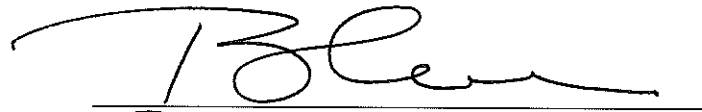


CERTIFICATE OF SERVICE

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 at Portland, Oregon, this 28 day of OCTOBER, 2010.



BURTON WEAST
CCBA



October 28, 2010

OPUC Chairman Ray Baum
OPUC Commissioner Susan Ackerman
OPUC Commissioner John Savage
Oregon Public Utility Commission
PO Box 2148
Salem OR 97308-2148

RE: LC 48 Comments

Dear Commissioners,

The Clackamas County Business Alliance (CCBA) is an intervener in LC 48. Our Association represents major employers in Clackamas County, and our board has made the closure of the Boardman Power Plan a priority issue.

CCBA strongly supports Portland General Electric's BART III proposal. This proposal is reasonable and balanced in that it considers the costs for our member businesses and all customers that PGE serves. It considers the health of the environment by completely ending emissions in 2020, and it allows time for a new power source to be developed for the customers served by PGE. Lastly, it allows time for the communities surrounding Boardman to transition to new sources of jobs and tax revenue, instead of deepening the economic pit Oregon finds itself in today.

In regard to the recommendations made by staff from the Oregon Public Utility Commission, we offer the following comments:

- The CCBA strongly supports OPUC acknowledgement of PGE's 2020 (BART III) plan for the Boardman Power Plant as part of the Integrated Resource Plan (IRP). Economic, community and environmental interests are all considered in this plan.

- The CCBA opposes closure of the Boardman Power Plant in 2015/2016 and agrees with OPUC staff that the plant should not be shut down in this time frame. Such a closure would jeopardize the reliable power our members need to run their businesses. A 2015/2016 closure does not allow time for the Boardman community to find new jobs or transition their economy. Early closure leaves the customers of PGE vulnerable to the unknown, uncontrollable costs of power on the open market. In this economy, a rise in energy prices or uncertainty in energy sources would be devastating to many of our members, particularly those in the manufacturing business. Manufacturing jobs are extremely valuable to Oregon's economy and should not be unnecessarily risked by state action.

- If the 2020 plan is not approved by the Environmental Quality Commission, we ask that the Commission acknowledges 2040 as PGE's "backstop." This back-up plan is needed as a part of *this* Integrated Resource Plan, to eliminate delay and continued uncertainty for customers and the community.

The Clackamas County Business Alliance appreciates the opportunity to comment on this matter. We appreciate the work that staff has done in recommending a balanced and reasonable path toward the future of Boardman.

Sincerely,

A handwritten signature in black ink, appearing to read "B. Weast", with a large, sweeping initial "B" and a long horizontal stroke extending to the right.

Burton Weast, Executive Director
Clackamas County Business Alliance
300 Oswego Pointe Drive, Suite 220
Lake Oswego, OR 97034