

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**LC 48**

In the Matter of	)	PETITION OF CITY OF
PORTLAND GENERAL ELECTRIC CO.,	)	PORTLAND TO INTERVENE
2009 Integrated Resource Plan.	)	AS A PARTY

Pursuant to ORS 756.525 and OAR 860-013-0021, the City of Portland respectfully petitions the Commission for leave to intervene as a party in this proceeding on the following grounds:

1. The City of Portland is a municipal corporation duly organized and existing under the laws of the State of Oregon.

2. The business address for the City of Portland for the purposes of its participation in this proceeding is:

Michael Armstrong  
Senior Sustainability Manager  
David Tooze, Policy Analyst  
Bureau of Planning and Sustainability  
City of Portland  
1900 SW 4<sup>th</sup> Avenue  
7<sup>th</sup> Floor, Suite 7100  
Portland, OR 97201-5380  
Fax: 503-823-7800  
e-mail: [marmstrong@ci.portland.or.us](mailto:marmstrong@ci.portland.or.us)

3. Correspondence and service of papers related to this proceeding should be on the City's counsel:

Benjamin Walters  
Deputy City Attorney  
Office of City Attorney  
1220 S.W. 5th Avenue, Room 315  
Portland, OR 97204  
Fax: 503-823-3089  
e-mail: [bwalters@ci.portland.or.us](mailto:bwalters@ci.portland.or.us)

4. PGE's 2009 Integrated Resource Plan (2009 IRP) details the company's plan for meeting its customers' demand for electricity, including carbon-intensive sources for meeting electricity demand.

5. The Portland City Council has adopted a 2009 Climate Action Plan establishing a goal of reducing carbon emissions by 40 percent from 1990 levels by 2030.

6. Participation as a party in the Commission's review of PGE's proposed 2009 IRP would permit the City to review detailed information on the utility's plans to address customers' demands, be actively involved in analyzing options for reducing carbon emissions in serving this demand, and be actively involved in advocating for the benefit of Portland ratepayers and citizens.

7. The City is one of PGE's larger customers, with a significant number of accounts and annual utility billings. As a corporate customer and local government body, the City has an obligation to balance the goals of striving for economical electricity rates, addressing global climate concerns and maintaining diverse and sustainable sources of electricity.

8. The City will address such issues as it deems relevant to its interests in this proceeding, including both issues that it identifies itself within the time set for such action and issues identified by others that may affect the City's interests.

9. The City has knowledge and expertise that may assist the Commission in reviewing PGE's proposed 2009 IRP. The City's appearance and participation will not unreasonably broaden the issues, burden the record or delay this proceeding.

10. The City of Portland waives paper service of documents.

WHEREFORE, the City of Portland requests an order authorizing it to intervene as a party in this proceeding.

DATED this 3<sup>rd</sup> day of December, 2009.

Respectfully submitted,

/s/ Benjamin Walters

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Benjamin Walters, OSB #85354  
Deputy City Attorney  
Attorney for City of Portland

LC 48 - SERVICE LIST

**W=Waive Paper  
service**

**C=Confidential  
HC=Highly Confidential**

**W**

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

**DEPARTMENT OF JUSTICE**

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

**W**

**PACIFIC ENVIRONMENTAL ADVOCACY CENTER**

AUBREY BALDWIN  
STAFF ATTORNEY/CLINICAL PROFESSOR  
10015 SW TERWILLIGER BLVD  
PORTLAND OR 97219  
[abaldwin@lclark.edu](mailto:abaldwin@lclark.edu)

**W**

**RENEWABLE NORTHWEST PROJECT**

KEN DRAGOON  
917 SW OAK, SUITE 303  
PORTLAND OR 97205  
[ken@rnp.org](mailto:ken@rnp.org)

**W**

**ECUMENICAL MINISTRIES OF OREGON**

JAMES EDELSON  
415 NE MIRIMAR PL  
PORTLAND OR 97232  
[edelson8@comcast.net](mailto:edelson8@comcast.net)

**W**

**CITIZENS' UTILITY BOARD OF OREGON**

GORDON FEIGNER (C)  
ENERGY ANALYST  
610 SW BROADWAY, SUITE 308  
PORTLAND OR 97205  
[gordon@oregoncub.org](mailto:gordon@oregoncub.org)

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

**W**                    **RENEWABLE NORTHWEST PROJECT**  
  
ANN ENGLISH GRAVATT  
POLICY DIRECTOR  
917 SW OAK - STE 303  
PORTLAND OR 97205  
[ann@rnp.org](mailto:ann@rnp.org)

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

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

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

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

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

- W**                    **FRIENDS OF COLUMBIA GORGE**
- MICHAEL LANG  
522 SW FIFTH AVENUE, SUITE 720  
PORTLAND OR 97204  
[michael@gorgefriends.org](mailto:michael@gorgefriends.org)
- W**                    **PACIFIC ENVIRONMENTAL ADVOCACY CENTER**
- ALLISON LAPLANTE  
10015 SW TERWILLIGER BLVD  
PORTLAND OR 97219  
[laplante@lclark.edu](mailto:laplante@lclark.edu)
- W**                    **IBERDROLA RENEWABLES, INC**
- 1125 NW COUCH ST, STE 700  
PORTLAND OR 97209  
[kevin.lynch@iberdrolausa.com](mailto:kevin.lynch@iberdrolausa.com)
- W**                    **CITIZENS' UTILITY BOARD OF OREGON**
- G. CATRIONA MCCRACKEN (C)  
LEGAL COUNSEL/STAFF ATTY  
610 SW BROADWAY - STE 308  
PORTLAND OR 97205  
[catriona@oregoncub.org](mailto:catriona@oregoncub.org)
- W**                    **IBERDROLA RENEWABLES, INC**
- TOAN-HAO NGUYEN  
1125 NW COUCH ST  
PORTLAND OR 97209  
[toan.nguyen@iberdrolausa.com](mailto:toan.nguyen@iberdrolausa.com)
- W**                    **PACIFICORP, DBA PACIFIC POWER**
- PACIFIC POWER OREGON DOCKETS  
825 NE MULTNOMAH STREET, STE 2000  
PORTLAND OR 97232  
[oregondockets@pacificorp.com](mailto:oregondockets@pacificorp.com)
- W**                    **\*OREGON DEPARTMENT OF ENERGY**
- KIP PHEIL  
SENIOR POLICY ANALYST  
625 MARION ST NE - STE 1  
SALEM OR 97301-3737  
[kip.pheil@state.or.us](mailto:kip.pheil@state.or.us)

**W**            **\*DEPARTMENT OF JUSTICE**  
  
JANET L PREWITT  
ASSISTANT AG  
NATURAL RESOURCES SECTION  
1162 COURT ST NE  
SALEM OR 97301-4096  
[janet.prewitt@doj.state.or.us](mailto:janet.prewitt@doj.state.or.us)

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

**W**            **\*OREGON DEPARTMENT OF ENERGY**  
  
VIJAY A SATYAL  
SENIOR POLICY ANALYST  
625 MARION ST NE  
SALEM OR 97301  
[vijay.a.satyal@state.or.us](mailto:vijay.a.satyal@state.or.us)

**PORTLAND GENERAL ELECTRIC**  
  
121 SW SALMON ST - 1WTC1711  
PORTLAND OR 97204  
[denise.saunders@pgn.com](mailto:denise.saunders@pgn.com)

**W**            **OREGON ENVIRONMENTAL COUNCIL**  
  
SALLIE SCHULLINGER-KRAUSE  
PROGRAM DIRECTOR  
222 NW DAVIS ST, SUITE 309  
PORTLAND OR 97209  
[sallies@oeconline.org](mailto:sallies@oeconline.org)

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

**W**            **ESLER STEPHENS & BUCKLEY**  
  
JOHN W STEPHENS  
888 SW FIFTH AVE STE 700  
PORTLAND OR 97204-2021  
[stephens@eslerstephens.com](mailto:stephens@eslerstephens.com)

**W                    PHYSICIANS FOR SOCIAL RESPONSIBILITY-OREGON CHAPTE**

CATHERINE THOMASSON  
CLIMATE CHANGE CHAIR OREGON PSR  
1227 NE 27TH #5  
PORTLAND OR 97232  
[thomassonc@comcast.net](mailto:thomassonc@comcast.net)

**W                    PACIFICORP**

PETE WARNKEN  
MANAGER, IRP  
825 NE MULTNOMAH - STE 600  
PORTLAND OR 97232  
[pete.warnken@pacificorp.com](mailto:pete.warnken@pacificorp.com)

**W                    NORTHWEST ENERGY COALITION**

STEVEN WEISS  
SR POLICY ASSOCIATE  
4422 OREGON TRAIL CT NE  
SALEM OR 97305  
[steve@nwenergy.org](mailto:steve@nwenergy.org)

**W                    PACIFIC POWER & LIGHT**

JORDAN A WHITE  
SENIOR COUNSEL  
825 NE MULTNOMAH STE 1800  
PORTLAND OR 97232  
[jordan.white@pacificorp.com](mailto:jordan.white@pacificorp.com)



CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I have this day served copies of the foregoing Petition of City of Portland to Intervene as a Party to all parties or attorneys of record listed on the attached OPUC Docket No. LC 48 service list in this matter.

DATED this 3<sup>rd</sup> day of December, 2009.

/s/ Benjamin Walters

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Benjamin Walters, OSB #85354