



February 13, 2013

Commission Chair Susan Ackerman
Commissioner John Savage
Commissioner Stephen Bloom
Public Utility Commission of Oregon
550 Capitol St. NE
Salem, Oregon 97301-2551

RE: UM 1535 -- Portland General Electric Company's Request for Proposals

Dear Commissioners:

I write to you on behalf of the independent power industry with the greatest possible urgency.

Portland General Electric is manipulating your competitive procurement policy to its advantage. The integrity of the process that the Commission and stakeholders have devoted considerable effort has been compromised. The immediate risk is that highly competitive and creative thermal power supply options for Oregon consumers are about to be lost. The long-term implications are equally serious.

PGE has corrupted your competitive procurement policy by selecting only those elements of the Commission's guidelines with which it is comfortable. The company's excessive confidence in the "Independent Evaluator," Accion, is suspicious, particularly given PGE's unwillingness to meaningfully share its findings.

Accion's public report covers little more than busy work. One can only speculate on the value of the report's confidential appendices, but most likely they will continue the pattern of failing to meet the Commission's expectations for transparency and analysis.

IPPs and consumer advocates are not the only constituencies closely following PGE's thermal RFP. Wall Street has its clear preference (see attachment to this letter).

NIPPC members and others have invested tens of millions of dollars to compete in PGE's current RFP. The Commission's long-standing policy gave these bidders reason to expect a fair process; they no longer do.

NIPPC fully appreciates the limitations of your "guidelines," but we are filing the enclosed comments letter from our attorney to identify specific constructive action that the Commission could take to restore a measure of fairness to the current bid provided you act decisively and swiftly.

Sincerely,

Robert D. Kahn, Ed.D
Executive Director



RICHARDSON & O'LEARY

ATTORNEYS AT LAW

Tel: 208-938-7900 Fax: 208-938-7904

P.O. Box 7218 Boise, ID 83707 - 515 N. 27th St. Boise, ID 83702

February 13, 2013

Commission Chair Susan Ackerman
Commissioner John Savage
Commissioner Stephen Bloom
Public Utility Commission of Oregon
550 Capitol St. NE
Salem, Oregon 97301-2551

Re: UM 1535 -- Portland General Electric Company's Request for Proposals

Dear Commissioners:

I write on behalf of the Northwest and Intermountain Power Producers Coalition (“NIPPC”) to express concerns and request further action with regard to Portland General Electric Company’s (“PGE”) request for proposals (“RFP”) for capacity and energy resources. NIPPC greatly appreciates the efforts by the Public Utility Commission of Oregon (“OPUC” or “Commission”) to provide an opportunity for independent power producers (“IPPs”) to attempt to compete for the opportunity to provide cost-effective generation resources to retail electricity customers. In this particular instance, NIPPC is surprised and disappointed by PGE’s decision not to seek Commission acknowledgement of the final short lists for the combined Energy and Capacity RFP. There have been serious questions from the start regarding the fairness of the scoring and evaluation in this combined RFP. The recently filed Independent Evaluator (“IE”) report does not describe in detail the assumptions and evaluation utilized for a number of these critical items, including treatment of bids for a combined Energy and Capacity bid on the same site, and cost assumptions used for transmission. The IE has been provided no opportunity to provide further information because PGE proposes to skip the short list acknowledgement phase of the process. As explained below, while NIPPC recognizes that acknowledgement of the short list is not mandatory, NIPPC urges the Commission to take action at this time to encourage PGE to return to the Commission’s RFP process, or at least collect the relevant information regarding PGE’s decision while it is still available for production.

The Importance of Commission Review Prior to Major Utility Decisions

The Commission has demonstrated its strong preference that utilities keep the Commission well-informed regarding major resource decisions, *prior* to making major expenditures. *See In Re PacifiCorp dba Pacific Power: Request for General Rate Revision*, OPUC Docket No. UE 246, Order No. 12-493, at 33 (2012) (disallowing certain pollution control expenditures from rates

based in part on faulty planning). These same principles should apply to acknowledgement of an RFP short list. RFP Guideline 11 *specifically requires* the IE to provide a closing report and *additional* information regarding the short list selections, even if the utility does not seek acknowledgement. *See* Order No. 06-446 at Appendix A at 4. Although the RFP Guidelines do not technically *require* the utility to seek acknowledgement of the short list in an RFP, for each major resource acquisition occurring since revision of the RFP Guidelines in 2006, the utility has in fact sought acknowledgment prior to acquiring the resource. *See* Docket Nos. UM 1368, UM 1208/UM 1360, UM 1429. This review process has predictably resulted in material modifications from the utility's proposed action. For example, in UM 1368, the Commission required that the independent evaluator remain engaged through final negotiations. Thereafter, PacifiCorp executed the only power purchase agreement ("PPA") for a major resource with an IPP (Duke Energy) that has yet emerged from an Oregon RFP for a major resource under the current guidelines.

The Commission has further demonstrated its expectation that it will have the opportunity to review the short list of the RFP with more recent orders. In revising Guideline 13, the Commission stated:

As proposed by staff, we modify Guideline 13 to require Staff, at the time of acknowledgement of the utility's final short list of RFP resources, to make a recommendation regarding whether the Commission should require IE involvement through final resource selection. Other parties, including bidders, may also request expanded IE involvement at that time, and the Commission may expand the IE's role on its own motion.

Order No. 11-340 at 4. The Commission is also investigating a better analytic framework that should be used in RFP Guideline 10(d) to evaluate and compare resource ownership to purchasing power from an independent power producer to improve upon IE closing reports. *See* Order No. 11-001 at 6. All of this demonstrates that the Commission's oversight and short list acknowledgement is not a perfunctory process. The Commission expects the utility to involve the Commission and other parties so that, at a minimum, the Commission is kept informed about anticipated major utility investments.

PGE's Proposal to Side-Step Commission Involvement in Short List Evaluation

The Commission has properly shown interest in ensuring PGE's RFP is conducted in a fair manner. PGE's RFP has already required significant revision by the Commission. *See* Order Nos. 11-371; 12-215. Of particular note, the Commission required PGE to combine the Energy RFP with the Capacity RFP to allow bidders to propose a combined bid for both major resources on the same site at a lower cost than individual bids. There is no reason to doubt that Commission review of PGE's proposed short lists would result in further revision of PGE's initial decisions.

However, despite (or perhaps because of) the Commission's obvious interest, PGE has decided to bypass the RFP acknowledgement stage. Although PGE's decisions are not contained in the

IE Report or any filing in this docket, PGE did communicate its decisions to Wall Street analysts through press releases, as evidenced by a market report prepared by Deutsche Bank which is provided as Attachment 1 to this letter. As Deutsche Bank observes, on January 31, 2013, “POR [PGE] announced that its benchmark Port Westward 2 peaker project had won the capacity RFP. . . . After several delays in the RFP, we note that the announcement of the winning capacity bid was earlier than we had anticipated.” The market analysts went on to conclude:

We view the success of the Port Westward 2 benchmark project favorably, as it underpins our 2015 growth outlook. We continue to believe that the results of the two remaining RFPs provide additional catalysts for POR [PGE], particularly since either one would provide a significant EPS growth opportunity.

Thus PGE apparently believes that the IE’s closing report – standing alone and un-reviewed by the Commission – supports PGE’s decision to self-select its Port Westward 2 benchmark resource. PGE also apparently believes that the IE’s closing report supports PGE’s decision to proceed with negotiations with a single bidder in the Energy RFP, and to do so without even making public whether that bidder proposed a utility ownership structure. In both cases, PGE apparently believes there is no need provide the Commission or anyone else with any opportunity to provide any input into whether it would be appropriate for PGE to retain the IE through final resource selection.

Request for Commission Action

NIPPC recognizes that the Commission’s Guidelines on RFP acknowledgement are technically permissive, but the Commission has ample authority to investigate PGE’s decision at this time, or at the very least preserve evidence for future investigation. Documents and analysis regarding PGE’s chosen course of action will be critical in future rate recovery proceedings. Thus NIPPC suggests the following Commission actions are warranted at this time:

- **Request that the IE provide further information at a special public meeting.**

Guideline 11 states the IE must prepare a closing report. It also states, “*In addition*, the IE will make any detailed bid scoring and evaluation results available to the utility, Commission staff, and non-bidding parties in the RFP docket, subject to the terms of a protective order.” Order No. 06-446 at Appendix A at 4. The Commission further explained that “the IE will be involved in the acknowledgment process (*See* Guideline 13), and should complete the Closing Report before then” *Id.* at 14. The IE would therefore normally be available to the Commission and the parties to clarify any matters. That PGE has prematurely terminated the review process should not forestall the Commission from collecting the remaining information from the IE. Furthermore, the IE Report could be clarified on several important details. A probing review of the IE Report does not support PGE’s sweeping conclusions that its Port Westward 2 project was unquestionably the best resource, or that short list negotiations with only one bidder is appropriate for the Energy resource.

For example, the primary basis for requiring PGE to revise its initial RFP was to allow for IPPs to bid into both the Energy and Capacity RFPs at the same time to utilize the economies of scale of a single site for both resources. However, the IE Report makes no mention of how such bids were scored versus the benchmarks and other bids, or why no such bids for a combined facility were able to progress to the final resource selection like Port Westward 2.

Additionally, the cost of transmission to load is a critical price and non-price factor in this RFP. NIPPC is aware that some bidders offered projects that had the ability to directly connect to PGE's existing system without the need for Bonneville Power Administration ("BPA") transmission or Cascade Crossing. But the IE Report does not specify the cost assumptions for BPA transmission for the benchmarks and other bids requiring such transmission as compared to bids directly connected to PGE's system.

There are also unanswered questions surrounding the impact of the seasonal capacity bids. The IE Report notes that after the portfolio analysis conducted to establish the final short list several of the bids were more attractive than the initial scoring indicated. *IE Report* at 37. "Namely, the long energy portfolios that consisted of the larger baseload resources appeared particularly attractive. This was substantially a function of the relatively uneconomic seasonal Bids since the long energy portfolios did not have this capacity included." *Id.* Because PGE has stated its intention to refresh the seasonal capacity bids, the assumptions in this portfolio analysis are questionable. Furthermore, the portfolio analysis appears to have placed unreasonable limitations on an otherwise very competitive battery bid. These and other questions should be vetted by the Commission in a public forum while the information is fresh.

- **Require PGE to respond to discovery requests for use in a future prudence review while the data is fresh.**

The Commission has broad authority to "investigate" public utilities, and "has the right to obtain from any public utility . . . all necessary information to enable the commission to perform duties." ORS 756.070. PGE has apparently elected to shift the Commission's review of its short list selections until a future prudence review, which would occur in future years. In the recent PacifiCorp case, the Commission noted that quantifying the proper amount for disallowance was hindered by the very actions that underlie the finding of imprudence -- the utility's inadequate analysis and decision-making. *In Re PacifiCorp dba Pacific Power: Request for General Rate Revision*, Order No. 12-493 at 31; *see also In Re Application of Northwest Natural for General Rate Revision*, OPUC Docket No. UG 221, Order No. 12-437 at 17-18 (2012) (disallowing improperly planned gas pipeline from rates). The Commission should obtain the data that will be necessary for an adequate prudence review at this time while it is still available for production. RFP Guideline 12 permits confidential bid scoring and evaluation material to be used in rate recovery proceedings, and under the circumstances here that material should be produced at this time. *See* Order No. 06-446 at Appendix A at 4.

NIPPC has provided a preliminary set of information requests PGE should respond to at this time as Attachment 2. Even if the Commission is not itself inclined to order this material to be

provided at this time, the Commission should take steps to ensure that this material be provided to NIPPC and PGE's ratepayer advocates.

- **Encourage PGE to return to the RFP process, and inform PGE that in order to recover costs of retaining the IE through final resource selection, PGE must first seek acknowledgment of its proposed short list.**

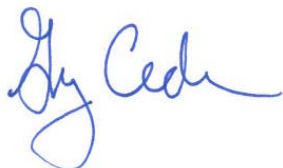
As alluded to above, PGE has deprived the Commission of its ability to decide whether the IE should be retained through the final resource selection. In Order No. 11-340, the Commission expressly stated that it would make such a decision based upon the recommendation of Commission Staff at the time of short list acknowledgement. Here, PGE has unilaterally made the decision itself. With regard to the Flexible Capacity resource, PGE has determined there will be no need to retain the IE through final resource selection because PGE declared the Port Westward 2 project is the clear winner. On the other hand, PGE has unilaterally determined it *will* retain the IE through negotiations for the Energy resource. Presumably, PGE intends to pass those further IE costs onto ratepayers.

PGE has turned the process on its head. If PGE wishes to recover the costs of the IE's observations, PGE must first seek Commission acknowledgement of the final short lists. Otherwise, PGE will have the IE observing negotiations that were never acknowledged as reasonable by the Commission, and the IE will therefore be serving and responding to PGE alone. PGE is free to retain its own independent consultant outside the parameters of the RFP Guidelines. But if PGE does so it must bear the costs of that consultant on its own.

Conclusion

In closing, NIPPC is extremely disappointed by PGE's recent decision to side-step the Commission's RFP Guidelines. PGE has repeatedly demonstrated its intent to secure utility owned resources to boost its earnings. Now, the Commission is faced with a serious challenge to its authority, and NIPPC is concerned that the RFP process will not survive as a meaningful opportunity for IPPs if PGE's actions go unchecked. For these reasons, NIPPC implores the Commission to take any action it sees fit to preserve the integrity to the process, as outlined herein or otherwise.

Very truly yours,



Gregory M. Adams
Attorney for the Northwest and Intermountain
Power Producers Coalition



Rating
Buy

North America
United States

Industrials
Utilities and Power

Company
**Portland General
Electric Alert**

Reuters POR.N Bloomberg POR US Exchange NYS Ticker POR

Date
1 February 2013

Breaking News

Price at 31 Jan 2013 (USD)	28.72
Price target	29.50
52-week range	28.72 - 24.37

Lauren Duke
Associate Analyst
(+1) 212 250-8204
lauren.duke@db.com

Jonathan Arnold
Research Analyst
(+1) 212 250-3182
jonathan.arnold@db.com

POR wins capacity RFP; energy still pending

POR's benchmark project wins capacity RFP

Yesterday, POR announced that its benchmark Port Westward 2 peaker project had won the capacity RFP. The 200MW project is expected to cost up to \$310M and be online in 2015. Our 2015 EPS estimate already includes this project, but we still view the RFP result as a key positive for POR. After several delays in the RFP, we note that the announcement of the winning capacity bid was earlier than we had anticipated. Construction on Port Westward 2 is expected to begin later this year, and we do not expect POR to need to issue equity to fund the project.

Energy RFP winning project still pending

In the press release, POR indicated that they will soon begin negotiations with the top project from the final short list in the energy RFP. In this RFP, POR is seeking 300-500MW of baseload capacity and submitted its Carty combined-cycle project as the benchmark bid. POR also noted that the final short list contains both power purchase agreements (PPAs) and POR-owned projects. The release did not specify whether the top bid was a PPA or ownership opportunity. We view the energy RFP as a major growth opportunity for POR in the event an ownership project is selected. No timeline was provided for negotiations on this RFP.

Renewables RFP resource selection by June

Lastly, POR indicated that they expect to make final resource selections in the outstanding renewables RFP by June. The most recent schedule in that RFP sets February 19 as the date for the determination of the final short list, with the Independent Evaluator report to follow in late February or March.

Potential positive catalysts still on the horizon

We view the success of the Port Westward 2 benchmark project favorably, as it underpins our 2015 growth outlook. We continue to believe that results of the two remaining RFPs provide additional potential catalysts for POR, particularly since either one would provide a significant EPS growth opportunity.

Stock & option liquidity data

Market cap (USDm)	2,164.4
Shares outstanding (m)	75.4
Free float (%)	100
Volume (31 Jan 2013)	173,696
Option volume (und. shrs., 1M avg.)	305
Short interest (m)	-
Short interest (%)	-
Institutional ownership (%)	-
DPS (USD)	1.08

Key data

FYE 12/31	2011A	2012E	2013E
1Q EPS	0.92	0.65A	0.65
2Q EPS	0.29	0.34A	0.34
3Q EPS	0.36	0.50A	0.50
4Q EPS	0.38	0.41	0.40
FY EPS (USD)	1.95	1.90	1.90
P/E (x)	12.4	15.1	15.1

* Includes the impact of FAS123R requiring the expensing of stock options.

Deutsche Bank Securities Inc.

Deutsche Bank does and seeks to do business with companies covered in its research reports. Thus, investors should be aware that the firm may have a conflict of interest that could affect the objectivity of this report. Investors should consider this report as only a single factor in making their investment decision. THE VIEWS EXPRESSED ABOVE ACCURATELY REFLECT PERSONAL VIEWS OF THE AUTHORS ABOUT THE SUBJECT COMPANY(IES) AND ITS(THEIR) SECURITIES. THEY HAVE NOT AND WILL NOT RECEIVE ANY COMPENSATION FOR PROVIDING A SPECIFIC RECOMMENDATION OR VIEW IN THIS REPORT. FOR OTHER DISCLOSURES PLEASE VISIT <http://gm.db.com/ger/disclosure/Disclosure.eqsr?ricCode=POR.N> MICA(P) 072/04/2012.

Requests for Information Supporting PGE's Short List Decisions

- 1) Please state publicly whether the Energy resource bid with which PGE proposes to commence negotiations is a bid for a PPA, TSA, EPC, or APSA.
- 2) Please provide the detailed score card for each bid on the initial short list and the updated score cards that resulted in development of the final shortlist.
- 3) The South of Allston flow gate is a known transmission constraint. Based upon posts on PGE's OASIS website PGE Transmission recently transferred 146 MW of Beaver Station generation to the BPA system. How has PGE Transmission secured transmission service through the South of Allston flow gate from the Trojan substation to PGE's load for the Port Westward 2 self build project? If other PGE generation is to be curtailed or transferred from PGE's transmission system lines to the BPA system how have these costs been incorporated into the evaluation?
- 4) Please provide the cost assumptions for BPA PTP transmission for bids requiring that cost to be passed onto ratepayers. Please specifically provide the cost assumptions used for transmission to load for bids on both of the benchmark sites.
- 5) Please explain how future costs of the gas storage were quantified and assumed at the PW 2 site. Please specifically explain the basis for the assumptions with reference to the terms of the gas storage agreement supporting the bid, and explain what cost contingencies were assumed for any unfixed costs for construction or ongoing storage costs in the agreement.
- 6) In Order 11-371 the Commission stated, "Combining the RFPs will allow bidders to offer to build capacity and energy resources at a single site to take advantage of economies of scale." One or more bidders submitted bids to both the capacity and energy portions of the RFP from the same site. Please describe how these bids were treated in the evaluation process and dealt with during each stage of the ranking process.
- 7) Please reference the IE Report at p. 16, stating "the price score is based on the sum of all fixed and variable costs levelized over the term of the Bid on a \$/MWh basis (or life of asset)" and later "it was seen that Bids with longer terms did benefit because the market costs escalated substantially due to underlying fundamental assumptions." What life of asset was used for evaluating asset sales, PGE self build, and EPC bids? Please explain how this assumption is consistent with industry standard accounting practices for the useful life of natural gas fired generating facilities? Please provide the "market costs" used in the analysis and the source.
- 8) In Order 12-398 the Commission directed the IE to "...report, contemporaneously with the determination of the short-list, any detrimental impacts the gas storage issues had on the RFP process..." The IE report states that the IE agreed with PGE's opinion that on-site liquid storage with dual fuel did not meet the RFP requirements without providing an analysis of the detrimental impacts of this decision. Please provide a version of the bid ranking at each stage of the RFP process if bids combining onsite liquid distillate fuel storage with interruptible gas transportation had not been excluded or penalized.
- 9) Based on public filings and the IE Report, the proposed Carty Lateral is designed to meet the needs of a 900 MW plant with a capacity to transport 175,000 Dth/day of natural gas to the proposed Carty facility. Please confirm that the PGE self build and EPC bids from the Carty site were evaluated using a gas transportation charge which spreads the full cost of the entire Carty Lateral designed for 900 MW over a single roughly 450 MW plant for the entire life of that plant, and provide the cost assumptions assigned to the Carty site.

- 10) Please provide the tariff assumptions for firm transportation used in analyzing bids proposing to acquire firm transportation service from Northwest Pipeline or GTN Pipeline. Also, please provide the tariff assumptions for interruptible transportation used in analyzing bids proposing to acquire interruptible transportation service from Northwest Pipeline or GTN Pipeline.
- 11) The IE Report states that battery bids “were required to have enough energy storage to be able to provide 6 hours of operation” in pre-qualification, presumably to be awarded credit for meeting PGE’s capacity needs on a comparable basis as other resources. Yet later on p. 35, the IE Report states that in the portfolio evaluation used to develop the final short list “credit was only given for capacity based on a limited number of hours of energy storage.” Given that the bid “was sized to comply” with the energy storage constraints applied in the pre-qualification process, the evaluation could only have reached these conclusions if the resource was dispatched inappropriately in the portfolio analysis modeling. Please explain why the bid would be penalized in the portfolio analysis if it was able to provide capacity at all times necessary to meet the energy storage requirements.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 13th day of February, 2013, a true and correct copy of the within and foregoing **NORTHWEST AND INTERMOUNTAIN POWER PRODUCERS COALITION'S COMMENTS LETTER in UM 1535** was served as shown to:

MATT KRUMENAUER
VIJAY A SATYAL
Oregon Department of Energy
625 Marion St NE
Salem OR 97301
matt.krumenauer@state.or.us
vijay.a.satyal@state.or.us

Hand Delivery
 U.S. Mail, postage pre-paid
 Facsimile
 Electronic Mail

HAROLD T JUDD
Accion Group Inc
244 North Main Street
Concord NH 03301
hjudd@acciongroup.com

Hand Delivery
 U.S. Mail, postage pre-paid
 Facsimile
 Electronic Mail

J LAURENCE CABLE
RICHARD LORENZ
CHAD M STOKES
Cable Huston Benedict et al
1001 SW 5th Ave Ste 2000
Portland OR 97204-1136
lcable@cablehuston.com
rlorenz@cablehuston.com
cstokes@cablehuston.com

Hand Delivery
 U.S. Mail, postage pre-paid
 Facsimile
 Electronic Mail

ROBERT JENKS
G CATRIONA MCCracken
Citizens' Utility Board of Oregon
610 SW Broadway Ste 400
dockets@oregoncub.org
bob@oregoncub.org
catriona@oregoncub.org

Hand Delivery
 U.S. Mail, postage pre-paid
 Facsimile
 Electronic Mail

IRION A SANGER
S BRADLEY VAN CLEVE
Davison Van Cleve
333 SW Taylor Ste 400
Portland OR 97204
ias@dvclaw.com
bvc@dvclaw.com

Hand Delivery
 U.S. Mail, postage pre-paid
 Facsimile
 Electronic Mail

JOHN W STEPHENS
Esler Stephens & Buckley
888 SW Fifth Ave Ste 700
Portland OR 97204-2021
stephens@eslerstephens.com
mec@eslerstephens.com

Hand Delivery
 U.S. Mail, postage pre-paid
 Facsimile
 Electronic Mail

WENDY GERLITZ
NW Energy Coalition
1205 SE Flavel
Portland OR 97202
wendy@nwenergy.org

Hand Delivery
 U.S. Mail, postage pre-paid
 Facsimile
 Electronic Mail

RENEE M FRANCE
Oregon Department of Justice
1162 Court St NE
Salem OR 97301-4096
renee.m.france@doj.state.or.us

Hand Delivery
 U.S. Mail, postage pre-paid
 Facsimile
 Electronic Mail

R BRYCE DALLEY
OREGON DOCKETS
Pacific Power
825 NE Multnomah St Ste 2000
Portland OR 97232
bryce.dalley@pacificorp.com
oregondockets@pacificorp.com

Hand Delivery
 U.S. Mail, postage pre-paid
 Facsimile
 Electronic Mail

MARY WIENCKE
Pacific Power
825 NE Multnomah St Ste 1800
Portland OR 97232-2149
mary.wiencke@pacificorp.com

Hand Delivery
 U.S. Mail, postage pre-paid
 Facsimile
 Electronic Mail

RANDY DAHLGREN
Portland General Electric
121 SW Salmon St 1WTC0702
Portland OR 97204
pge.opuc.filings@pgn.com

Hand Delivery
 U.S. Mail, postage pre-paid
 Facsimile
 Electronic Mail

V DENISE SAUNDERS
Portland General Electric
121 SW Salmon St 1WTC1301
Portland OR 97204
denise.saunders@pgn.com

Hand Delivery
 U.S. Mail, postage pre-paid
 Facsimile
 Electronic Mail

ERIK COLVILLE
Public Utility Commission
PO Box 2148
Salem OR 97308-2148
erik.colville@state.or.us

Hand Delivery
 U.S. Mail, postage pre-paid
 Facsimile
 Electronic Mail

STEPHANIE S ANDRUS
PUC Staff – Department of Justice
1162 Court St NE
Salem OR 97301-4096
stephanie.andrus@state.or.us

Hand Delivery
 U.S. Mail, postage pre-paid
 Facsimile
 Electronic Mail

DONALD W SCHOENBECK
Regulatory & Cogeneration Services Inc
900 Washington St Ste 780
Vancouver WA 98660-3455
dws@r-c-s-inc.com

Hand Delivery
 U.S. Mail, postage pre-paid
 Facsimile
 Electronic Mail

MEGAN WALSETH DECKER
JIMMY LINDSAY
Renewable Northwest Project
421 SW 6th Ave #1125
Portland OR 97204-1629
megan@rnp.org
jimmy@rnp.org

Hand Delivery
 U.S. Mail, postage pre-paid
 Facsimile
 Electronic Mail

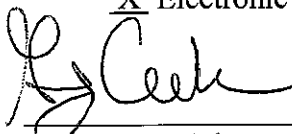
CHUCK SIDES
Tepper LLC
PO Box 2087
Salem OR 97308
chucksides@mgoregon.com

Hand Delivery
 U.S. Mail, postage pre-paid
 Facsimile
 Electronic Mail

PAULA E PYRON
Troutdale Energy Center
4113 Wolf Berry Ct
Lake Oswego OR 97305-1827
ppyron@cpkinder.com

Hand Delivery
 U.S. Mail, postage pre-paid
 Facsimile
 Electronic Mail

By:



Gregory M. Adams