



**Associated Oregon Industries**

1149 Court Street NE  
Salem, OR 97301-4030  
503.588.0050 Salem  
503.227.5636 Portland  
800.452.7862 Oregon  
503.588.0052 fax  
[www.aoi.org](http://www.aoi.org)

**OFFICERS**

Chairman of the Board  
DAN D. HARMON

President & CEO  
JAY M. CLEMENS

First Vice-Chair  
HOWARD D. WERTH  
Leupold & Stevens, Inc.

Treasurer  
ALBERT J. GOSIAK  
Diamond Fruit Growers, Inc.

Secretary  
TIMOTHY R. CLEVENGER  
The Papé Group, Inc.

Immediate Past Chair  
BEN C. FETHERSTON, JR.  
Fetherston Edmonds, LLP

May 5, 2010

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

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

**EXECUTIVE COMMITTEE**

STEVEN J. CLARK  
Community Newspapers

THOMAS J. CORRY  
Bank of America Oregon

ROBERT T. FRERES, JR  
Freres Lumber Co. Inc.

CANDICE L. HATCH  
Bridgewater Group, Inc.

PAUL G. HURD\*  
Diamler Trucks North America LLC

MARGARET D. KIRKPATRICK  
NW Natural

VIRGINIA W. LANG  
Qwest Communications

PATRICK C. McCORMICK  
Conkling Fiskum & McCormick

GREGORY A. MILLER  
Weyerhaeuser Company

JENNIFER R. MURRAY\*  
Evraz Inc. NA

NEIL J. NELSON  
Siltronic Corporation

R. PATRICK REITEN  
PacifiCorp

RONALD L. SAXTON  
JELD-WEN, inc.

C. JEANNE STATON  
Staton Companies

ALAN J. THAYER, JR.\*  
Innovative Law Group

WARREN J. THOMPSON\*  
Windedahl, Rangitsch & Thompson

DANIEL C. THORNDIKE\*  
Medford Fabrication

ELIZABETH J. WARMAN  
The Boeing Company

Dear Commissioners:

Enclosed are an original and a copy of Associated Oregon Industries' Motion to Intervene Out of Time and Petition to Intervene in the above captioned matter.

Sincerely,

Jay M. Clemens  
President & CEO

\*District Vice Chair

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  
 )  
 )  
\_\_\_\_\_ )

Associated Oregon Industries (AOI) hereby moves for permission to intervene out of time. AOI'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.

AOI 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 general business association representing approximately 1,600 Oregon companies, we have an interest in ensuring that the Boardman 2020 Plan receives a thorough and complete vetting.

Dated: May 5, 2010

  
Jay M. Clemens  
President & CEO  
Associated Oregon Industries

BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

LC 48

In the matter of Portland General )  
Electric Company 2009 )  
Integrated Resource Plan filing )  
\_\_\_\_\_ )

PETITION TO INTERVENE

ADDRESS: Associated Oregon Industries  
1149 Court St NE  
Salem, OR 97306

PHONE NUMBER: 503-588-0050

FAX NUMBER: 503-588-0052

E-MAIL ADDRESS: johnledger@aoi.org

NAME OF COUNSEL FOR PETITIONER:

COUNSEL'S ADDRESS:

COUNSEL'S PHONE NUMBER:

COUNSEL'S FAX NUMBER:

COUNSEL'S E-MAIL ADDRESS:

PLEASE SEND COPIES TO: John Ledger, Vice President  
Associated Oregon Industries  
1149 Court Street NE  
Salem OR 97301

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

AOI is the state's largest, comprehensive general business association representing approximately 1,600 member companies statewide. The purpose of AOI, amongst others, is to advocate for the interests of these members before the state legislature, regulatory agencies and other governmental bodies.

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

AOI 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 representing the interests of approximately 1,600 member companies, 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 at this time. However, our comments will be reflective of our members generally and 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 at this time. However, our comments will be reflective of our members generally and will not broaden the issues, burden the record, or unreasonably delay the proceeding.

Based on the information provided above in accordance with the Commission's rules of procedure, I request to participate in this proceeding as an intervener. 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.

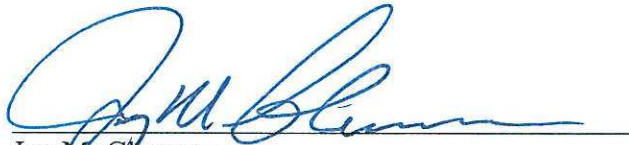
  
Jay M. Clemens  
President & CEO  
Associated Oregon Industries

5-5-10  
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 U.S. 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: 5-5-10



Jay M. Clemens  
President & CEO  
Associated Oregon Industries

All those with a "W" next to their name were sent an electronic copy of the Docket – those without a "W" beside their name were sent a hard copy.

<u>ACTIONS</u>	<u>SERVICE LIST (Parties)</u>	<u>SCHEDULE</u>
W=Waive Paper service	C=Confidential HC=Highly Confidential	Sort by Last Name      Sort by Company Name
<b>W</b>	<b>RICHARDSON &amp; O'LEARY</b>  GREGORY MARSHALL ADAMS (C) ATTORNEY	PO BOX 7218 BOISE ID 83702 greg@richardsonandoleary.com
	<b>DEPARTMENT OF JUSTICE</b>  STEPHANIE S ANDRUS (C) ASSISTANT ATTORNEY GENERAL	REGULATED UTILITY & BUSINESS SECTION 1162 COURT ST NE SALEM OR 97301-4096 stephanie.andrus@state.or.us
<b>W</b>	<b>CITY OF PORTLAND - PLANNING &amp; SUSTAINABILITY</b>  MICHAEL ARMSTRONG (C) SUSTAINABILITY MANAGER	1900 SW 4TH AVE, STE 7100 PORTLAND OR 97201 michael.armstrong@portlandoregon.gov
<b>W</b>	<b>PACIFIC ENVIRONMENTAL ADVOCACY CENTER</b>  AUBREY BALDWIN (C) STAFF ATTORNEY/CLINICAL PROFESSOR	10015 SW TERWILLIGER BLVD PORTLAND OR 97219 abaldwin@lclark.edu
<b>W</b>	<b>TURLOCK IRRIGATION DISTRICT</b>  RANDY BAYSINGER ASSISTANT GENERAL MANAGER	PO BOX 949 TURLOCK CA 95381-0949 rcbaysinger@tid.org
	<b>OREGON AFL-CIO</b>  JOHN BISHOP	1635 NW JOHNSON ST PORTLAND OR 97209 jbishop@mbjlaw.com
	<b>SEDCOR</b>  RAYMOND BURSTEDT PRESIDENT	625 HIGH ST NE, STE 200 SALEM OR 97301 rburstedt@sedcor.com
<b>W</b>	<b>CABLE HUSTON BENEDICT ET AL</b>  J LAURENCE CABLE (C)	1001 SW 5TH AVE STE 2000 PORTLAND OR 97204-1136 lcable@cablehuston.com
<b>W</b>	<b>COLUMBIA CORRIDOR ASSOCIATION</b>	

	CORKY COLLIER	PO BOX 55651 PORTLAND OR 97238 corky@columbiacorridor.org
<b>W</b>	<b>DAVIS WRIGHT TREMAINE LLP</b>	
	JOHN DILORENZO	1300 SW FIFTH AVE, STE 2300 PORTLAND OR 97201 johndilorenzo@dwt.com
<b>W</b>	<b>RENEWABLE NORTHWEST PROJECT</b>	
	KEN DRAGOON	917 SW OAK, SUITE 303 PORTLAND OR 97205 ken@rnp.org
	<b>INDUSTRIAL CUSTOMERS OF NORTHWEST UTILITIES</b>	
	MICHAEL EARLY EXECUTIVE DIRECTOR	1300 SW 5TH AVE, STE 1750 PORTLAND OR 97204-2446 mearly@icnu.org
<b>W</b>	<b>ECUMENICAL MINISTRIES OF OREGON</b>	
	JAMES EDELSON	415 NE MIRIMAR PL PORTLAND OR 97232 edelson8@comcast.net
<b>W</b>	<b>CITIZENS' UTILITY BOARD OF OREGON</b>	
	GORDON FEIGNER (C) ENERGY ANALYST	610 SW BROADWAY, SUITE 308 PORTLAND OR 97205 gordon@oregoncub.org
	<b>PUBLIC UTILITY COMMISSION</b>	
	MAURY GALBRAITH	PO BOX 2148 SALEM OR 97308 maury.galbraith@state.or.us
<b>W</b>	<b>OREGON ENVIORNMENTAL COUNCIL</b>	
	JANA GASTELLUM PROGRAM DIRECTOR, GLOBAL WARMING	222 NW DAVIS ST, STE 309 PORTLAND OR 97309-3900 janag@oeconline.org
<b>W</b>	<b>COLUMBIA RIVERKEEPER</b>	
	LAUREN GOLDBERG (C)	724 OAK STREET HOOD RIVER OR 97031 lauren@columbiariverkeeper.org
	<b>PORTLAND GENERAL ELECTRIC</b>	
	PATRICK G HAGER (C) MANAGER - REGULATORY AFFAIRS	121 SW SALMON ST 1WTC0702 PORTLAND OR 97204 pge.opuc.filings@pgn.com
<b>W</b>	<b>NORTHWEST PIPELINE GP</b>	

	JANE HARRISON (C) MGR-MARKETING SERVICES	295 CHIPETA WAY SALT LAKE CITY UT 84158 jane.f.harrison@williams.com
<b>W</b>	<b>ECUMENICAL MINISTRIES OF OREGON</b>	
	JENNY HOLMES ENVIRONMENTAL MINISTRIES DIRECTOR	0245 SW BANCROFT, SUITE B PORTLAND OR 97239 jholmes@emoregon.org
<b>W</b>	<b>CITIZENS' UTILITY BOARD OF OREGON</b>	
	ROBERT JENKS (C) EXECUTIVE DIRECTOR	610 SW BROADWAY STE 308 PORTLAND OR 97205 bob@oregoncub.org
<b>W</b>	<b>NW INDEPENDENT POWER PRODUCERS</b>	
	ROBERT D KAHN EXECUTIVE DIRECTOR	1117 MINOR AVENUE, SUITE 300 SEATTLE WA 98101 rkahn@nippc.org
<b>W</b>	BRUCE A KASER	PO BOX 958 SILVERTON OR 97381-0958 brucekaser@comcast.net
<b>W</b>	<b>FRIENDS OF COLUMBIA GORGE</b>	
	MICHAEL LANG (C)	522 SW FIFTH AVENUE, SUITE 720 PORTLAND OR 97204 michael@gorgefriends.org
<b>W</b>	<b>PACIFIC ENVIRONMENTAL ADVOCACY CENTER</b>	
	ALLISON LAPLANTE (C)	10015 SW TERWILLIGER BLVD PORTLAND OR 97219 laplante@lclark.edu
<b>W</b>	<b>ASSOCIATED OREGON INDUSTRIES</b>	
	JOHN LEDGER	1149 COURT ST NE SALEM OR 97301 johnledger@aoi.org
<b>W</b>	<b>CABLE HUSTON BENEDICT HAAGENSEN &amp; LLOYD LLP</b>	
	RICHARD LORENZ (C)	1001 SW FIFTH AVE - STE 2000 PORTLAND OR 97204-1136 rlorenz@cablehuston.com
	<b>IBERDROLA RENEWABLES, INC</b>	
	KEVIN LYNCH	1125 NW COUCH ST STE 700 PORTLAND OR 97209 kevin.lynch@iberdrolausa.com
<b>W</b>	<b>OREGON SIERRA CLUB</b>	



	IVAN MALUSKI	1821 SE ANKEY ST PORTLAND OR 97214 ivan.maluski@sierraclub.org
<b>W</b>	<b>CITIZENS' UTILITY BOARD OF OREGON</b>	
	G. CATRIONA MCCrackEN (C) LEGAL COUNSEL/STAFF ATTY	610 SW BROADWAY - STE 308 PORTLAND OR 97205 catriona@oregoncub.org
<b>W</b>	<b>SALEM CHAMBER OF COMMERCE</b>	
	MIKE MCLARAN CHIEF EXECUTIVE OFFICER	1110 COMMERCIAL ST SE SALEM OR 97301 mike@salemchamber.org; jason@salemchamber.org
	<b>IBERDROLA RENEWABLES, INC</b>	
	TOAN-HAO NGUYEN	1125 NW COUCH ST PORTLAND OR 97209 toan.nguyen@iberdrolaus.com
<b>W</b>	<b>*OREGON DEPARTMENT OF ENERGY</b>	
	KIP PHEIL (C) SENIOR POLICY ANALYST	625 MARION ST NE - STE 1 SALEM OR 97301-3737 kip.pheil@state.or.us
<b>W</b>	<b>PNGC POWER</b>	
	JOHN PRESCOTT PRESIDENT AND CEO	711 NE HALSEY PORTLAND OR 97232 jprescott@pngcpower.com
<b>W</b>	<b>*DEPARTMENT OF JUSTICE</b>	
	JANET L PREWITT (C) ASSISTANT AG	NATURAL RESOURCES SECTION 1162 COURT ST NE SALEM OR 97301-4096 janet.prewitt@doj.state.or.us
	<b>IBEW LOCAL 125</b>	
	MARCY PUTMAN POLITICAL AFFAIRS & COMMUNICATION REPRESENTATIVES	17200 NE SACRAMENTO STREET PORTLAND OR 97230 marcy@ibew125.com
<b>W</b>	<b>NORTHWEST PIPELINE GP</b>	
	BRUCE REEMSnyder (C) SENIOR COUNSEL	295 CHIPETA WAY SALT LAKE CITY UT 84108 bruce.reemsnyder@williams.com
<b>W</b>	<b>RICHARDSON &amp; O'LEARY PLLC</b>	
	PETER J RICHARDSON (C)	PO BOX 7218 BOISE ID 83707 peter@richardsonandoleary.com
<b>W</b>	<b>NORTHWEST ENVIRONMENTAL</b>	

**DEFENSE CENTER**

MARK RISKEDAHL

10015 SW TERWILLIGER BLVD  
PORTLAND OR 97219  
msr@nedc.org

**DAVISON VAN CLEVE**

IRION A SANGER (C)  
ASSOCIATE ATTORNEY

333 SW TAYLOR - STE 400  
PORTLAND OR 97204  
ias@dvclaw.com

**W \*OREGON DEPARTMENT OF ENERGY**

VIJAY A SATYAL (C)  
SENIOR POLICY ANALYST

625 MARION ST NE  
SALEM OR 97301  
vijay.a.satyal@state.or.us

**PORTLAND GENERAL ELECTRIC**

DENISE SAUNDERS (C)  
ASST GENERAL COUNSEL

121 SW SALMON ST - 1WTC1711  
PORTLAND OR 97204  
denise.saunders@pgn.com

**W OREGON DEPARTMENT OF ENERGY**

ANDREA F SIMMONS (C)

625 MARION ST NE  
SALEM OR 97301-3737  
andrea.f.simmons@state.or.us

**W SIERRA CLUB LAW PROGRAM**

GLORIA D SMITH (C)

85 SECOND STREET  
SAN FRANCISCO CA 94105  
gloria.smith@sierraclub.org

**W ESLER STEPHENS & BUCKLEY**

JOHN W STEPHENS (C)

888 SW FIFTH AVE STE 700  
PORTLAND OR 97204-2021  
stephens@eslerstephens.com;  
mec@eslerstephens.com

**BOMA PORTLAND**

SUSAN STEWARD  
EXECUTIVE DIRECTOR

200 SW MARKET, SUITE 1710  
PORTLAND OR 97201  
susan@bomaportland.org

**OREGON CATTLEMEN'S ASSOCIATION**

KAY TEISL

3415 COMMERCIAL ST SE, SUITE 217  
SALEM OR 97302  
kayteisl@orcattle.com

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

CATHERINE THOMASSON  
CLIMATE CHANGE CHAIR

1227 NE 27TH #5  
PORTLAND OR 97232

	OREGON PSR	thomassonc@comcast.net
<b>W</b>	<b>CITY OF PORTLAND - PLANNING &amp; SUSTAINABILITY</b>	
	DAVID TOOZE (C) SENIOR ENERGY SPECIALIST	1900 SW 4TH STE 7100 PORTLAND OR 97201 david.tooze@portlandoregon.gov
<b>W</b>	<b>DAVIS WRIGHT TREMAINE LLP</b>	
	MARK P TRINCHERO	1300 SW FIFTH AVE STE 2300 PORTLAND OR 97201-5682 marktrincher@dwt.com
<b>W</b>	<b>CITY OF PORTLAND - CITY ATTORNEY'S OFFICE</b>	
	BENJAMIN WALTERS (C) CHIEF DEPUTY CITY ATTORNEY	1221 SW 4TH AVE - RM 430 PORTLAND OR 97204 ben.walters@portlandoregon.gov
<b>W</b>	<b>PACIFICORP ENERGY</b>	
	PETE WARNKEN MANAGER, IRP	825 NE MULTNOMAH - STE 600 PORTLAND OR 97232 pete.warnken@pacificorp.com
<b>W</b>	<b>CLACKAMAS COUNTY BUSINESS ALLIANCE</b>	
	BURTON WEAST EXECUTIVE DIRECTOR	300 OSWEGO POINTE DR, STE 220 LAKE OSWEGO OR 97034 burton@ccba.biz
<b>W</b>	<b>NORTHWEST ENERGY COALITION</b>	
	STEVEN WEISS SR POLICY ASSOCIATE	4422 OREGON TRAIL CT NE SALEM OR 97305 steve@nwenergy.org
<b>W</b>	<b>PACIFIC POWER &amp; LIGHT</b>	
	JORDAN A WHITE SENIOR COUNSEL	1407 W. NORTH TEMPLE, STE 320 SALT LAKE CITY UT 84116 jordan.white@pacificorp.com
<b>W</b>	<b>OREGON FOREST INDUSTRIES COUNCIL</b>	
	RAY WILKESON	PO BOX 12826 SALEM OR 97309 ray@ofic.com
	<b>NORTHWEST FOOD PROCESSORS ASSOCIATION</b>	
	DAVID ZEPPONI PRESIDENT	8338 NE ALTERWOOD RD, STE 160 PORTLAND OR 97220 pbarrow@nwfpa.org