



P.O. Box 788 • Heppner, Oregon 97836  
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## COUNTY COURT

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

September 1, 2010

The Honorable Gov. Ted Kulongoski  
OPUC Chairman Ray Baum  
OPUC Commissioner Susan Ackerman  
OPUC Commissioner John Savage

Dear Governor and Commissioners,

As Intervenors in LC 48, Portland General Electric's Integrated Resource Plan, the Morrow County Commission would like to reaffirm our strong support for PGE's efforts to obtain regulatory approval for its alternative operating plan for the Boardman Power Plant. We urge the Oregon Public Utility Commission to acknowledge PGE's IRP as amended, including operation of the Boardman Plant through 2020, contingent on approval from the Department of Environmental Quality, and operation through 2040 if an acceptable 2020 control option is not approved.


As you saw and heard in 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.

PGE recently filed a third BART analysis with the Oregon Department of Environmental Quality. We feel that this analysis demonstrates that PGE is making every effort to respond appropriately to the concerns of environmental regulators and incorporate their suggested technology solutions into the Boardman plan within a practical operating framework. We have urged DEQ to work with PGE to adopt a reasonable 2020 plan, recognizing that it would also provide workers at the plant and our community a reasonable timeframe to plan for the transition.


Attached please find, for inclusion in the record of LC 48, a letter we sent to the DEQ August 4 urging them to support PGE's efforts, as well as a similar letter sent August 12 by 27 local officials from Morrow County, together with the Chambers of Commerce of Boardman and Heppner and the Kiwanis Club of Boardman.

Thank you for the opportunity to comment, and thank you again for taking the time to hear directly from Morrow County residents, elected officials, and businesses in Boardman on August 16.

Sincerely,

  
Terry K. Tallman  
Judge

  
Ken Grieb  
Commissioner

  
Leann Rea  
Commissioner



## CERTIFICATE OF SERVICE

I hereby certify that I have this day caused the attached comments of Morrow County regarding OPUC Docket No. 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 at Heppner, Oregon, this 1<sup>st</sup> day of September, 2010.

  
\_\_\_\_\_

**SERVICE LIST**  
**OPUC DOCKET # LC 48**

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## COUNTY COURT

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email: lrea@co.morrow.or.us  
Boardman, Oregon  
KEN GRIEB, Commissioner  
email: kgrieb@co.morrow.or.us  
Heppner, Oregon

August 4, 2010

Mr. Brian Finneran  
Oregon Department of Environmental Quality  
811 SW 6<sup>th</sup> Avenue  
Portland, OR 97204-1390

Dear Mr. Finneran:

As County Commissioners for Morrow County, we are writing to let you know that we want the Oregon Department of Environmental Quality to work with Portland General Electric to develop a workable, reasonable ten-year transition plan for the Boardman Power Plant.

Many of us believe that the best plan for the Boardman Plant would be to install all retrofits necessary to comply with new emissions control standards and continue operating the plant for its planned lifespan, at least through 2040. As you know, that option has already been approved by DEQ, and PGE could implement it with no further rulemaking by your department.

We recognize, however, that there is significant cost involved and a lot of uncertainty around future carbon regulation and other federal emissions standards. With that in mind, PGE's alternative plan to install interim controls and then close the plant or convert it to a non-coal fuel source in 2020 is the best and most realistic way for the state to achieve its environmental goals. It also gives PGE time to develop reliable, cost effective replacement resources. Of crucial importance to our communities, PGE's 2020 plan also gives us a reasonable transition period to cushion the severe economic blow that plant closure will inflict on families, businesses and local government in this region.

We are deeply disappointed by DEQ's decision not to allow PGE's initial 2020 plan to be fully evaluated in the agency's rulemaking process, and we are more than disappointed by the draft options DEQ issued on June 28. It is clear to us that all three of the new options DEQ produced are deeply flawed; they are either much too costly, don't allow enough time to develop replacement resources, rely on unproven technology, or all of the above.

For those reasons we strongly urge DEQ to incorporate PGE's comments and recommendations for a revised 2020 plan into the agency's formal, proposed rule for consideration by the Environmental Quality Commission. It's critical that your proposed rule include a workable 2020 option, and we believe that PGE's recommendations reflect a responsible path to achieve that option.

Sincerely,

Handwritten signatures in blue ink for Terry K. Tallman and Ken Grieb.

Terry K. Tallman  
Judge

Ken Grieb  
Commissioner

Handwritten signature in blue ink for Leann Rea.

Leann Rea  
Commissioner



August 12, 2010

Mr. Brian Finneran  
Oregon Department of Environmental Quality  
811 SW 6<sup>th</sup> Avenue  
Portland, OR 97204-1390

Dear Mr. Finneran:

As residents, businesses and business associations, local elected officials and community supporters of the Boardman area and Morrow and Umatilla counties, we are writing to let you know that we want the Oregon Department of Environmental Quality to work with Portland General Electric to develop a workable, reasonable ten-year transition plan for the Boardman Power Plant.

Many of us believe that the best plan for the Boardman Plant would be to install all retrofits necessary to comply with new emissions control standards and continue operating the plant for its planned lifespan, at least through 2040. As you know, that option has already been approved by DEQ, and PGE could implement it with no further rulemaking by your department.

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For those reasons we strongly urge DEQ to incorporate PGE's comments and recommendations for a revised 2020 plan into the agency's formal, proposed rule for consideration by the Environmental Quality Commission. It's critical that your proposed rule include a workable 2020 option, and we believe that PGE's recommendations reflect a responsible path to achieve that option.

Sincerely,

Chet Phillips, Mayor  
City of Boardman

Marvin Padberg, President  
Port of Morrow Commission

Jerry Healy  
Port of Morrow Commission

Larry Lindsay  
Port of Morrow Commission

Randy Yates, Council President  
City of Boardman

Steve Doherty, Councilor  
City of Boardman

Jill Pambrun, Councilor  
City of Boardman

Karen Pettigrew, City Manager  
City of Boardman

Cindy Doherty, Councilor  
City of Heppner

John Bowles, Councilor  
City of Heppner

Keith Lewis, Councilor  
City of Heppner

David DeMayo, City Manager  
City of Heppner

Scott Pingel, City Manager  
City of Stanfield

Daye Stone, Principle  
Morrow County School District

Kiwanis Club of Boardman

W. Lawrence Givens, Commissioner  
Umatilla County

Don Russell  
Port of Morrow Commission

Joe Taylor  
Port of Morrow Commission

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Port of Morrow

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City of Boardman

Jerry Johnson, Councilor  
City of Boardman

LaVern Gertlar, Councilor  
City of Boardman

Les Paustian, Mayor  
City of Heppner

Joann Burleson, Councilor  
City of Heppner

Judy Buschke, Councilor  
City of Heppner

Samama Van Doom, Councilor  
City of Heppner

Thomas McCann, Mayor  
City of Stanfield

Mark Burrows, Superintendent  
Morrow County School District

Heppner Chamber of Commerce

Boardman Chamber of Commerce

Community Action Program of East Central Oregon (CAPECO) & Workforce  
Development

Willow Creek Valley Economic Development

Tim Dickensen  
Dickensen Chiropractic Clinic

Jerald & Leann Rea

Bank of Eastern Oregon

Dale & Sheryll Bates

Father Jerry Condon  
St. Patrick's Catholic Church

Betty Gray

Alvina Padberg

Dino's Delectable Catering Services

ICABO Grow Ione, Inc.

John Edmundson

Jeff & Christine Bailey

Dick & Nancy Snider

Ed Rollins

Mountain Valley Land Company

Joe and Jo Anne Burleson

Nikki Coe

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Heppner Video Store

John's Other Place

David & April Sykes

Les & Janice Paustian

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