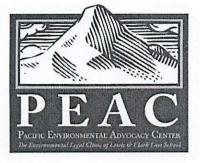


10015 SW Terwilliger Blvd Portland, OR 97219 (503) 768-6929 (503) 768-6642 abaldwin@lclark.edu www.peaclaw.org



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

Notice of Intent to Request an Issue Fund Grant 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 Notice of Intent to Request an Issue Fund Grant 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 COMMISISON OF OREGON

LC 48

)

)

)

))

)

In the Matter of PORTLAND GENERAL ELECTRIC 2009 Integrated Resource Plan SIERRA CLUB, COLUMBIA RIVERKEEPER, FRIENDS OF THE COLUMBIA GORGE, AND NORTHWEST ENVIRONMENTAL DEFENSE CENTER'S NOTICE OF INTENT TO REQUEST AN ISSUE FUND GRANT

1

Pursuant to OAR § 860-012-0100 and Section 6.2 of the First Amended and Restated Intervenor Funding Agreement ("IFA"), Sierra Club, Columbia Riverkeeper, Friends of Columbia Gorge and Northwest Environmental Defense Center ("Petitioners") hereby file this Notice of Intent to Request an Issue Fund Grant in the above-captioned docket, LC 48. Petitioners submit this Notice of Intent to notify the Oregon Public Utilities Commission ("Commission"), precertified organizations and intervenors in LC 48, that Petitioners will request intervenor funding for this proceeding.

1. On November 5, 2009, Portland General Electric ("PGE") submitted its 2009 IRP with the Commission. This filing has been docketed by the Commission as LC 48.

 LC 48 is an Eligible Proceeding under the IFA. Article 1(c) of the IFA defines an "Eligible Proceeding" as "any commission proceeding that directly affects one or more of the Participating Public Utilities." IFA Section 1(c). Docket No. LC 48 will directly affect PGE.
PGE is a Participating Public Utility under Section 1(k) of the IFA. Therefore, LC 48 is an Eligible Proceeding for which an Issue Fund Grant may be made pursuant to Section 6.1 of the IFA. 3. As required by Section 6.2 of the IFA, this Notice of Intent is being filed at the time Petitioners are requesting intervention in LC 48.

4. As required by Section 6.2, this Notice of Intent is being served on each affected Participating Public Utility, all precertified organizations, and all parties identified on the service list for LC 48.

5. Petitioners identify the PGE Issue Fund as the account from which Petitioners intend to request an Issue Fund Grant.

6. Petitioners request that the Commission establish a deadline by which Petitioners must file a proposed budget with respect to the Issue Fund Grant, as provided in Section 6.3 of the IFA.

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

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 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

LC 48 Service List

Portland General Electric	Portland General Electric
PATRICK G. HAGER	DENISE SAUNDERS
MANAGER - REGULATORY AFFAIRS	ASST GENERAL COUNSEL
121 S.W. Salmon, 1WTC0702	121 SW Salmon 1WTC1711
PORTLAND OR 97204	PORTLAND OR 97204
Patrick.hager@pgn.com	Denise.saunders@pgn.com
Northwest Independent Power Producers (W) 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

3

Northwest Energy Coalition (W)	Ecumenical Ministries of Oregon (W)
STEVEN WEISS	JENNY HOLMES
SR POLICY ASSOCIATE	ENVT'L MINISTRIES DIRECTOR
4422 Oregon Trail Ct. NE	0245 SW Bancroft, Suite B
Salem, OR 97305	Portland, OR 97239
steve@nwenergy.org	jholmes@emoregon.org
	Juoneswenioregoniorg
Ecumenical Ministries of Oregon (W)	Oregon Department of Justice
JAMES EDELSON	STEPHANIE ANDRUS
415 NE Mirimar Pl	ASST ATTORNEY GENERAL
Portland, OR 97232	Regulated Utility & Business Section
Edelson8@comcast.net	1162 Court St NE
	Salem, OR 97301-4096
	Stephanie.andrus@state.or.us
Citizen's Utility Board of Oregon (W)	Citizen's Utility Board of Oregon (W)
ROBERT JENKS	GORDON FEIGHNER
610 SW BROADWAY STE 308	610 SW BROADWAY, SUITE 308
PORTLAND OR 97205	PORTLAND OR 97205
bob@oregoncub.org	gordon@oregoncub.org
Citizen's Utility Board of Oregon (W) G. CATRIONA MCCRACKEN 610 SW BROADWAY - STE 308 PORTLAND OR 97205 catriona@oregoncub.org	
PACIFIC POWER & LIGHT (W)	PACIFICORP (W)
JORDAN A WHITE	PETE WARNKEN
SENIOR COUNSEL	MANAGER, IRP
825 NE MULTNOMAH STE 1800	825 NE MULTNOMAH - STE 600
PORTLAND OR 97232	PORTLAND OR 97232
jordan.white@pacificorp.com	pete.warnken@pacificorp.com
,	
PACIFICORP, DBA PACIFIC POWER (W)	OREGON ENVIRONMENTAL
PACIFIC POWER OREGON DOCKETS	COUNCIL (W)
825 NE MULTNOMAH STREET, STE 2000	SALLIE SCHULLINGER-KRAUSE
PORTLAND OR 97232	222 NW DAVIS ST., SUITE 309
oregondockets@pacificorp.com	PORTLAND, OR 97209
	sallies@oeconline.org