

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**LC 48**

In the Matter of	)	
	)	PETITION TO INTERVENE &
PORTLAND GENERAL ELECTRIC	)	WAIVER OF PAPER SERVICE OF
COMPANY,	)	TURLOCK IRRIGATION DISTRICT
	)	
2009 Integrated Resource Plan.	)	
	)	

Pursuant to ORS 774.180 and OAR § 860-012-0001, the Turlock Irrigation District (“TID”) hereby submits this Petition to Intervene and Waiver of Paper Service in the above-captioned proceeding. In support of this Petition, TID states as follows:

1. The name and address of Petitioner as a party of record in this proceeding is:

Larry W. Weiss, General Manager  
Randy C. Baysinger, Assistant General Manager  
Turlock Irrigation District  
333 East Canal  
PO Box 949  
Turlock, CA 95381-0949  
[rcbaysinger@tid.org](mailto:rcbaysinger@tid.org)

2. Larry Cable and Richard Lorenz of Cable Huston Benedict Haagensen & Lloyd, LLP will represent TID in this proceeding. All documents related to this proceeding should be served on TID’s attorneys at the following address:

Larry Cable  
Richard Lorenz  
Cable Huston Benedict Haagensen & Lloyd LLP  
1001 SW Fifth Ave., Suite 2000  
Portland, OR 97204-1136  
Telephone: (503) 224-3092  
Facsimile: (503) 224-3176  
[lcable@cablehuston.com](mailto:lcable@cablehuston.com)  
[rlorenz@cablehuston.com](mailto:rlorenz@cablehuston.com)

3. TID is a consumer-owned utility with headquarters in Turlock, California. TID provides safe, affordable and reliable electricity to a growing retail customer base that now numbers in excess of 98,000 residential, farm, business, industrial and municipal accounts in an electric service area that encompasses 662 square-miles in portions of Stanislaus, Merced, Tuolumne and Mariposa counties.

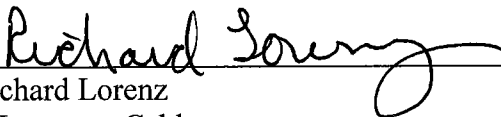
4. In 1993, TID entered into a long-term power purchase agreement (“PPA”) with what is now known as the Power Resources Cooperative (“PRC”). PRC is a 10% owner of the Boardman coal plant, of which Portland General Electric (“PGE”) is both the majority owner and the operator. Pursuant to the terms of the PPA, PRC assigned to TID until December 31, 2018, PRC’s right to schedule and receive its ownership share of the power output from Boardman. TID has a direct interest in PGE’s Integrated Resource Plan to the extent that it addresses the future operation of Boardman.

5. TID has information that will likely be helpful to the Commission concerning PGE’s maintenance and operation of Boardman as well as differing economic perspectives from those advanced by PGE in regard to Boardman, assessments of the requirements of putting Boardman into compliance with applicable environmental laws and practical experience related to the difficulties and probable additional costs of attempting to install the proposed facilities at Boardman. TID’s participation in this proceeding will not unreasonably broaden the issues, burden the record, nor delay the proceeding.

WHEREFORE, TID respectfully requests leave to intervene and requests all the rights of a party in this proceeding.

DATED this 21<sup>st</sup> day of December, 2009.

Respectfully submitted,

  
Richard Lorenz  
J. Laurence Cable  
Cable Huston Benedict Haagensen & Lloyd LLP  
1001 SW Fifth Ave., Suite 2000  
Portland, OR 97204-1136  
Telephone: (503) 224-3092  
Facsimile: (503) 224-3176  
E-Mail: [rlorenz@cablehuston.com](mailto:rlorenz@cablehuston.com)  
[lcable@cablehuston.com](mailto:lcable@cablehuston.com)

Of Attorneys for  
Turlock Irrigation District

**CERTIFICATE OF SERVICE**

I CERTIFY that I have on this day served the foregoing document **TURLOCK IRRIGATION DISTRICT'S PETITION TO INTERVENE & WAIVER OF PAPER SERVICE** on all parties of the record listed on the Service list below, in this proceeding via electronic mail and/or via mailing a copy properly addressed with first class postage prepaid.

**LC-48 OFFICIAL SERVICE LIST**

SUSAN K ACKERMAN (W)  
ATTORNEY  
621 SW MORRISON, SUITE 700  
PORTLAND OR 97205  
[susan.k.ackerman@comcast.net](mailto:susan.k.ackerman@comcast.net)

GORDON FEIGHNER  
ENERGY ANALYST  
**CITIZENS' UTILITY BOARD OF OREGON**  
610 SW BROADWAY, SUITE 308  
PORTLAND OR 97205  
[gordon@oregoncub.org](mailto:gordon@oregoncub.org)

ROBERT JENKS  
**CITIZENS' UTILITY BOARD OF OREGON**  
610 SW BROADWAY, SUITE 308  
PORTLAND OR 97205  
[bob@oregoncub.org](mailto:bob@oregoncub.org)

G. CATRIONA MCCRACKEN  
LEGAL COUNSEL/STAFF ATTY  
**CITIZENS' UTILITY BOARD OF OREGON**  
610 SW BROADWAY, SUITE 308  
PORTLAND OR 97205  
[catriona@oregoncub.org](mailto:catriona@oregoncub.org)

STEPHANIE S ANDRUS (C)  
ASSISTANT ATTORNEY GENERAL  
**DEPARTMENT OF JUSTICE**  
REGULATED UTILITY & BUSINESS SECTION  
1162 COURT ST NE  
SALEM OR 97301-4096  
[stephanie.andrus@state.or.us](mailto:stephanie.andrus@state.or.us)

ROBERT D KAHN  
EXECUTIVE DIRECTOR  
**NW INDEPENDENT POWER PRODUCERS**  
1117 MINOR AVENUE, SUITE 300  
SEATTLE WA 98101  
[rkahn@nippc.org](mailto:rkahn@nippc.org)

MICHAEL ARMSTRONG  
**ENERGY POLICY / GLOBAL WARMING**  
721 NW 9TH AVE -- SUITE 350  
PORTLAND OR 97209-3447  
[marmstrong@ci.portland.or.us](mailto:marmstrong@ci.portland.or.us)

KEN DRAGOON  
**RENEWABLE PROJECT NORTHWEST**  
917 SW OAK, SUITE 303  
PORTLAND, OR 97205  
[Ken@rnp.org](mailto:Ken@rnp.org)

AUBREY BALDWIN (C)  
**PORTLAND CITY OF - ENERGY OFFICE**  
STAFF ATTORNEY/CLINICAL PROFESSOR  
10015 SW TERWILLIGER BLVD  
PORTLAND OR 97219  
[abaldwin@lclark.edu](mailto:abaldwin@lclark.edu)

ANN ENGLISH GRAVATT  
**RENEWABLE NORTHWEST PROJECT**  
917 SW OAK STREET, SUITE 303  
PORTLAND, OR 97205  
[ann@rnp.org](mailto:ann@rnp.org)

JAMES EDELSON  
**ECUMENICAL MINISTRIES OF OREGON**  
415 NE MIRIMAR PLACE  
PORTLAND, OR 97232  
[Edelson8@comcast.net](mailto:Edelson8@comcast.net)

JANE HARRISON  
**NORTHWEST PIPELINE GP**  
MGR – MARKETING SERVICES  
295 CHIPETA WAY  
SALT LAKE CITY, UT 84158  
[Jane.f.harrison@williams.com](mailto:Jane.f.harrison@williams.com)

DOUG HOWELL  
**SIERRA CLUB**  
180 NICKERSON STREET, SUITE 202  
SEATTLE, WA 98109  
[Doug.howell@sierraclub.org](mailto:Doug.howell@sierraclub.org)

ALLISON LAPLANTE  
**PACIFIC ENVIRONMENTAL ADVOCACY  
CENTER**  
10015 SW TERWILLIGER BLVD  
PORTLAND, OR 97219  
[laplante@lclark.edu](mailto:laplante@lclark.edu)

KIP PHEIL  
SENIOR POLICY ANALYST  
**OREGON DEPARTMENT OF ENERGY**  
625 MARION ST NE, SUITE 1  
SALEM, OR 97301  
[Kip.pheil@state.or.us](mailto:Kip.pheil@state.or.us)

JANET L. PREWITT  
**DEPARTMENT OF JUSTICE**  
NATURAL RESOURCES SECTION  
1162 COURT STREET, NE  
SALEM, OR 97301-4096  
[Janet.prewitt@doj.state.or.us](mailto:Janet.prewitt@doj.state.or.us)

VIJAY A. SATYAL  
**OREGON DEPARTMENT OF ENERGY**  
625 MARION STREET, NE  
SALEM, OR 97301  
[Vijay.a.satyal@state.or.us](mailto:Vijay.a.satyal@state.or.us)

LAUREN GOLDBERG  
**COLUMBIA RIVERKEEPER**  
724 OAK STREET  
HOOD RIVER, OR 97031  
[Lauren@columbiariverkeeper.org](mailto:Lauren@columbiariverkeeper.org)

JENNY HOLMES  
ENVIRONMENTAL MINISTRIES DIRECTOR  
**ECUMENICAL MINISTRIES OF OREGON**  
0245 SW BANCROFT, SUITE b  
PORTLAND, OR 97239  
[jholmes@emoregon.org](mailto:jholmes@emoregon.org)

MICHAEL LANG  
**FRIENDS OF COLUMBIA GORGE**  
522 SW FIFTH AVENUE, SUITE 720  
PORTLAND, OR 97204  
[Michael@gorgefriends.org](mailto:Michael@gorgefriends.org)

**PACIFICORP, DBA PACIFIC POWER**  
825 NE MULTNOMAH STREET, STE. 2000  
PORTLAND, OR 97232  
[oregondockets@pacificorp.com](mailto:oregondockets@pacificorp.com)

AMY POTTER  
**NORTHWEST PIPELINE GP**  
295 CHIPETA WAY  
SALT LAKE CITY, UT 84108  
[Amy.potter@williams.com](mailto:Amy.potter@williams.com)

MARK RISKEDAHL  
**NORTHWEST ENVIRONMENTAL DEFENSE  
CENTER**  
10015 SW TERWILLIGER BLVD  
PORTLAND, OR 97219  
[mrs@nedc.org](mailto:mrs@nedc.org)

SALLIE SCHULLINGER-KRAUS  
**OREGON ENVIRONMENTAL COUNSEL**  
222 NW DAVIS ST, SUITE 309  
PORTLAND, OR 97209  
[sallies@oeconline.org](mailto:sallies@oeconline.org)

GLORIA D. SMITH  
**SIERRA CLUB LAW PROGRAM**  
85 SECOND STREET  
SAN FRANCISCO, CA 94105  
[Gloria.smith@sierraclub.org](mailto:Gloria.smith@sierraclub.org)

CATHERINE THOMASSON  
CLIMATE CHANGE CHAIR  
**PHYSICIANS FOR SOCIAL  
RESPONSIBILITY – OREGON CHAPTER**  
1227 NE 27<sup>TH</sup>, #5  
PORTLAND, OR 97232  
[tomassonc@comcast.net](mailto:tomassonc@comcast.net)

PETE WARNKEN  
MANAGER, IRP  
**PACIFICORP**  
825 NE MULTNOMAH – SUITE 600  
PORTLAND, OR 97232  
[Pete.warnken@pacificorp.com](mailto:Pete.warnken@pacificorp.com)

JORDAN A. WHITE  
SENIOR COUNSEL  
**PACIFIC POWER & LIGHT**  
825 NE MULTNOMAH, STE. 1800  
PORTLAND, OR 97232  
[Jordan.white@pacificorp.com](mailto:Jordan.white@pacificorp.com)

PATRICK G HAGER (via U.S. Mail)  
MANAGER - REGULATORY AFFAIRS  
**PORTLAND GENERAL ELECTRIC**  
121 SW SALMON ST 1WTC0702  
PORTLAND OR 97204  
[patrick.hager@pgn.com](mailto:patrick.hager@pgn.com)

MICHAEL EARLY (via U.S. Mail)  
**INDUSTRIAL CUSTOMERS OF  
NORTHWEST UTILITIES**  
333 SW TAYLOR STREET, SUITE 400  
PORTLAND, OR 97204  
[mearly@icnu.org](mailto:mearly@icnu.org)

KEVIN LYNCH (via U.S. Mail)  
**IBERDROLA RENEWABLES, INC.**  
1125 NW COUCH STREET, SUITE 700  
PORTLAND, OR 97209  
[Kevin.lynch@iberdrolausa.com](mailto:Kevin.lynch@iberdrolausa.com)

JOHN W. STEPHENS  
**ESLER STEPHENS & BUCKLEY**  
888 SW FIFTH AVENUE, SUITE 700  
PORTLAND, OREGON 97204-2021  
[stephens@eslerstephens.com](mailto:stephens@eslerstephens.com)

BENJAMIN WALTERS  
**PORTLAND OFFICE OF CITY ATTORNEY**  
1221 SW 4<sup>TH</sup> AVENUE, TOOM 430  
PORTLAND, OR 97204  
[bwalters@ci.portland.or.us](mailto:bwalters@ci.portland.or.us)

STEVEN WEISS  
**NORTHWEST ENERGY COALITION**  
4422 OREGON TRAIL COURT, NE  
SALEM, OR 97035  
[steve@nwenergy.org](mailto:steve@nwenergy.org)

DENISE SAUNDERS (via U.S. Mail)  
ASST GENERAL COUNSEL  
**PORTLAND GENERAL ELECTRIC**  
121 SW SALMON ST - 1WTC1711  
PORTLAND OR 97204  
[denise.saunders@pgn.com](mailto:denise.saunders@pgn.com)

TOAN-HAO NGUYEN (via U.S. Mail)  
**IBERDROLA RENEWABLES, INC.**  
1125 NW COUCH STREET  
PORTLAND, OR 97209  
[toan.nguyen@iberdrolausa.com](mailto:toan.nguyen@iberdrolausa.com)

IRION A. SANGER (via U.S. Mail)  
**DAVISON VAN CLEVE**  
333 SW TAYLOR, SUITE 400  
PORTLAND, OR 97204  
[las@dvclaw.com](mailto:las@dvclaw.com)

Dated in Portland, Oregon, this 21<sup>st</sup> day of December, 2009.

  
Richard Lorenz  
Cable Huston Benedict Haagensen & Lloyd LLP  
1001 SW Fifth Ave., Suite 2000  
Portland, OR 97204-1136  
Telephone: (503) 224-3092  
Facsimile: (503) 224-3176  
E-Mail: [rlorenz@cablehuston.com](mailto:rlorenz@cablehuston.com)

Of Attorneys for  
Turlock Irrigation District