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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

Petition to Intervene 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 Petition to Intervene and waiver of paper service 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	)	
	)	
PORTLAND GENERAL ELECTRIC	)	SIERRA CLUB, COLUMBIA
	)	RIVERKEEPER, FRIENDS OF
2009 Integrated Resource Plan	)	THE COLUMBIA GORGE, AND
	)	THE NORTHWEST ENVIRONMENTAL
	)	DEFENSE CENTER’S PETITION TO
	)	INTERVENE and Waiver of Paper
	)	Service

Pursuant to ORS 756.525 and OAR 860-012-0001, Sierra Club, Columbia Riverkeeper, Friends of Columbia Gorge and the Northwest Environmental Defense Center (“Petitioners”) hereby petition to intervene in this proceeding. In support of this Petition, Petitioners state as follows:

1. The name and address of the Petitioners are as follows:

Doug Howell  
Sierra Club  
180 Nickerson Street, Suite 202  
Seattle, WA 98109  
Phone: (206) 378-0114 x 304  
Fax: (206) 378-0034  
doug.howell@sierraclub.org

Lauren Goldberg  
Columbia Riverkeeper  
724 Oak Street  
Hood River, OR 97031  
541.387.3030 phone  
541.387.3029  
lauren@columbiariverkeeper.org

Michael Lang  
Friends of Columbia Gorge  
522 SW Fifth Avenue, Suite 720  
Portland, OR 97204  
503.241.3762 phone  
503.241.3873 fax  
michael@gorgefriends.org

Mark Riskedahl  
Northwest Environmental Defense Center  
10015 SW Terwilliger Blvd.  
Portland, OR 97219  
503.768.6673 phone  
503.768.6671 fax  
msr@nedc.org

2. Aubrey Baldwin and Allison LaPlante from the Pacific Environmental Advocacy Center, and Gloria Smith from the Sierra Club’s Environmental Law Program will represent Petitioners in this proceeding. All documents related to this proceeding should be served on Petitioner’s attorneys at the following addresses:

Aubrey Baldwin  
Allison LaPlante  
Pacific Environmental Advocacy Center  
10015 SW Terwilliger Blvd.  
Portland, Oregon 97219  
503.768.6929, 503.768.6894 phone  
503.768.6642 fax  
abaldwin@lclark.edu  
laplante@lclark.edu

Gloria D. Smith  
Sierra Club Law Program  
85 Second Street  
San Francisco, CA 94105  
415.997.5532 phone  
415.997.7593 fax  
gloria.smith@sierraclub.org

3. The Sierra Club, founded in 1892, is the nation’s oldest non-profit, grass-roots environmental organization. The Oregon Chapter of the Sierra Club is a non-profit member-supported, public interest organization that promotes conservation of the Oregon natural environment by influencing public policy decisions—legislative, administrative, legal, and electoral. The Oregon Sierra Club has more than twenty thousand (20,000) members in the state. The Sierra Club’s 1.3 million members nationwide are dedicated to the protection and preservation of the natural and human environment, including protecting public health. The Sierra Club’s most important current priority is to advance smart, clean energy solutions that address the critical problems of global warming, air pollution, and our nation’s dependence on fossil fuels.

Friends of the Columbia Gorge (Friends) is a non-profit organization founded in 1980 to push for federal protection of the Columbia River Gorge. Today, Friends is the only non-profit

dedicated entirely to protecting the Columbia River Gorge. With a staff of 12, offices in Portland and Hood River, and nearly 5,000 members from Oregon and Washington, Friends is uniquely suited to ensuring that the wild and beautiful Columbia River Gorge remains a place apart, an unspoiled treasure for generations to come. In recent years, Friends has dedicated substantial time and resources to addressing energy choices in Oregon that impact the Columbia River Gorge National Scenic Area. Two of Friends' current priorities are to support appropriately-sited, clean, renewable energy development, and to improve air quality in the Gorge.

Columbia Riverkeeper is a non-profit organization that seeks to restore and protect the water quality of the Columbia River and all life connected to it, from the headwaters to the Pacific Ocean. Columbia Riverkeeper uses an integrated strategy of community-based grassroots organizing, public education, legal enforcement, and hands-on citizen involvement in tangible river protection projects. Columbia Riverkeeper has over 150 trained CRK volunteers working to monitor water quality in key salmon habitats on the Columbia River. Two of Columbia Riverkeeper's current priorities focus on promoting conservation and renewable resources to meet Oregon's future electrical power needs, and reducing toxics in the Columbia River watershed.

Northwest Environmental Defense Center ("NEDC") is an independent, non-profit organization working to protect the environment and natural resources of the Pacific Northwest. NEDC was established by a group of professors, law students and attorney alumni at Lewis and Clark Law School in 1969 for the purpose of providing legal support to individuals and grassroots organizations with environmental concerns, and engaging in litigation independently

or in conjunction with other environmental groups. For several years, NEDC has worked to promote cleaner energy solutions to protect the resources of the Pacific Northwest from the deleterious impacts of pollution from the operation of Portland General Electric's ("PGE") Boardman coal fired power plant.

4. Petitioners have a substantial interest in this docket. Petitioners' members seek to advance energy development and resource procurement policies in Oregon that recognize the benefits of appropriately-sited, low-emission electricity generating resources for Oregon's economy and the health and well being of its citizens and natural environment. Petitioners' are concerned that proposals in the PGE's 2009 Integrated Resource Plan ("IRP") would increase pollution - including emissions of greenhouse gases - into the atmosphere, thus exacerbating the environmental and human health impacts already harming their members' interests. Petitioners' members in Oregon seek to promote clean energy alternatives to fossil fuels, such as wind, solar, and geothermal energy, so as to protect public health, Oregon's unique ecosystems (including the Columbia River watershed, the Columbia River Gorge National Scenic Area and other federally protected parks and wilderness areas), and to protect Oregon's position as a leader in environmental quality. Moreover, Petitioners seek to advance environmentally protective policies in Oregon in the belief that such policies provide long-term cost savings, risk avoidance, and other benefits for Oregon's economy and its electricity consumers.

5. On November 5, 2009, PGE filed its 2009 IRP, which will guide future resource acquisitions and commitments by PGE. As representatives of their members who are customers of PGE, Petitioners will be impacted by decisions made by PGE as guided by the IRP process. The issues that the Petitioners intend to raise at the proceeding include, but are not limited to,

problems and inconsistencies within PGE's 2009 IRP that suggest that significant portions should not be acknowledged. Specifically, many issues that the Sierra Club intends to raise relate to continued operation of the Boardman facility until 2040 and the failure of PGE's 2009 IRP to appropriately assess the environmental, economic and human health costs associated with that choice. Petitioners thus have a direct and substantial interest in this proceeding.

6. No other party will represent Petitioners' interest in this docket. Petitioners have no commercial interests.

7. Petitioners possess special knowledge and expertise that will assist the Commission in resolving the issues in the proceeding. Petitioners' collective expertise lies in quantifying and addressing environmental concerns related to many aspects of PGE's 2009 IRP. In addition to their long history of protection and preservation of the natural and human environment, Petitioners recently contracted with Synapse Energy Economics to provide a technical review of the 2009 IRP. Synapse is a well-respected national firm specializing in consulting on energy, economic and environmental topics. Synapse has a professional staff of twenty-two with more than 300 years of combined experience in the electricity and natural gas industries. Accordingly, Petitioners' participation in this proceeding will assist the Commission in resolving the issues, and will not unreasonably broaden the issues, unduly burden the record, or delay the proceeding.

8. Petitioners request that the names of Aubrey Baldwin, Allison LaPlante and Gloria Smith, counsel for Petitioners, be placed on the official service list in this docket.

9. Petitioners waive paper service of documents.

Wherefore, Petitioners ask that this Petition to Intervene be granted and requests all the rights of a party in this proceeding.

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 Sierra Club:

/s/ Aubrey Baldwin

Aubrey Baldwin, OSB No. 060414  
Aubrey Baldwin  
Pacific Environmental Advocacy Center  
10015 SW Terwilliger Blvd.  
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**LC 48 Service List**

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



<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  ENVT'L 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@oeonline.org</p>