

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

Re: In the matter of Portland General Electric Company 2009 Integrated Resource Plan
Docket No. LC 48

Enclosed are an original and a copy of Oregon Farm Bureau Federation's Motion to Intervene Out of Time and Petition to Intervene in the above captioned matter. In addition, we are enclosing our comments to the Public Utility Commission of Oregon on Docket No. LC 48.

Sincerely,

A handwritten signature in black ink that reads "Katie Fast". The signature is written in a cursive, flowing style.

Katie Fast

Director of Government Affairs

BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

LC 48

In the matter of Portland General)	
Electric Company 2009)	MOTION TO INTERVENE
Integrated Resource Plan filing)	OUT OF TIME
)	
_____)	

The Oregon Farm Bureau Federation hereby moves to for permission to intervene out of time. Oregon Farm Bureau Federation's Petition to Intervene is attached to this Motion.

Granting this petition for late intervention will not broaden the issues, burden the record or unreasonably delay the proceeding nor prejudice the rights of other parties to the proceeding.

Oregon Farm Bureau Federation will be commenting on Portland General Electric Company's Boardman 2020 Plan portion of the 2009 Integrated Resource Plan filing, an existing issue. As a Portland General Electric Company customer, we have an interest in ensuring that the Boardman 2020 Plan receives a thorough and complete vetting.

Dated: May 18, 2010



Representative of Oregon Farm Bureau Federation

BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

LC 48

In the matter of Portland General)	
Electric Company 2009)	PETITION TO INTERVENE
Integrated Resource Plan filing)	
)	
_____)	

NAME OF PETITIONER: Oregon Farm Bureau Federation

ADDRESS: 3415 Commercial St SE, Salem, OR 97302

PHONE NUMBER: 503-399-1701

FAX NUMBER: 503-399-8082

E-MAIL ADDRESS: katie@oregonfb.org

PLEASE SEND COPIES TO: Katie Fast, Director of Government Affairs

IF THE PETITIONER IS AN ORGANIZATION, THE NUMBER OF MEMBERS IN AND THE PURPOSES OF THE ORGANIZATION: 54,000 members
The organization's primary purpose is to support the continuation of agricultural and related industries, and prosperity for Oregon farmers and ranchers.

NATURE AND EXTENT OF THE PETITIONER'S INTEREST IN THE PROCEEDING:

Oregon Farm Bureau Federation will be commenting on Portland General Electric Company's Boardman 2020 Plan portion of the 2009 Integrated Resource Plan filing, an existing issue. As Oregon's largest general agriculture organization a significant number of our members operate in PGE's service area, we have an interest in ensuring that the Boardman 2020 Plan receives a thorough and complete vetting and in ensuring that our comments are given appropriate consideration in the official record of the proceeding.
THE ISSUES THE PETITIONER INTENDS TO RAISE AT THE PROCEEDING:

None specifically. However, our comments will not broaden the issues, burden the record, or unreasonably delay the proceeding.

ANY SPECIAL KNOWLEDGE OR EXPERTISE OF THE PETITIONER THAT WOULD ASSIST THE COMMISSION IN RESOLVING THE ISSUES IN THE PROCEEDING:

None specifically.

Based on the information provided above in accordance with the Commission's rules of procedure, I request to participate in this proceeding as an intervenor. I, or the organization that I represent, will not unreasonably broaden the issues, burden the record, or unreasonably delay the proceeding. OAR 860-013-0021.

Pursuant to OAR 860-013-0070 (4), Petitioner hereby agrees to accept service by electronic mail and waives other forms of service provided in OAR 860-013-0073.


Kati Just
Petitioner or representative

5/18/10
Date

CERTIFICATE OF SERVICE

I hereby certify that I have this day caused the foregoing **MOTION TO INTERVENE OUT OF TIME** and **PETITION TO INTERVENE** 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: May 18, 2010



Signed



Oregon Farm Bureau 3415 Commercial Street SE Salem, OR 97302 (503) 399-1701 www.oregonfb.org

May 18, 2010

Public Utility Commission
Attn: Filing Center
550 Capitol Street NE #215
PO Box 2148
Salem, OR 97308

Re: Portland General Electric Company 2009 Integrated Resource Plan Docket No. LC 48

Dear Commissioners,

As an intervenor in Portland General Electric's (PGE) Integrated Resource Plan (LC 48), Oregon Farm Bureau Federation (OFBF), the state's largest general agriculture organization, would like to express our support for PGE's 2020 plan for its Boardman Coal Plant. OFBF strongly urges the Oregon Public Utility Commission to provide the necessary acknowledgements required for PGE to legally pursue its 2020 plan for the Boardman Plant, or the alternative plan to install more extensive emission controls to keep the plant operating until 2040 as set forth in its revised IRP.

OFBF is a grassroots, nonprofit organization representing the interests of the state's farmers and ranchers in the public and policymaking arenas. As Oregon's largest general farm organization, our primary goal is to promote educational improvement, economic opportunity, and social advancement for its members and the farming, ranching, and natural resources industry as a whole. Today, OFB has about 54,000 members, with about 8,000 of these being professionally engaged in agriculture

Our organization is weighing in on this important matter because of the potential impact on the agricultural business here in the state. The cost of farming continues to rise, and the margins for our farmers are becoming thinner and thinner. Electricity is an important input used to run irrigation equipment, heat greenhouses, operate refrigeration units and other mechanisms used to produce, store and process our crops. It is critical we not effectively price farmers out of the market by causing sudden rate increases, as might happen with a rapid 2014 shutdown of Boardman.

While the farm community, like others, supports moving toward more renewables, our primary concern is with placing too much emphasis on renewables, while not accessing their cost-benefit ratio. However, in making your decision, we urge you to leave room for future

consideration of bio-fuels as a possible generation fuel source in acknowledging the Boardman 2020 plan.

The Boardman 2020 plan provides a balanced approach that includes an immediate and significant reduction in emissions from Boardman and a 10-year strategy for closing the plant and transitioning to new generation resources. It strikes the correct balance between environmental and economic concerns, and it is in the interest of farm businesses and all Oregonians to see this plan move forward.

We thank you for your consideration of our position on this important matter.

Sincerely,

A handwritten signature in black ink that reads "Katie Fast". The signature is written in a cursive, flowing style.

Katie Fast
Director of Government Affairs

May 19, 2010

Re: Oregon Farm Bureau Federation's notice to intervene in Portland General Electric Company 2009 Integrated Resource Plan Docket No. LC 48

The following individuals and entities were notified of Oregon Farm Bureau Federation's Motion to Intervene Out of Time and Petition to Intervene in the above captioned matter.

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