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November 30, 2009

***VIA ELECTRONIC FILING  
AND FIRST CLASS MAIL***

Public Utility Commission of Oregon  
Attn: Filing Center  
550 Capitol Street NE, Suite 215  
PO Box 2148  
Salem, Oregon 97308-2148

Re: DOCKET LC 48: Portland General Electric 2009 Integrated Resource Plan

Notice of Intent to Request an Issue Fund Grant of Sierra Club, Columbia Riverkeeper, Friends of Columbia Gorge, and Northwest Environmental Defense Center and waiver of paper service

Enclosed for filing are an original and one copy of Sierra Club, Columbia Riverkeeper, Friends of the Columbia Gorge and Northwest Environmental Defense Center's Notice of Intent to Request an Issue Fund Grant in the above-referenced docket. A copy of this filing was served on all parties as indicated on the attached certificate of service.

Please contact me if you have any questions.

Sincerely,

Aubrey Baldwin  
Counsel for Petitioners

enclosures

cc: Service List for Docket No. LC 48

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**LC 48**

In the Matter of	)	SIERRA CLUB, COLUMBIA
	)	RIVERKEEPER, FRIENDS OF
PORTLAND GENERAL ELECTRIC	)	THE COLUMBIA GORGE, AND
	)	NORTHWEST ENVIRONMENTAL
2009 Integrated Resource Plan	)	DEFENSE CENTER'S NOTICE OF
	)	INTENT TO REQUEST AN ISSUE FUND
	)	GRANT

Pursuant to OAR § 860-012-0100 and Section 6.2 of the First Amended and Restated Intervenor Funding Agreement (“IFA”), Sierra Club, Columbia Riverkeeper, Friends of Columbia Gorge and Northwest Environmental Defense Center (“Petitioners”) hereby file this Notice of Intent to Request an Issue Fund Grant in the above-captioned docket, LC 48. Petitioners submit this Notice of Intent to notify the Oregon Public Utilities Commission (“Commission”), precertified organizations and intervenors in LC 48, that Petitioners will request intervenor funding for this proceeding.

1. On November 5, 2009, Portland General Electric (“PGE”) submitted its 2009 IRP with the Commission. This filing has been docketed by the Commission as LC 48.

2. LC 48 is an Eligible Proceeding under the IFA. Article 1(c) of the IFA defines an "Eligible Proceeding" as "any commission proceeding that directly affects one or more of the Participating Public Utilities." IFA Section 1(c). Docket No. LC 48 will directly affect PGE. PGE is a Participating Public Utility under Section 1(k) of the IFA. Therefore, LC 48 is an Eligible Proceeding for which an Issue Fund Grant may be made pursuant to Section 6.1 of the IFA.

3. As required by Section 6.2 of the IFA, this Notice of Intent is being filed at the time Petitioners are requesting intervention in LC 48.

4. As required by Section 6.2, this Notice of Intent is being served on each affected Participating Public Utility, all precertified organizations, and all parties identified on the service list for LC 48.

5. Petitioners identify the PGE Issue Fund as the account from which Petitioners intend to request an Issue Fund Grant.

6. Petitioners request that the Commission establish a deadline by which Petitioners must file a proposed budget with respect to the Issue Fund Grant, as provided in Section 6.3 of the IFA.

DATED this 30th day of November 2009.

Attorney for Petitioners:

*/s/ Aubrey Baldwin*

Aubrey Baldwin, OSB No. 060414  
Pacific Environmental Advocacy Center  
10015 SW Terwilliger Blvd.  
Portland, Oregon 97219  
503.768.6929 phone  
503.768.6642 fax  
[abaldwin@lclark.edu](mailto:abaldwin@lclark.edu)

**Certificate of Service**

I certify that I have this day served the foregoing Petition to Intervene upon all parties of record in LC 48 by delivering a copy by electronic mail or by U.S. Mail to all parties as indicated on the service list compiled by the OPUC.

Dated this 30th day of November 2009.

Attorney for Petitioners:

/s/ Aubrey Baldwin

Aubrey Baldwin, OSB No. 060414  
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**LC 48 Service List**

<p><b>Portland General Electric</b>                  PATRICK G. HAGER                  MANAGER - REGULATORY AFFAIRS                  121 S.W. Salmon, 1WTC0702                  PORTLAND OR 97204                  Patrick.hager@pgn.com</p>	<p><b>Portland General Electric</b>                  DENISE SAUNDERS                  ASST GENERAL COUNSEL                  121 SW Salmon 1WTC1711                  PORTLAND OR 97204                  Denise.saunders@pgn.com</p>
<p><b>Northwest Independent Power Producers (W)</b>                  ROBERT D. KAHN, EXECUTIVE DIRECTOR                  1117 Minor Ave, Suite 300                  Seattle, WA 98101                  rkahn@nippc.org</p>	<p>SUSAN ACKERMAN (W)                  621 SW Morrison, Suite 700                  Portland, OR 97205                  Susan.k.ackerman@comcast.net</p>

<p><b>Northwest Energy Coalition (W)</b>  STEVEN WEISS  SR POLICY ASSOCIATE  4422 Oregon Trail Ct. NE  Salem, OR 97305  steve@nwenergy.org</p>	<p><b>Ecumenical Ministries of Oregon (W)</b>  JENNY HOLMES  ENVTL MINISTRIES DIRECTOR  0245 SW Bancroft, Suite B  Portland, OR 97239  jholmes@emoregon.org</p>
<p><b>Ecumenical Ministries of Oregon (W)</b>  JAMES EDELSON  415 NE Mirimar Pl  Portland, OR 97232  Edelson8@comcast.net</p>	<p><b>Oregon Department of Justice</b>  STEPHANIE ANDRUS  ASST ATTORNEY GENERAL  Regulated Utility &amp; Business Section  1162 Court St NE  Salem, OR 97301-4096  Stephanie.andrus@state.or.us</p>
<p><b>Citizen's Utility Board of Oregon (W)</b>  ROBERT JENKS  610 SW BROADWAY STE 308  PORTLAND OR 97205  bob@oregoncub.org</p>	<p><b>Citizen's Utility Board of Oregon (W)</b>  GORDON FEIGHNER  610 SW BROADWAY, SUITE 308  PORTLAND OR 97205  gordon@oregoncub.org</p>
<p><b>Citizen's Utility Board of Oregon (W)</b>  G. CATRIONA MCCRACKEN  610 SW BROADWAY - STE 308  PORTLAND OR 97205  catriona@oregoncub.org</p>	
<p><b>PACIFIC POWER &amp; LIGHT (W)</b>  JORDAN A WHITE  SENIOR COUNSEL  825 NE MULTNOMAH STE 1800  PORTLAND OR 97232  jordan.white@pacificorp.com</p>	<p><b>PACIFICORP (W)</b>  PETE WARNKEN  MANAGER, IRP  825 NE MULTNOMAH - STE 600  PORTLAND OR 97232  pete.warnken@pacificorp.com</p>
<p><b>PACIFICORP, DBA PACIFIC POWER (W)</b>  PACIFIC POWER OREGON DOCKETS  825 NE MULTNOMAH STREET, STE 2000  PORTLAND OR 97232  oregondockets@pacificorp.com</p>	<p><b>OREGON ENVIRONMENTAL COUNCIL (W)</b>  SALLIE SCHULLINGER-KRAUSE  222 NW DAVIS ST., SUITE 309  PORTLAND, OR 97209  sallies@oeconline.org</p>