



IBEW Local 125

International Brotherhood of Electrical Workers

May 14, 2010

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

Dear Commissioners,

The International Brotherhood of Electrical Workers (IBEW) Local 125 represents approximately 3,600 members who work in the Pacific Northwest's electric utility business. We advocate for the wages, hours, and working conditions of our members. As an intervenor in Portland General Electric's (PGE) Integrated Resource Plan LC 48, we urge the Commission to acknowledge the company's proposal.

IBEW Local 125 knows a balanced energy portfolio is necessary to protect Oregon's interests by providing safe, reasonably priced, and reliable generation, and we believe PGE's plan meets that need. We feel the plan is a compromise and addresses environmental concerns without jeopardizing the company's ratepayers—residential and industrial. All parties must exercise some flexibility and demonstrate a willingness to look at multiple aspects of this complex dynamic situation by focusing on the commonalities. Our preference would be for the Boardman generation facility to operate until 2040 or beyond; however, given the data available in today's climate, we understand the company's position and rationale for proposing the 2020 date. Ultimately, we want to see this same level of passion and involvement focused on PGE investing in research and finding an acceptable fuel source, so the plant can continue operating.

We encourage the Commission to consider the following:

- **Oregon's Workers**—PGE needs time to retrain its workers and make alternative career options available. While some workers could end up at other facilities, there is a potential Boardman could operate using a different fuel method. The company needs time to ascertain the feasibility of such options.

In addition to PGE's workers, we are concerned about those employed in energy-intensive industries as well as small businesses. School districts that continue to face additional layoffs will be challenged even further due to increased energy costs. Increased fuel costs mean employers must find other options to cut costs, which may

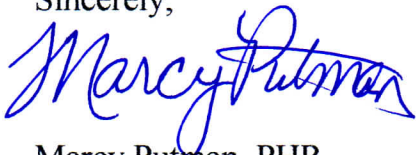
include eliminating or reducing positions. Oregon's economy needs to maintain existing and attract new employers, and the availability of a stable and affordable energy system is a key component.

- **Financial Impact**—PGE's ratepayers should not be presented with \$600 million worth of costs by eliminating coal as a fuel source prior to 2020. The volatility of buying replacement power on the open market could generate many unforeseen expenditures. Likewise, the cost of depreciation at Boardman could increase rates well beyond what many customers can afford.
- **Environmental Issues**— We believe PGE's strategy to minimize Boardman's environmental impact is sound. The company will install pollution controls to address mercury emissions and nitrogen oxides. Lower sulfur coal will be burned. Research and evaluation will continue to find additional ways of mitigating emissions. IBEW Local 125 recognizes the necessity of environmental standards but not at risk of devastating not only the local economies of Morrow, Umatilla, and the surrounding counties but Oregon as a whole.

Oregonians are fierce stewards of the environment, and that stewardship is evident in a variety of ways. During this debate, many have discussed the importance of protecting the sanctity of the Columbia Gorge. Where were these advocates when it came time to debate the logic of altering fertile farmland and eliminating picturesque pastures which sustain Eastern Oregon's economy? For those who live and work in rural Oregon, we know their commitment to sound environmental practices. These are families with deep ties to the land; they understand balance and know how to take care of the environment. We believe they have made tremendous sacrifices through the development of wind farms throughout their region. Should these families give up more by losing a major employer, too?

IBEW Local seeks a reasonable timeframe that will address the needs of 110 full-time employees, 25 contractors, and 225 seasonal maintenance workers. We respectfully request the Commission to acknowledge PGE's 2020 plan and enable the company to move forward. Thank you for your consideration.

Sincerely,

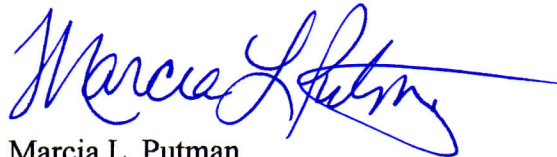


Marcy Putman, PHR
Political Affairs and Communication Representative
IBEW Local 125

CERTIFICATE OF SERVICE

I hereby certify that I have this day caused the attached comments the International Brotherhood of Electrical Workers Local 125 regarding OPUC Docket No. LC 48 -- Portland General Electric's Integrated Resource Plan 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 Portland, Oregon, this 13 day of May, 2010.



Marcia L. Putman
17200 NE Sacramento Street
Portland, OR 97230

SERVICE LIST
OPUC DOCKET # LC 48

Bruce A. Kaser brucekaser@comcast.net (*Waived Paper Service)	Janet L. Prewitt, Asst. Attorney General (C) DEPARTMENT OF JUSTICE Janet.prewitt@doj.state.or.us (*Waived Paper Service)
Kip Pheil, Sr. Policy Analyst (C) OREGON DEPARTMENT OF ENERGY kip.pheil@state.or.us (*Waived Paper Service)	Vijay A. Satyal, Sr. Policy Analyst (C) 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	J. Laurence Cable (C) CABLE HUSTON BENEDICT, ET AL lcable@chbh.com (*Waived Paper Service)
Richard Lorenz (C) CABLE HUSTON BENEDICT, ET AL rlorenz@cablehuston.com (*Waived Paper Service)	Gordon Feighner, Energy Analyst (C) CITIZENS UTILITY BOARD gordon@oregoncbub.org (*Waived Paper Service)
G. Catriona McCracken, Legal Counsel (C) CITIZENS UTILITY BOARD catriona@oregoncbub.org (*Waived Paper Service)	Robert Jenks (C) CITIZENS UTILITY BOARD bob@oregoncbub.org (*Waived Paper Service)
David Tooze, Senior Energy Specialist (C) CITY OF PORTLAND 1900 SW 4 th Avenue, Ste 7100 Portland, OR 97201 dtooze@ci.portland.or.us	Burton Weast, Executive Director CLACKAMAS CO. BUSINESS ALLIANCE burton@ccba.biz (*Waived Paper Service)
Lauren Goldberg (C) COLUMBIA RIVERKEEPER Lauren@columbiariverkeeper.org (*Waived Paper Service)	John DiLorenzo DAVIS WRIGHT TREMAINE LLP johndilorenzo@dwt.com (*Waived Paper Service)
Mark P. Trincherro DAVIS WRIGHT TREMAINE LLP marktrincherro@dwt.com (*Waived Paper Service)	Irion Sanger (C) DAVISON VAN CLEVE 333 SW Taylor, Suite 400 Portland, OR 97204 mail@dvclaw.com
Stephanie S. Andrus, Asst. Attorney General DEPARTMENT OF JUSTICE Stephanie.andrus@state.or.us (*Waived Paper Service)	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 (C) ESLER STEPHENS & BUCKLEY stephens@elserstephens.com (*Waived Paper Service)
Michael Lang (C) 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

<p>Toan-Hao Nguyen IBERDROLA RENEWABLES, INC. 1125 NW Couch St Portland, OR 97209 toan.nguyen@iberdrolausa.com</p>	<p>Marcy Putnam, Political Affairs IBEW LOCAL 125 17200 NE Sacramento Street Portland, OR 97230 marcy@ibew125.com</p>
<p>Michael Early, Director INDUSTRIAL CUSTOMERS OF NW UTILITIES 333 SW Taylor, Suite 400 Portland, OR 97204 mearly@icnu.org</p>	<p>Steven Weiss, Sr. Policy Associate NORTHWEST ENERGY COALITION steve@nwenergy.org (*Waived Paper Service)</p>
<p>Mark Riskedahl NW ENVIRONMENTAL DEFENSE CENTER msr@nedc.org (*Waived Paper Service)</p>	<p>David Zepponi, President NW FOOD PROCESSORS ASSOCIATION 8338 NE Alterwood Road, Ste 160 Portland, OR 97220 pbarrow@nwfp.org</p>
<p>Jane Harrison (C) NW PIPELINE, GP Jane.f.harrison@williams.com (*Waived Paper Service)</p>	<p>Bruce Reemsnyder (C) NW PIPELINE, GP bruce.reemsnyder@williams.com (*Waived Paper Service)</p>
<p>Robert D. Kahn, Executive Director NW INDEPENDENT POWER PRODUCERS rkahn@nippc.org (*Waived Paper Service)</p>	<p>John Bishop OREGON AFL-CIO 1635 NW Johnson Street Portland, OR 97209 jbishop@mbjlaw.com</p>
<p>Kay Teisl OREGON CATTLEMEN'S ASSOCIATION 3415 Commercial St SE, Suite 217 Salem, OR 97302 kayteisl@orcattle.com</p>	<p>Andrea F. Simmons (C) OREGON DEPARTMENT OF ENERGY andrea.f.simmons@state.or.us (*Waived Paper Service)</p>
<p>Jana Gastellum, Program Director, Global Warming OREGON ENVIRONMENTAL COUNCIL janag@oeconline.org (*Waived Paper Service)</p>	<p>Ivan Maluski SIERRA CLUB ivan.maluski@sierraclub.org (*Waived Paper Service)</p>
<p>Aubrey Baldwin, Staff Atty/Clinical Professor (C) PACIFIC ENVIRONMENTAL ADVOCACY CENTER abaldwin@lclark.edu (*Waived Paper Service)</p>	<p>Allison LaPlante (C) PACIFIC ENVIRONMENTAL ADVOCACY CENTER laplante@lclark.edu (*Waived Paper Service)</p>
<p>Jordan A. White, Senior Counsel PACIFIC POWER & LIGHT jordan.white@pacificorp.com (*Waived Paper Service)</p>	<p>Pete Warnken, Manager, IRP PACIFICORP pete.warnken@pacificorp.com (*Waived Paper Service)</p>
<p>Catherine Thomasson, Climate Change Chair PHYSICIANS FOR SOCIAL RESPONSIBILITY, OREGON CHAPTER thomassonc@comcast.net (*Waived Paper Service)</p>	<p>John Prescott, President & CEO PNGC POWER 711 NE Halsey Portland, OR 97232 jprescott@pngcpower.com</p>

<p>Michael Armstrong, Energy Policy (C) CITY OF PORTLAND marmstrong@ci.portland.or.us (*Waived Paper Service)</p>	<p>Benjamin Walters, Deputy City Attorney (C) CITY OF PORTLAND bwalters@ci.portland.or.us (*Waived Paper Service)</p>
<p>Maury Galbraith PUBLIC UTILITY COMMISSION OF OREGON PO Box 2148 Salem, OR 97301 maury.galbraith@state.or.us</p>	<p>Ken Dragoon RENEWABLE NORTHWEST PROJECT ken@rnp.org (*Waived Paper Service)</p>
<p>Gregory Marshall Adams (C) RICHARDSON & O'LEARY P.O. Box 7218 Boise, ID 83702 greg@richardsonandoleary.com</p>	<p>Peter J. Richardson (C) RICHARDSON & O'LEARY P.O. Box 7218 Boise, ID 83702 peter@richardsonandoleary.com</p>
<p>Raymond Burstedt, President SEDCOR 625 High Street NE, Suite 200 Salem, OR 97301 rburstedt@sedcor.com</p>	<p>Gloria D. Smith (C) 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>Patrick G Hager Manager Regulatory Affairs PORTLAND GENERAL ELECTRIC 121 SW Salmon St 1 WTC 0702 Portland, OR 97204 Patrick.Hager@pgn.com</p>
<p>Denise Saunders Assistant General Counsel PORTLAND GENERAL ELECTRIC 121 SW Salmon St 1 WTC 1711 Portland, OR 97204 Denise.Saunders@pgn.com</p>	



IBEW Local 125

International Brotherhood of Electrical Workers

May 14, 2010

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

Dear Commissioners,

The International Brotherhood of Electrical Workers (IBEW) Local 125 represents approximately 3,600 members who work in the Pacific Northwest's electric utility business. We advocate for the wages, hours, and working conditions of our members. As an intervenor in Portland General Electric's (PGE) Integrated Resource Plan LC 48, we urge the Commission to acknowledge the company's proposal.

IBEW Local 125 knows a balanced energy portfolio is necessary to protect Oregon's interests by providing safe, reasonably priced, and reliable generation, and we believe PGE's plan meets that need. We feel the plan is a compromise and addresses environmental concerns without jeopardizing the company's ratepayers—residential and industrial. All parties must exercise some flexibility and demonstrate a willingness to look at multiple aspects of this complex dynamic situation by focusing on the commonalities. Our preference would be for the Boardman generation facility to operate until 2040 or beyond; however, given the data available in today's climate, we understand the company's position and rationale for proposing the 2020 date. Ultimately, we want to see this same level of passion and involvement focused on PGE investing in research and finding an acceptable fuel source, so the plant can continue operating.

We encourage the Commission to consider the following:

- **Oregon's Workers**—PGE needs time to retrain its workers and make alternative career options available. While some workers could end up at other facilities, there is a potential Boardman could operate using a different fuel method. The company needs time to ascertain the feasibility of such options.

In addition to PGE's workers, we are concerned about those employed in energy-intensive industries as well as small businesses. School districts that continue to face additional layoffs will be challenged even further due to increased energy costs. Increased fuel costs mean employers must find other options to cut costs, which may

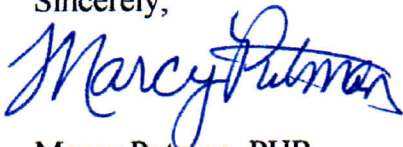
include eliminating or reducing positions. Oregon's economy needs to maintain existing and attract new employers, and the availability of a stable and affordable energy system is a key component.

- **Financial Impact**—PGE's ratepayers should not be presented with \$600 million worth of costs by eliminating coal as a fuel source prior to 2020. The volatility of buying replacement power on the open market could generate many unforeseen expenditures. Likewise, the cost of depreciation at Boardman could increase rates well beyond what many customers can afford.
- **Environmental Issues**— We believe PGE's strategy to minimize Boardman's environmental impact is sound. The company will install pollution controls to address mercury emissions and nitrogen oxides. Lower sulfur coal will be burned. Research and evaluation will continue to find additional ways of mitigating emissions. IBEW Local 125 recognizes the necessity of environmental standards but not at risk of devastating not only the local economies of Morrow, Umatilla, and the surrounding counties but Oregon as a whole.

Oregonians are fierce stewards of the environment, and that stewardship is evident in a variety of ways. During this debate, many have discussed the importance of protecting the sanctity of the Columbia Gorge. Where were these advocates when it came time to debate the logic of altering fertile farmland and eliminating picturesque pastures which sustain Eastern Oregon's economy? For those who live and work in rural Oregon, we know their commitment to sound environmental practices. These are families with deep ties to the land; they understand balance and know how to take care of the environment. We believe they have made tremendous sacrifices through the development of wind farms throughout their region. Should these families give up more by losing a major employer, too?

IBEW Local seeks a reasonable timeframe that will address the needs of 110 full-time employees, 25 contractors, and 225 seasonal maintenance workers. We respectfully request the Commission to acknowledge PGE's 2020 plan and enable the company to move forward. Thank you for your consideration.

Sincerely,



Marcy Putman, PHR
Political Affairs and Communication Representative
IBEW Local 125