Portland General Electric to develop a reasonable 2020 plan for the Boardman Plant to be included in the final proposal for public consideration.

Thank you for your consideration.

Sincerely,

Tualatin Mayor Lou Ogden

Sherwood Mayor Keith Mays

Beaverton Mayor Denny Doyle

Tigard Mayor Craig Dirksen

Hillsboro Mayor Jerry Willey

Oregon State Chamber of Commerce

Oregon Homebuilder's Association

Associated Oregon Industries (AOI)

Portland Business Alliance

Westside Economic Alliance (WEA)

East Metro Economic Alliance

Strategic Economic Development Corporation (SEDCOR)

Beaverton Chamber of Commerce

North Clackamas Chamber of Commerce

Sandy Area Chamber of Commerce

Wilsonville Chamber of Commerce

Canby Area Chamber of Commerce

Silverton Chamber of Commerce

Greater Hillsboro Chamber of Commerce

Tualatin Chamber of Commerce

Woodburn Area Chamber of Commerce

Columbia Corridor Association

Homebuilder Builder's Association of Metro Portland

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Kevin Ferrasci O'Malley, Managing Director  
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Jonae Armstrong, Sr. Property Manager  
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Al's Garden Centers & Greenhouses

Bernard's Garage Inc.

Double B, LLC

Daibuc Properties, LLC

Logotek Inc.

Eagle Foundry Company

Wescott's Auto Restyling

## CERTIFICATE OF SERVICE

I hereby certify that I have this day caused the attached comments of Portland Business Alliance regarding OPUC Docket No. LC 48 – Portland General Electric’s Integrated Resource Plan to be served by electronic mail to those parties whose email addresses appear on the attached service list, and by First Class US Mail, postage prepaid and properly addressed, to those parties on the attached service list who have not waived paper service from OPUC Docket No. LC 48.

Dated at Portland, Oregon, this 30th day of August, 2010.

A handwritten signature in black ink that reads "Bernie Bottomly". The signature is written in a cursive, flowing style.

Bernie Bottomly  
Portland Business Alliance  
200 SW Market, Suite L150  
Portland, OR 97201



**SERVICE LIST  
OPUC DOCKET # LC 48**

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