

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I have this day served the attached Comments regarding UM 1535 for Turner Energy Center upon all parties of record in this proceeding, as shown below, by causing the same to be delivered via electronic mail, as all parties have waived paper service.

Dated at Portland, Oregon, this 26th day of August, 2013

Sincerely,


Richard Avery Baranzano

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August 26, 2013

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RE: Docket No. UM 1535

Commissioners,

We also welcome the opportunity to comment on Docket No. UM 1535. Unfortunately, the RFP process was geared toward projects that can connect directly to PGE. The Proposed 620 MW Turner Energy Center cannot connect directly to PGE but must first run a line to tap a nearby PacifiCorp line and ultimately connect to the Bethel substation. Anticipating PacifiCorp's reluctance, not only is this an unfairly high hurdle but, the RFP, as designed, also tended to direct most, if not all, of the qualifying proposals to the Columbia River Corridor.

Time is also needed to allow any projects not connecting directly to PGE to enter into the FERC regulated process for interconnection with PGE. This process takes between 12 and 18 months.

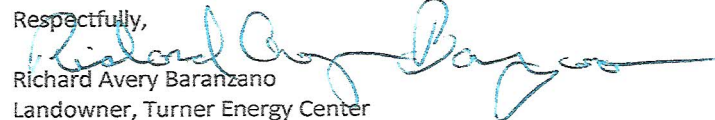
The Columbia River environment is already under extreme pressure from the proposed Coal and Oil Terminal Projects along with the accompanying rail transportation issues. The Columbia River environment is the last place that all of the power plant facilities should be located. Not only is Turner Energy Center centrally located but, it should be well accommodated by the I-5 Corridor Transmission Reinforcement Upgrades.

Attached for informational purposes, is the 2005 Draft Proposed Order Table of Contents, issued by the Oregon Department of Energy for the Turner Energy Center. RFP bid scoring category, "Price Score", representing a full 60% of total scoring weight, can more accurately and honestly be calculated by avoiding much of the price uncertainty surrounding other bids that lack detailed engineering and DOE outlined conditions. Again, we presently simply need time to enter into the FERC regulated process. Other facilities afterwards need time and, good luck I might add, to remove the all the other compounding uncertainties involved in power plant sitings.

Certainly, shouldn't the Justice Department assure that the playing field for private power providers are leveled in allowing for connections to public utility transmission facilities at a reasonable, predictable cost? Understanding this overall landscape of incongruities along with the assured resulting outcome of the RFP, it must be assumed that the future demand for energy was simply aligned as an opportunity for PGE?

In closing, Commission RFP guidelines requiring that resources should undergo a bidding process to ensure obtaining least-cost resources for customers could be more easily achieved by removing any artificial cost and time barriers for proposed power generating facilities connecting to existing transmission lines.

Respectfully,


Richard Avery Baranzano
Landowner, Turner Energy Center

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BEFORE THE ENERGY FACILITY SITING COUNCIL
OF THE
STATE OF OREGON

IN THE MATTER OF THE APPLICATION)
FOR A SITE CERTIFICATE FOR THE) DRAFT PROPOSED ORDER
TURNER ENERGY CENTER)

Issued by
Oregon Department of Energy
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March 2, 2005

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