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May 15, 2010

Public Utility Commission of Oregon
550 Capitol St NE #215
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Dear Commissioners:

As an intervenor in LC 48, Portland General Electric's ("PGE") Integrated Resource Plan filing, the Oregon Cattlemen's Association (OCA) strongly urges the commission's support of the amended resource plan. As the voice of the cattle industry in Oregon, the OCA's mission is to promote environmentally and socially sound practices, to improve and strengthen the economics of the cattle industry and to advance the economic, political and social interests of the cattle industry and the communities we represent. Cattle was Oregon's top agricultural commodity in 2008 with \$664 million in sales, surpassing nursery crops (when excluding greenhouse crops) for the first time in recent history and ahead of dairy, wheat and farm forest products. We are an important part of this state's economic engine and are concerned about how regulatory changes affect the business climate.

The OCA, and its 1,900 members, urge commission approval of the PGE's 2020 strategy for closing the Boardman Coal Plant, or the alternative plan to install more extensive emission controls to keep the plant operating until 2040. The OCA believes this plan meets the OPUC's principle objectives for least cost planning and reliability. The OCA is very concerned that if PGE is forced to close the Boardman facility prior to what is suggested in PGE's proposed plan, that the increased cost pressure on PGE's rates for replacement power would be harmful to our members who are served by PGE. Electricity costs, especially for those members who have pumping costs, are a major cost driver for our members. Coupled with other regulatory costs, a potential "pass through" environmental cost of early Boardman closure would have a negative effect on the agricultural community. Further, we believe that the 2020 proposal 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.

We strongly believe that PGE's 2020 Plan represents the best path forward, providing the right balance of environmental and economic concerns. PGE notes that this plan will be difficult to achieve and that the support of the Oregon Public Utility Commission for this strategy will send a positive signal and be key to obtaining the additional regulatory or legislative fixes necessary to make it happen.

On behalf of the Oregon Cattlemen's Association and our 1,900 members, I urge you to send a strong signal of support by acknowledging PGE's Boardman 2020 proposal contained in its revised IRP filing of April 9th, 2010.

Sincerely,
/s/
Kay Teisl
Executive Director

~ Voice of the Oregon Cattle Industry Since 1913 ~