

May 11, 2010

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 the Association of Oregon Counties Motion to Intervene Out of Time and Petition to Intervene in the above captioned matter.

Sincerely.

Paul Snider

Association of Oregon Counties

# BEFORE THE PUBLIC UTILTY COMMISSION

## OF OREGON

	LC 48	
In the matter of Portland General Electric Company 2009 Integrated Resource Plan filing	) ) ) )	MOTION TO INTERVENE OUT OF TIME

The Association of Oregon Counties hereby moves to for permission to intervene out of time. The Association of Oregon Counties 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.

The Association of Oregon Counties 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 11, 2010

Representative of Association of Oregon Counties

# 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: Association of Oregon Counties

Address: 1201 Court Street NE, PO Box 12729, Salem, OR 97309

Phone Number: 503-585-8351

Fax Number: 503-373-7876

Name of Counsel for Petitioner: Paul Snider, Legal Counsel

Counsel's Address: 1201 Court Street NE, PO Box 12729, Salem, OR 97309

Counsel's Phone Number: 503-585-8351

Counsel's Fax Number: 503-373-7876

Please Send Copies To: Paul Snider

IF THE PETITIONER IS AN ORGANIZATION, THE NUMBER OF MEMBERS IN AND THE PURPOSES OF THE ORGANIZATION:

AOC is an organization of thirty-five counties of the state of Oregon. Its purposes include to cooperate with other public or private organizations to improve the capability of local government to serve and protect the public interest, to participate in litigation wherein the rights and liabilities of counties are affected and to do all other things necessary and proper for the benefit of the counties of the state.

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

AOC 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 and as a representative of providers of the vital public services throughout the state, we have an interest in ensuring that the Boardman 2020 Plan receives a thorough and complete vetting 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 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.

Paul Snider, Legal Counsel

Association of Oregon Counties

# 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 11, 2010

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