



PORTLAND BUSINESS ALLIANCE

Leading the way

October 26, 2010

Public Utility Commission of Oregon
550 Capital Street NE, #215
PO Box 2148
Salem, OR 97308

Dear Commissioners:

The Portland Business Alliance, an intervener in LC 48, would like to offer the following comments on the Staff Report.

We strongly support staff's recommendation that the Commission acknowledge PGE's 2020 operating plan for the Boardman Power Plant as part of the IRP. PGE has completed extensive analysis of the various emissions control options under discussion for Boardman, and it is our belief that a reasonable plan on the 2020 timeframe will provide the best balance of cost and risk for PGE customers while achieving significant environmental benefits for Oregon. PGE has made every effort to be responsive to stakeholder concerns and has produced a strong, responsible proposal that it should be allowed to implement.

We appreciate staff's acknowledgement as well that the DEQ 2015/2016 option for Boardman is not an acceptable or realistic proposal. We do not believe advocates of a 2015/2016 closure for the Boardman plant have offered any credible reason to expect that reliable and affordable replacement resources can be acquired or built within such a short timeframe.

The Alliance is heartened by the progress that has been made in finding common ground among interveners and PGE to identify Boardman replacement resource options to be considered by the Commission in its Integrated Resource Planning process. The Alliance welcomes and supports the continued efforts to seek agreement in this area.

Thank you for your consideration of comments.

Sincerely,

Bernie Bottomly
Vice President

CERTIFICATE OF SERVICE

I hereby certify that I have this day caused comments 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 October 27, 2010.



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

**SERVICE LIST
OPUC DOCKET # LC 48**

Bruce A. Kaser brucekaser@comcast.net (*Waived Paper Service)	Kelly Nokes crk@gorge.net (*Waived Paper Service)
John Ledger, Vice President ASSOCIATED OREGON INDUSTRIES johnledger@aoi.org (*Waived Paper Service)	Paul Snider ASSOCIATION OF OREGON COUNTIES PO Box 12729 Salem, OR 97309 psnider@aocweb.org
Janet L. Prewitt, Asst. Attorney General DEPARTMENT OF JUSTICE Janet.prewitt@doj.state.or.us (*Waived Paper Service)	Andrea Simmons OREGON DEPARTMENT OF ENERGY Andrea.f.simmons@state.or.us (*Waived Paper Service)
Kip Pheil, Sr. Policy Analyst OREGON DEPARTMENT OF ENERGY kip.pheil@state.or.us (*Waived Paper Service)	Vijay A. Satyal, Sr. Policy Analyst OREGON DEPARTMENT OF ENERGY vijay.a.satyal@state.or.us (*Waived Paper Service)
Susan Steward, Executive Director BOMA PORTLAND 200 SW Market, Suite 1710 Portland, OR 97201 susan@bomaportland.org	Richard Lorenz CABLE HUSTON BENEDICT, ET AL rlorenz@cablehuston.com (*Waived Paper Service)
J. Laurence Cable CABLE HUSTON BENEDICT, ET AL lcable@chbh.com (*Waived Paper Service)	Jess Kincaid, Oregon Energy Partnership Coord. CAPO jess@capo.org (*Waived Paper Service)
Gordon Feighner, Energy Analyst CITIZENS UTILITY BOARD gordon@oregoncub.org (*Waived Paper Service)	G. Catriona McCracken, Legal Counsel CITIZENS UTILITY BOARD catriona@oregoncub.org (*Waived Paper Service)
Robert Jenks CITIZENS UTILITY BOARD bob@oregoncub.org (*Waived Paper Service)	David Tooze, Senior Energy Specialist CITY OF PORTLAND david.tooze@portlandoregon.gov (*Waived Paper Service)
Burton West, Executive Director CLACKAMAS CO. BUSINESS ALLIANCE burton@ccba.biz (*Waived Paper Service)	Corky Collier COLUMBIA CORRIDOR ASSOCIATION corky@ColumbiaCorridor.org (*Waived Paper Service)
Lauren Goldberg COLUMBIA RIVERKEEPER Lauren@columbiariverkeeper.org (*Waived Paper Service)	John DiLorenzo DAVIS WRIGHT TREMAINE LLP johndilorenzo@dwt.com (*Waived Paper Service)
Mark P. Trinchero DAVIS WRIGHT TREMAINE LLP marktrinchero@dwt.com (*Waived Paper Service)	Irion Sanger DAVISON VAN CLEVE 333 SW Taylor, Suite 400 Portland, OR 97204 mail@dvcclaw.com

Stephanie S. Andrus, Asst. Attorney General DEPARTMENT OF JUSTICE Regulated Utility & Business Section 1162 Court St NE Salem, OR 97301-4096 Stephanie.andrus@state.or.us	James Edelson ECUMENICAL MINISTRIES OF OREGON Edelson8@comcast.com (*Waived Paper Service)
Jenny Holmes, Environmental Ministries Director ECUMENICAL MINISTRIES OF OREGON jholmes@emoregon.org (*Waived Paper Service)	John W. Stephens ESLER STEPHENS & BUCKLEY stephens@elserstephens.com (*Waived Paper Service)
Michael Lang FRIENDS OF COLUMBIA GORGE Michael@gorgefriends.com (*Waived Paper Service)	Kevin Lynch IBERDROLA RENEWABLES, INC. 1125 NW Couch St, Ste 700 Portland, OR 97209 Kevin.lynch@iberdrolausa.com
Toan-Hao Nguyen IBERDROLA RENEWABLES, INC. 1125 NW Couch St Portland, OR 97209 toan.nguyen@iberdrolausa.com	Michael Early, Director INDUSTRIAL CUSTOMERS OF NW UTILITIES 333 SW Taylor, Suite 400 Portland, OR 97204 mearly@icnu.org
Marcy Putnam, Political Affairs IBEW LOCAL 125 17200 NE Sacramento Street Portland, OR 97230 marcy@ibew125.com	Ryan M. Swinburnson MORROW COUNTY r_swinburnson@verizon.net (*Waived Paper Service)
Steven Weiss, Sr. Policy Associate NORTHWEST ENERGY COALITION steve@nwenergy.org (*Waived Paper Service)	Mark Riskedahl NW ENVIRONMENTAL DEFENSE CENTER msr@nedc.org (*Waived Paper Service)
David Zepponi, President NW FOOD PROCESSORS ASSOCIATION 8338 NE Alterwood Road, Ste 160 Portland, OR 97220 pbarrow@nwfpa.org	Bruce Reemsnyder NW PIPELINE, GP bruce.reemsnyder@williams.com (*Waived Paper Service)
Jane Harrison NW PIPELINE, GP Jane.f.harrison@williams.com (*Waived Paper Service)	Robert D. Kahn, Executive Director NW INDEPENDENT POWER PRODUCERS rkahn@nippc.org (*Waived Paper Service)
John Bishop OREGON AFL-CIO jbishop@mbjlaw.com (*Waived Paper Service)	Kay Teisl OREGON CATTLEMEN'S ASSOCIATION 3415 Commercial St SE, Suite 217 Salem, OR 97302 kayteisl@orcattle.com
Sue Oliver OREGON DEPARTMENT OF ENERGY sue.oliver@state.or.us (*Waived Paper Service)	Jana Gastellum, Program Director, Global Warming OREGON ENVIRONMENTAL COUNCIL 222 NW Davis St, Ste 390 Portland, OR 97309-3900 janag@oeconline.org

Katie Fast, Director of Government Affairs OREGON FARM BUREAU FEDERATION katie@oregonfb.org (*Waived Paper Service)	Ray Wilkeson OREGON FOREST INDUSTRIES COUNCIL ray@ofic.com (*Waived Paper Service)
Terry Witt, Executive Director OREGONIANS FOR FOOD AND SHELTER Terry@ofsonline.org (*Waived Paper Service)	Ivan Maluski SIERRA CLUB ivan.maluski@sierraclub.org (*Waived Paper Service)
Aubrey Baldwin, Staff Atty/Clinical Professor PACIFIC ENVIRONMENTAL ADVOCACY CENTER abaldwin@lclark.edu (*Waived Paper Service)	Allison LaPlante PACIFIC ENVIRONMENTAL ADVOCACY CENTER laplante@lclark.edu (*Waived Paper Service)
Pete Warnken, Manager, IRP PACIFICORP pete.warnken@pacificorp.com (*Waived Paper Service)	Jordan A. White, Senior Counsel PACIFIC POWER & LIGHT jordan.white@pacificorp.com (*Waived Paper Service)
Guy Warner PARETO POWER, LTD gwarner@paretoenergy.com (*Waived Paper Service)	Catherine Thomasson, Climate Change Chair PHYSICIANS FOR SOCIAL RESPONSIBILITY, OREGON CHAPTER thomassonc@comcast.net (*Waived Paper Service)
Steve King, Generation Resources Manager PNGC POWER sking@pngcpower.com (*Waived Paper Service)	John Prescott, President & CEO PNGC POWER jprescott@pngcpower.com (*Waived Paper Service)
Bernie Bottomly, Vice President PORTLAND BUSINESS ALLIANCE bbottomly@portlandalliance.com (*Waived Paper Service)	Benjamin Walters, Deputy City Attorney CITY OF PORTLAND bwalters@ci.portland.or.us (*Waived Paper Service)
Michael Armstrong, Energy Policy CITY OF PORTLAND Michael.Armstrong@portlandoregon.gov (*Waived Paper Service)	Maury Galbraith PUBLIC UTILITY COMMISSION OF OREGON PO Box 2148 Salem, OR 97301 maury.galbraith@state.or.us
Megan Walseth Decker, Senior Staff Counsel RENEWABLE NORTHWEST POWER 917 S.W. Oak, Suite 303 Portland, Oregon 97205 megan@rnp.org	Ken Dragoon RENEWABLE NORTHWEST PROJECT 917 S.W. Oak, Suite 303 Portland, Oregon 97205 ken@rnp.org
Gregory Marshall Adams RICHARDSON & O'LEARY greg@richardsonandoleary.com (*Waived Paper Service)	Peter J. Richardson RICHARDSON & O'LEARY peter@richardsonandoleary.com (*Waived Paper Service)
Mike McLaran, CEO SALEM CHAMBER OF COMMERCE mike@salemchamber.org jason@salemchamber.org (*Waived Paper Service)	Raymond Burststedt, President SEDCOR 625 High Street NE, Suite 200 Salem, OR 97301 rburststedt@sedcor.com

<p>Gloria D. Smith SIERRA CLUB LAW PROGRAM Gloria.smith@sierraclub.org (*Waived Paper Service)</p>	<p>Randy Baysinger, Asst General Manager TURLOCK IRRIGATION DISTRICT rcbaysinger@tid.org (*Waived Paper Service)</p>
<p>Jonathan Schlueter WESTSIDE ECONOMIC ALLIANCE jschlueter@westside-alliance.org (*Waived Paper Service)</p>	<p>Ray Phelps WILSONVILLE CHAMBER OF COMMERCE RPhelps@republicservices.com steve@wilsonvillechamber.com (*Waived Paper Service)</p>