BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

LC 48

In the Matter of PORTLAND GENERAL ELECTRIC 2009 Integrated Resource Plan	)))))))))

RESPONSE COMMENTS

OF THE

JOINT PARTIES

May 19, 2010

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I. Introduction

The Citizens' Utility Board, Renewable Northwest Project, NW Energy Coalition, Oregon Environmental Council, Angus Duncan, Ecumenical Ministries of Oregon, Sierra Club, and Northwest Environmental Defense Center (hereafter referred to as "Joint Parties") have joined together to urge the Commission not to acknowledge hundreds of millions of dollars of investment in the Boardman coal plant. The 2040 investment is a risky, costly strategy for PGE and its ratepayers, jeopardizes Oregon's environment, and should not be acknowledged—even as a back-up plan—in this IRP.

Our collective goals for PGE's treatment of the Boardman plant are: 1) to protect ratepayers by keeping the costs of closure and replacement power under control; 2) to protect the environment and reduce greenhouse gas emissions by shuttering a coal plant early, complying with Clean Air Act regulations, and developing a clean energy solution for replacement power; and 3) to provide a path for other utilities to follow in responsibly shutting down their coal plants early.

We have a unique opportunity to design a broadly supported path to close Boardman that avoids wasteful investment in a coal plant, balances environmental protection with rate impacts, addresses any realistic reliability concerns, and outlines a plan for replacement power for Boardman and reduces the emissions profile of PGE's entire portfolio. At minimum, a replacement power plan should be significantly cleaner and more flexible than only a base-load gas plant, better positioning both the utility and Oregon for future emissions requirements and for integration into a cleaner, modern electricity grid.

A basis for this path to responsible closure of Boardman does exist, but is likely to not be fully completed before the end of the current IRP process. Thus, we urge the Commission to acknowledge only those pollution controls that are immediately necessary and to decline to acknowledge—even as a back-up—any portfolio that would continue to operate Boardman through 2040. This will allow room for the Company, regulators and stakeholders to agree on a comprehensive plan to accomplish the responsible closure of Boardman.

We believe there is still room to find an early closure solution that is both acceptable to DEQ and has broad-based support from the company and stakeholders. Closing the plant early is the best way to control pollution and address Oregon's largest source of greenhouse gas emissions. DEQ can guarantee an early closure by working to find a suite of interim pollution control technologies that acceptably balances economic and environmental impacts. Thus, while the Joint Parties agree that a 2015/16 closure is superior to any 2040 portfolio on a least-cost, least-risk basis, we continue to encourage PGE and DEQ to use the strong basis created by both DEQ's 2018 proposal and PGE's BART III proposal (neither of which we are prepared to endorse as a group) to craft a broadly supported plan to responsibly close Boardman *and* transition PGE to a cleaner energy future.

In the comments that follow, we explain: (1) why we believe that the Commission need not, and should not, acknowledge a risky and environmentally harmful 2040 investment; and (2) our views of what a responsible alternative could include.

II. PGE's 2040 Back-Up Plan (BART I) Is Not A Least Cost, Least Risk Alternative

Paying the full $500 million for pollution controls and hoping to run the plant through 2040 (BART I) is the most objectionable option before the PUC. Below, we outline our view of the future regulatory risks presented by the 2040 option, the better uses to which the 2040 investment could be put, and the reasons why it is not necessary for the Commission to acknowledge a 2040 back-up plan in this IRP.

A. Future Regulatory Risk is Unacceptably High.

An important part of the Boardman analysis is PGE's analysis of the carbon risk. We generally support the Company's approach to modeling carbon costs based on the expected costs associated with proposals to address carbon.[1] Carbon regulation is coming. The primary question is when and how much it will cost PGE and other utilities (and their customers) to conform to carbon regulations.

PGE's approach may overstate carbon compliance costs in the short run and understate those costs in the long run. PGE's modeling assumes that the costs will begin in 2013, which is earlier than likely given the current pace of Congressional action. At the same time, PGE assumes that the initial carbon regulatory program will continue for the long term without significant expansion. We believe that carbon regulations will be established and will expand over time as the consequences of climate change become more pronounced. As sea levels rise and other changes become apparent, there will be additional costs placed on carbon emissions.

We have little doubt that additional regulatory pressure will come to bear on coal plants. The MACT standards and coal combustion waste disposal standards are a manifestation of this trend. Coal has a target on its back. There will likely be additional regulatory

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[1] While we support the inclusion of expected carbon *costs* in PGE's deterministic cost analyses, the same cannot be said regarding risk. PGE has no risk metric that reflects CO_2 emissions. Instead the Company's risk analysis adds together results from both high and low carbon-cost futures, which has the effect of removing CO2 costs from its risk metrics.

actions taken that raise the cost of coal-fired generation, including regulations on coal mining and coal ash. And there will likely be federal and state legislative proposals that are designed to reduce or eliminate coal use. Over the next 30 years there will be regulatory costs associated with coal plants that are not considered in PGE's IRP analysis.

B. Superior Investment Alternatives Exist.

There are better ways to spend $500 million of customer money than to invest in an outmoded coal plant. Assuming (for sake of argument) that $100 million is invested towards PGE's proposed BART III option, that would leave $400 million on the table. For that amount of money, PGE could acquire 180-200 aMW of energy efficiency,[2] build 196 MW of wind generation,[3] 108 MW of solar,[4] or 460 MW of combined-cycle natural gas[5] (256 MW with carbon capture and sequestration[6]). Whether invested in a single resource or spread across a number of demand- and supply-side options, this amount of money will go a long way towards replacing a large percentage of the generation from the Boardman plant with cleaner energy sources. These new sources would also be subject to far less regulatory risk than a legacy coal plant that will continue to emit large amounts of carbon.

We believe that there is a better solution. That solution should focus not solely on Boardman, but on Boardman and its replacement resources. We are confident that PGE could replace Boardman's generation, insofar as necessary, with a diverse mix of efficiency and available resources in the 2015/16 time frame without jeopardizing reliability. At the same time, we recognize that there is a risk that the replacement power resource in the 2015/16 time frame could be a new natural gas plant. An additional natural gas plant, when combined with the one already planned, would cause carbon

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[2] Bonneville Power Administration and Northwest Power and Conservation Council past experience and future forecasts indicate approximately $2 million per average MW of energy saved.
[3] NREL JEDI Wind Model.
[4] Black & Veatch, 2010. LTPP Solar PV Performance and Cost Estimates presentation to CPUC. Available at http://www.cpuc.ca.gov/NR/rdonlyres/A0CBE958-E2C4-4AC7-9D56-3AB4D14D723D/0/BVE3PVAssessment.ppt.
[5] "The Cost of New Generating Capacity in Perspective." Nuclear Energy Institute, nei.org. July 2010.
[6] *Ibid.*

emissions to exceed the state's climate goals and leave ratepayers exposed to carbon costs. Allowing the Company, regulators and stakeholders more time to develop a cost-effective replacement portfolio with cleaner, more flexible, and more diverse resources may result in an even better closure scenario.

III. A Responsible Alternative Is Likely To Emerge

We encourage the Commission to acknowledge some immediate investments that are needed for Boardman, but not to acknowledge an enormous investment whose cost-effectiveness depends on the unlikely premise that Boardman will be able to operate until 2040 without substantial additional costs related to carbon and other emissions. At the same time, we recognize that all of the alternatives to 2040 that DEQ has presently sanctioned are problematic to different parties in some way, as we discuss below, and that the Commission may wish to have greater certainty that a good alternative exists. We nonetheless ask the Commission to recognize that a good alternative is emerging, and that acknowledging the 2040 back-up plan may impair momentum toward that emerging alternative.

Each of the current DEQ options is problematic to the company and/or a significant group of stakeholders in some way. Our basic view of the current DEQ alternatives to BART I/2040 is outlined here:

- **DEQ's Option 1 (2020)**: Make $290 million in clean air investments and close the plant by 2020. This option is not cost-effective. Spending $290 million for an additional 5 years of operations makes little sense, and would push electricity rates higher with little gain for consumers.

- **DEQ's Option 2 (2018)**: Make about $100 million in clean air investments and close the plant by 2018. This option could potentially form the basis for a broadly supported plan, as we discuss below, but there are questions about whether it can achieve the emissions reductions desired at the cost estimated. The pollution control technology that goes along with this option, while proven at a smaller scale, has never been utilized at a plant of Boardman's size. There is a chance that it will cause Boardman to violate permits for particulate matter. Additional technology to avoid violation of those permits could increase the cost of this option by up to $100 million, which may unacceptably increase the cost to consumers. We outline potential variations on this option below, but recognize that any alternative solution must fully comply with federal clean air regulations.

- **DEQ's Option 3 (2015/16)**: Make $50 million in clean air investments by 2011, and close the plant by 2015 or 2016. We support closing the plant as early as possible and believe that closure on this timeline is a viable option for the company. Nonetheless, as discussed above, we encourage PGE, environmental regulators, and stakeholders to continue to work toward a more broadly supported alternative that satisfies clean air regulations, minimizes rate and reliability impacts, and ensures that PGE is on a path to meeting Oregon's CO_2 reduction goals. This type of outcome could set a national precedent for responsible closure of coal plants.

In response to the DEQ options, PGE has proposed a "BART III" approach, which builds on its original 2020 closure plan (BART II) and integrates some of the technology approaches contained in DEQ's Option 2. The significant difference between DEQ's Option 2 and PGE's BART III is that the investment in Dry Sorbent Injection (DSI) would first be tested to determine how it would work in a plant like Boardman, and would then be applied on an ongoing basis in such a way that there is no violation of particulate matter regulation. While the company says it will work to lower NOx and SOx emissions to the lowest level possible, it is asking for flexibility in meeting SO_2 emissions limits and guaranteeing that the particulate matter emissions would not cross a threshold to trigger new regulations. Lastly, in the other key difference from DEQ's Option 2, PGE wants to run the plant through 2020, rather than the 2018 closure that DEQ seeks, in order to recover the cost of the investment more efficiently.

As noted earlier, we are not prepared as a group to endorse either the DEQ 2018 or the PGE BART III plan. However, we believe that a fully-developed plan for responsible closure can still gain broad-based support and comply fully with federal clean air controls. Several additional elements should be explored when developing this plan. First, strong efforts to reduce the carbon emissions profile of replacement power (and of PGE's entire portfolio) are important to many diverse stakeholders, and should be a critical element in any responsible closure plan. Working closely with stakeholders to develop the highest-quality resource portfolio to help meet air quality requirements, $C0_2$ reduction standards and customer electricity needs is critical for ensuring that the replacement resources selected in the next IRP are the most appropriate ones for the company's ratepayers and Oregon's environment. Second, alternatives that could encourage broader support and potentially aid in meeting clean air regulations could include: (1) operating the plant differently (*i.e.*, seasonally or in emergency circumstances only) to reduce environmental effects while addressing reliability and cost-recovery concerns; (2) installing SOx and NOx controls earlier to gain greater environmental benefit during the period of operation without incurring higher capital costs.

IV. Conclusion

A basis for a broadly supported plan does exist, but it is unlikely to be completed before the end of the current IRP process. Thus, we urge the Commission to recognize operation through 2040 as the most dangerous outcome and acknowledge only what is immediately necessary, creating space for the Company, regulators and stakeholders to agree on a comprehensive plan to accomplish the responsible closure of Boardman, in accordance with the principles outlined at the beginning of these comments. We recognize that allowing time for utility regulators to coordinate with environmental regulators and stakeholders is a unique position for the Commission. We believe, however, that flexibility remains necessary to reach a sensible, durable outcome for both ratepayers and the environment.

In short, we urge the Commission to 1) acknowledge only Phase I of the clean air investments; 2) not acknowledge any option that keeps the plant operating until 2040; and 3) if necessary, leave the door open for an amendment to this IRP after more clarity has been achieved in the DEQ process.

We appreciate the opportunity to submit these comments.

Respectfully Submitted,
September 1, 2010

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LC 48 – CERTIFICATE OF SERVICE

I hereby certify that, on this 1st day of September, 2010, I served the foregoing **RESPONSE COMMENTS OF THE JOINT PARTIES** in docket LC 48 upon each party listed in the LC 48 OPUC Service List by email and, where paper service is not waived, by U.S. mail, postage prepaid, and upon the Commission by email and by sending an original and one copy by U.S. mail, postage prepaid, to the Commission's Salem offices.

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