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COUNTY COURT

TERRY K. TALLMAN, Judge
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Boardman, Oregon
LEANN REA, Commissioner
email: lrea@co.morrow.or.us
Boardman, Oregon
KEN GRIEB, Commissioner
email: kgrieb@co.morrow.or.us
Heppner, Oregon

October 27, 2010

OPUC Chairman Ray Baum
OPUC Commissioner Susan Ackerman
OPUC Commissioner John Savage

Dear Commissioners,

As Intervenors in LC 48, Portland General Electric's Integrated Resource Plan, the Morrow County Commission would like provide our comments on the Staff report.

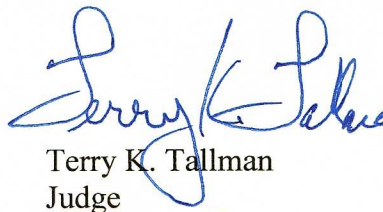
We have been a consistent supporter of PGE's BART III proposal, which seeks to balance the needs of the environment, costs for ratepayers within PGE's service territory and the impacts on our local communities surrounding the Boardman Power Plant. As we have noted in prior comments, and you witnessed at your public hearing on this topic in Boardman, on August 16, there is extremely strong local support for continued operation of this plant. Frankly, many of us would prefer to see it kept online to 2040 and beyond. That said, we recognize that uncertain future regulatory requirements and the need for near-term retrofits to meet new emissions standards are driving PGE to seek an alternative that balances economic and environmental concerns by installing interim controls and then ceasing coal operations at the plant in 2020. We therefore agree with and support Staff's recommendation that the Commission acknowledge PGE BART III as the preferred plan for Boardman.


We also agree with and support Staff's conclusion that the Department of Environmental Quality's proposed 2015/2016 closure option does not provide adequate time to find and acquire reliable replacement resources. We further note that such an early closure would create substantial risk for the state's economy and deliver a devastating blow to the local communities that surround the plant.


Finally, we encourage the Commission to formally acknowledge the 2040 “backstop,” which is the current actionable rule, if a reasonable 2020 plan substantially similar to BART III is not approved by the Environmental Quality Commission. By doing so, the Commission avoids creating additional uncertainty for the economy and for our communities. While Staff has recommended that PGE submit an updated IRP including 2040 if EQC does not adopt a reasonable 2020 Plan, we believe acknowledging a 2040 “backstop” at this stage is appropriate.

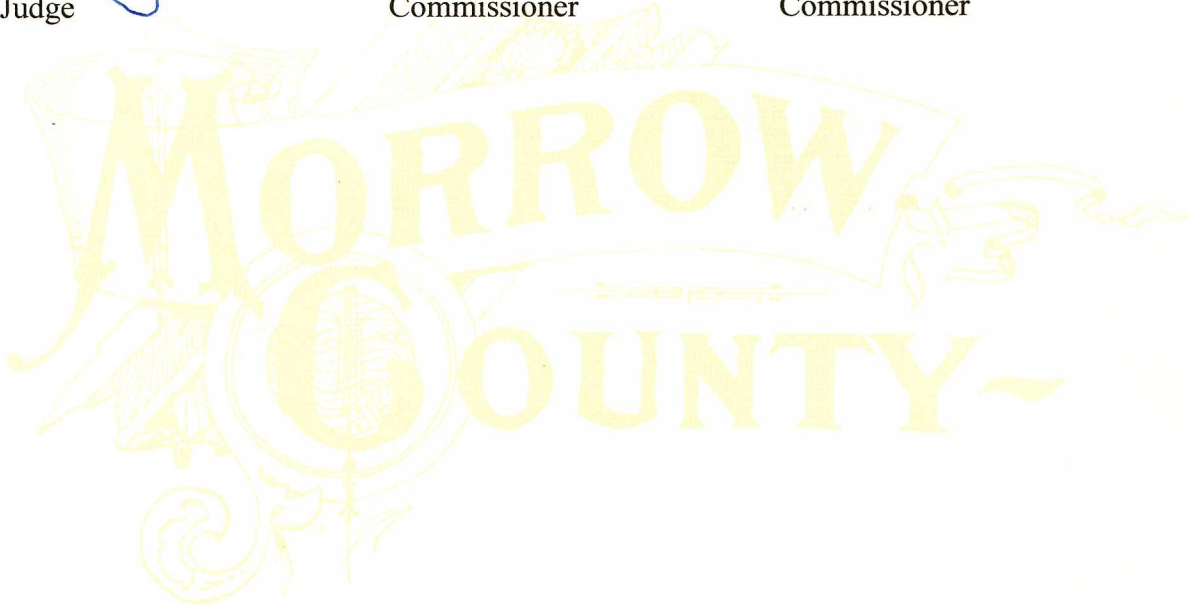
Thank you for the opportunity to comment.

Sincerely,


Terry K. Tallman
Judge


Ken Grieb
Commissioner


Leann Rea
Commissioner





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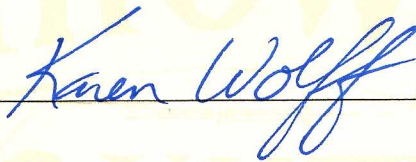
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CERTIFICATE OF SERVICE

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 Heppner, Oregon, this 28th day of October, 2010.



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