



OFIC

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Oregon Forest Industries Council

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October 29, 2010

Ray Baum
Susan Ackerman
John Savage

RE: PGE's 2020 Boardman Plan

Dear Commissioners,

As intervenors in the matter of LC 48, Portland General Electric's integrated resource plan filing, the Oregon Forest Industries Council submits the following comments in response to Oregon Public Utility Commission's staff draft order:

1. 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 made every effort to be responsive to stakeholder concerns and has produced a strong, responsible proposal that it should be allowed to implement.

2. We appreciate staff's opinion that the DEQ 2015/2016 option for Boardman is not an acceptable or realistic proposal. Advocates of a 2015/2016 closure for the Boardman plant have not offered any credible reason to expect that reliable replacement resources can be acquired or built within such a short timeframe, which throws this proposal into direct conflict with PGE's responsibility to provide reliable electric service at a reasonable cost to customers. We agree that such a proposal deserves no further consideration.

3. We remain concerned that staff's recommendation does not give PGE the certain course of action necessary to implement its resource plan if a reasonable 2020 Boardman proposal is not adopted by the Environmental Quality Commission and approved by the federal Environmental Protection Agency. We believe that the staff should have recommended PGE's request for acknowledgement of a 2040 "backstop" if a reasonable 2020 plan is not approved. From our perspective, the EQC has already acted on the 2040 plan. It is an approved path for BART compliance and PGE's analysis has shown that it represents the best balance of cost and risk for customers if a reasonable 2020 plan is not adopted. We believe that the Commission should not delay implementation of PGE's action plan further by insisting that PGE return to the Commission if the EQC doesn't approve PGE's 2020 plan. Instead, the Commission should acknowledge the action that the EQC has already taken and allow PGE to proceed with the 2040 plan unless an acceptable 2020 plan is made actionable by EQC approval.

Thank you for the opportunity to make these comments.

Respectfully submitted,

/s/
Ray Wilkeson
President, OFIC

CERTIFICATE OF SERVICE

I hereby certify that I have this day caused the attached comments from OFIC regarding LC 48 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 Salem, Oregon, this twenty ninth day of October, 2010.

Ray Wilkeson

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