

EXECUTIVE COMMITTEE

PRESIDENT AND CHAIR  
JONAE ARMSTRONG  
WASHINGTON SQUARE

VICE PRESIDENT  
MIKE GRANT  
KAISER FOUNDATION  
HEALTH PLAN OF THE NW

SECRETARY  
JACK ORCHARD  
BALL JANIK LLP

TREASURER  
STEVE CLARK  
COMMUNITY NEWSPAPERS

JIM EDWARDS  
BIRTCHEER PROPERTY SERVICES

MATT FELTON  
FELTON PROPERTIES INC

DICK LOFFELMACHER  
PACTRUST

ED TROMPKE  
JORDAN SCHRADER RAMIS PC

DIRECTORS

MORGAN ANDERSON  
INTEL

FRANK ANGELO  
ANGELO PLANNING GROUP

STEVE BARRAGAR  
HARSCH INVESTMENT PROPERTIES

DAVID BENNETT  
LANDYBENNETT BLUMSTEIN LLP

JEFF BORLAUG  
NAI NORRIS BEGGS & SIMPSON

LOIS DITMARS  
PETERKORT TOWNE SQUARE

NORM EDER  
CONKLING FISKUM & MCCORMICK

RICH FOLEY  
IMPQUA BANK

LEX JACKSON  
ROVIDENCE HEALTH & SERVICES

YLE LATTA  
3 INVESTMENT MANAGEMENT LLC

LEX MILLER  
W NATURAL

MIKE MOREY  
ANCORP MORTGAGE INVESTORS LLC

M PARKER  
IE MELVIN MARK COMPANIES

I PETSCHKE  
E, INC.

VE ROBERTSON  
ATLAND GENERAL ELECTRIC

M BRIAN, CHAIRMAN  
SHINGTON COUNTY

OR CRAIG DIRKSEN  
OF TIGARD

OR DENNY DOYLE  
OF BEAVERTON

OR LOU OGDEN  
OF TUALATIN

OR JERRY WILLEY  
OF HILLSBORO

THAN SCHLUETER  
SIDE ECONOMIC ALLIANCE

ADVISING MEMBERS

AST  
N PROPERTIES INC.  
MEYER STORES  
STECH

FOUNDATION  
TH PLAN OF THE NW  
ESTMENT MANAGEMENT LLC  
ELVIN MARK COMPANIES  
SC.  
EST  
AND GENERAL ELECTRIC  
ENCE HEALTH & SERVICES  
NESS PARKS  
WORLD  
ANDARD  
N NORTHWEST  
IGTON SQUARE



✓ October 28, 2010

Oregon Public Utility Commission  
550 Capitol Street NE Suite 215  
Salem, Oregon  
97301-2551

Dear Chairman Ray Baum  
Commissioner Susan Ackerman  
Commissioner John Savage

Subject OPUC Docket LC 48

Westside Economic Alliance represents and serves 150 of our state's leading employers, developers and commercial property managers, as well as nine local communities and ten public service agencies operating on the Westside of the Portland metropolitan region, in areas primarily served by Portland General Electric. As such, WEA has been an early intervener in LC 48, and an outspoken proponent of PGE's Best Available Retrofit Technology (BART III) proposal to suspend operations of the Boardman coal-fired generating facility in 2020.

In previous correspondence and oral testimony to the Commission, WEA has explained how the utility's proposal offers a reasonable balance between protecting the natural environment of our state, with the practical needs of the utility's customers, and the long term interests of the local communities and residents who are closer to the Boardman facility.

In response to the Public Utility Commission staff recommendation, WEA now offers three additional observations:

- 1) We strongly favor the Commission's acknowledgement of PGE's 2020 plan for the Boardman facility as part of their Integrated Resource Plan (IRP), as recommended by your staff. Respecting the competing interests and objectives that must be balanced in order to achieve a workable solution going forward--including economic, environmental, and community needs--the utility's 2020 plan has addressed each of these important goals in a reasoned and prudent manner.
- 2) We also agree with the OPUC staff recommendation that forcing an earlier closure of the Boardman generating facility, whether in 2015 or 2016, is unrealistic and impractical. We remain concerned that earlier closure would unnecessarily disrupt the utility's ability to source replacement power from environmentally responsible sources, in sufficient quantities, assuring reliable supplies, and at reasonable costs. Such demands are simply unreasonable, and don't deserve further consideration by OPUC.

10220 SW Nimbus Avenue, Suite K-12, Tigard, Oregon 97223

Phone: 503-968-3100 □ Fax: 503.624-0641 □ E-mail: westside@westside-alliance.org □ URL: www.westside-alliance.org

Westside Economic Alliance  
October 28, 2010  
OPUC Docket LC 48  
Page Two

- 3) Finally, we support and encourage the Commission to immediately acknowledge a 2040 "backstop" option, which is the current actionable rule, if Oregon's Environmental Quality Commission fails to approve a reasonable 2020 plan substantially similar to BART III. Now, more than ever, customers and communities served by PGE's Boardman facility need clarity and certainty from all state regulatory authorities, regarding the future energy supplies we depend on to power our businesses and live our lives.

We thank the Commission for the opportunity to offer these comments and views, and applaud the work of OPUC staff in recommending a reasonable, balanced approach for continued operation and orderly closure of PGE's Boardman generating facility.

Sincerely,

Jonathan Schlueter  
Executive Director