

**BEFORE THE
PUBLIC UTILITY COMMISSION OF OREGON**

UM 1182

PHASE 2

In the Matter of)
)
) CLOSING BRIEF OF THE CITIZENS'
PUBLIC UTILITY COMMISSION OF) UTILITY BOARD OF OREGON
OREGON Investigation Regarding Competitive)
Bidding.)
_____)

1 I. INTRODUCTION

2 Pursuant to the procedural schedule for this docket, the Citizens' Utility Board of Oregon
3 ("CUB") respectfully submits its Closing Brief in response to the briefs filed by PGE,
4 PacifiCorp, Idaho Power, NIPPC and Staff. ICNU did not file a Prehearing Brief.

5 The Commission identified four risks to be analyzed in Phase II of this docket¹:

- 6 1. *Cost Overrun and Underrun Risk*
7 2. *Wind Capacity Factor Risk*
8 3. *Counter-Party Risk*
9 4. *Heat-Rate Degradation Risk*

10 While CUB agrees that all four of these risks have the ability to significantly alter the bidding
11 process,² CUB continues to limit its recommendations for change through this docket to:

- 12 • *Cost Overrun and Underrun Risk* - CUB continues to recommend that
13 construction cost bid adders be put in place unless a utility can demonstrate that it has taken steps

¹ OPUC Order No. 12-324, page 4.

² UM 1182/CUB/100/Jenks-Feighner/2 at 1.

1 to remove cost overrun risk from a self build project. This is not an *either/or* proposition but a
2 recommendation for one policy whereby the Commission would require that a construction cost
3 bid adder be adopted if the utility cannot meet the demonstration requirement. Should a utility
4 be unable to meet the demonstration requirement then CUB would endorse use of a bid adder
5 such as that proposed by NIPPC. CUB would like to see bid prices that provide greater certainty
6 and shield customers from the risk of being responsible for cost over-runs.³

7 • *Wind Capacity Factor Risk* - CUB continues to endorse NIPPC's
8 recommendation that a capacity factor adder be applied to utility-owned bids for wind
9 generation, but, CUB is not prepared to accept or endorse any specific quantitative adder at this
10 time.⁴ CUB does, however, believe that NIPPC's recommendation is a step in the right direction
11 in terms of developing a methodology to correct the inherent differences between utility-owned
12 and independent resource bids. CUB believes that this adder would improve the fairness of bid
13 evaluations.

14 CUB does not believe that any party has provided sufficient evidence to necessitate a
15 change in the bid evaluation methodology to account for counterparty risk or heat rate
16 degradation risk.⁵

17 **II. PROCEDURAL BACKGROUND**

18 Following the filing of Prehearing Briefs the Procedural Schedule in this matter was
19 altered – the Hearing was cancelled⁶. For that reason CUB styles this brief as its *Closing Brief*
20 rather than as a *Posthearing Brief*.

³ UM 1182/CUB/100/Jenks-Feighner/7 at 3 – 7.

⁴ UM 1182/CUB/100/Jenks-Feighner/6 at 18 – 21 and at 7 lines 1-2.

⁵ UM 1182/CUB/100/Jenks-Feighner/7 lines 8-10.

⁶ February 8, 2013, Notice of Cancellation of Hearing.

1 **III. STATUTORY AUTHORITY**

2 **A. The Commission’s Authority to Regulate Public Utilities**

3 As discussed in CUB’s Prehearing Brief the Commission possesses wide-ranging
4 authority to ensure that the utilities conduct their procurement processes in a way designed to
5 obtain the most cost-effective mix of utility-owned and non-utility-owned generation resources
6 so as to ensure that customer rates are indeed fair and reasonable.⁷

7 **B. The Commission’s Competitive Bidding Orders and Rules**

8 In UM 1066, the Commission accepted “the premise that a bias exists in the utility
9 resource procurement process that favors utility-owned resources over PPAs.”⁸ And the
10 Commission noted that “[a]lthough these guidelines have greatly increased confidence that the
11 utility RFP process is being conducted fairly and properly, we believe further *improvements are*
12 *needed to fully address utility self-build bias.*”⁹ The Commission also asked the parties to
13 provide recommendations to improve Guideline 10(d):

14 Guideline 10(d) requires the IE to evaluate the unique risks and advantages of
15 utility benchmark resources, including consideration of the regulatory treatment if
16 construction costs and plant performance should differ from expected levels. In
17 practice, ***the IE’s evaluation of the comparative risks and advantages of utility***
18 ***benchmark resources has not met our expectations.*** When the benchmark has
19 been a natural gas resource, the evaluation has primarily focused on the terms of
20 the engineering, procurement, and construction (EPC) contract. When the
21 benchmark has been a wind resource, the evaluation has tended to focus on the
22 value of the site location after the plant’s useful life. ***We want a more***
23 ***comprehensive accounting and comparison of all of the relevant risks,***
24 ***including consideration of construction risks, operation and performance risks,***
25 ***and environmental regulatory risks. We also want more in-depth analysis of all***
26 ***of these risks.*** We invite comment on the analytic framework and methodologies
27 that should be used to evaluate and compare resource ownership to purchasing

⁷ ORS 756.040(1); *Pacific Northwest Bell v. Katz*, 116 Or. App. 302, 309 n.5 (1992) (internal quotation omitted).

⁸ Order No. 11-001, at 5.

⁹ *Id.* at 6 (emphasis added).

1 power from an independent power producer.¹⁰

2 **IV. ARGUMENT**

3 **A. The Arguments Made By Staff And The Utilities – with regard to construction and** 4 **wind capacity bid adders only.**

5 *Staff* is dismissive of all of NIPPC’s arguments in this docket¹¹ stating that NIPPC has
6 failed to establish the existence of bias supporting the need for bid adders,¹² and that its proposal
7 might therefore inappropriately create a bias in favor of the IPP bidder over the Benchmark
8 Resource.¹³ It further argues against generic adders stating that there is no “typical” IPP or
9 PPA.¹⁴ Staff concludes that NIPPC’s bid adder proposal mistakes “forecast error” for “risk
10 assessment”.¹⁵ It also states that the data set used by NIPPC was too small.¹⁶

11 *PAC* finds that “the proposed generic bid adjustments are asymmetrical in that NIPPC
12 selectively proposes that they be applied to increase the cost of only a utility-owned resources.”¹⁷
13 It also notes that “generic pre-determined bid adjustments cannot accurately account for the wide
14 ranges of variability that exist in any given RFP.”¹⁸ It further states that it “disagrees that it is
15 necessary or warranted to determine what bias exists, if any, in the current evaluation process.
16 Rather, the focus should be on ensuring that the process is fair and robust and provides a
17 transparent and objective evaluation process in the RFP.¹⁹ And it also states that the NIPPC
18 analysis is flawed because the data set is too small and relies on historic information.²⁰ It closes

¹⁰ *Id.* at 6 (emphasis added).

¹¹ Staff Prehearing Brief at 1 lines 10-15.

¹² Staff Prehearing Brief at 2 lines 2-3.

¹³ Staff Prehearing Brief at 3 lines 11-13.

¹⁴ Staff Prehearing Brief at 3 lines 21-26.

¹⁵ Staff Prehearing Brief at 5 lines 3-4.

¹⁶ Staff Prehearing Brief at 9 lines 8-10.

¹⁷ PacifiCorp’s Prehearing Brief at 6.

¹⁸ PacifiCorp’s Prehearing Brief at 7.

¹⁹ PacifiCorp’s Prehearing Brief at 9.

²⁰ PacifiCorp’s Prehearing Brief at 14.

1 by suggesting that a contract template with non-negotiable terms be developed for use in the
2 bidding process.²¹

3 *Idaho Power* states that the record developed in this docket does not demonstrated a bias
4 in favor of utility self-bids²² and that the Commission should, therefore, deny all of NIPPC's
5 requests and should instead require PPA's to include non-by-passable terms related to security in
6 their contracts.²³

7 *PGE* begins by stating that "the use of asymmetric adders introduces, rather than
8 removes, bias."²⁴ It goes on to claim in its words that "NIPPC's ad-hoc adder approach would
9 create a non-transparent and unduly complex bid review and selection process."²⁵ In its opinion
10 "improving the accuracy of the evaluation process, based on the individual characteristic of each
11 bid, is more likely to lead to a transparent, reliable and repeatable process."²⁶ In terms of the
12 arguments related to cost over-runs and Cost under-runs PGE states that NIPPC has presented
13 insufficient evidence to show bias.²⁷ It opposes NIPPC's wind capacity adder and supports
14 PacifiCorp's suggested wind capacity expert.²⁸ It also seeks adoption of non negotiable terms in
15 the template contracts.²⁹ It too thinks the sample data was taken from too small a sample³⁰ and
16 were not randomly selected.³¹ And it proposes that "any bid that includes an overall plant
17 construction cost guarantee either by the seller or by a third-party such as a qualified EPC should

²¹ PacifiCorp's Prehearing Brief at 38.

²² Idaho Power Company's Prehearing Brief at 1 lines 12-14.

²³ Idaho Power Company's Prehearing Brief at 1 lines 18-20.

²⁴ Phase II –Prehearing Brief of Portland General Electric at 3.

²⁵ Phase II –Prehearing Brief of Portland General Electric at 4.

²⁶ Phase II –Prehearing Brief of Portland General Electric at 4.

²⁷ Phase II –Prehearing Brief of Portland General Electric at 4.

²⁸ Phase II –Prehearing Brief of Portland General Electric at 5.

²⁹ Phase II –Prehearing Brief of Portland General Electric at 5.

³⁰ Phase II –Prehearing Brief of Portland General Electric at 10.

³¹ Phase II –Prehearing Brief of Portland General Electric at 11.

1 receive a higher bid score than a proposal that includes no such protection.³²

2 **B. CUB’s Arguments As To Why The Commission May Wish to Utilize Construction**
3 **Cost and Wind Capacity Factor Bid Adders for Utility Self-Build Proposals – CUB**
4 **responds to specific utility arguments only and its failure to address any argument does**
5 **not indicate agreement therewith.**

6 Notwithstanding the above arguments made by Staff and the utilities, CUB recommends
7 that bid Construction Cost and Wind Capacity Factor adders be incorporated into the Guideline
8 10(d) analysis, so that the Commission can require the IE, as part of the analysis to create an
9 RFP’s shortlist, to apply each adder to the price evaluation of any bid that would result in utility
10 ownership after commissioning the plant,³³ but for Construction Cost Adders only in the
11 circumstance where the Utility has failed to demonstrate that it has taken steps to remove cost
12 overrun risk from a self build project. As noted above, CUB does not intend this
13 recommendation to be an *either/or proposition* but a recommendation for one policy whereby the
14 Commission would require that a construction cost bid adder would be adopted if the utility
15 cannot meet the demonstration requirement. Should a utility be unable to meet the Construction
16 Cost demonstration requirement then CUB would endorse use of a Construction Cost bid adder
17 such as that proposed by NIPPC. CUB would like to see bid prices that provide greater certainty
18 and shield customers from the risk of being responsible for cost over-runs.³⁴

19 CUB’s responses to specific utility arguments follow:

- 20 1. CUB does not disagree with PacifiCorp that the RFP process should be robust and
21 transparent. In fact, CUB endorses that proposal whole heartedly. What CUB does disagree
22 with is the argument that it is not necessary or warranted to determine what bias exists. In

³² Phase II –Prehearing Brief of Portland General Electric at 22.

³³ UM 1182/NIPPC/100/Monsen/3.

³⁴ UM 1182/CUB/100/Jenks-Feighner/7 at 3 – 7.

1 fact CUB wonders how you could take care of the first problem without knowing the
2 magnitude of any existing bias (the second problem). CUB sees PAC’s proposed additional
3 investigation³⁵ as a means to delay necessary rule fixes as long as possible.

4 2. PacifiCorp’s and PGE’s recommendation of the use of a “Capacity Factor Expert” to
5 analyze all short list bids in future RFPs acknowledges the existence of the forecasting issue.
6 While CUB, like NIPPC, agrees this is a good suggestion that should be required in all
7 renewable RFPs, CUB also believes that use of such an expert would not negate the need for
8 bid adders. First, this expert would not be able to evaluate the capacity factors of all bids in
9 the RFP, and UOG bids could make it to the short list improperly.³⁶ Second, while the
10 expert may provide a best estimate of capacity factor given available information, the expert
11 would not be able to address the differential in risk of a forecasting error between a UOG
12 and IPP project. Only bid adders can fully address this risk.

13 3. Idaho Power, Portland General Electric and PacifiCorp argue that NIPPC’s historic
14 California data is not an indication of what may happen in Oregon in the future.³⁷ While
15 there is no denying this statement there is also no denying that cost over runs can happen.
16 Some projects will come in under budget and some over budget. Clearly the biggest risk to
17 consumers is from projects that come in over budget. Bid adders, in a circumstance where a
18 utility had failed to demonstrate that it has taken steps to remove cost overrun risk from a
19 self build project, will provide an additional incentive for utilities to make sure that any

³⁵ PacifiCorp’s Prehearing Brief at 9-10.

³⁶ *Id.*

³⁷ Idaho Power Company’s Prehearing Brief at 9 lines 7-9; PacifiCorp Prehearing Brief at 31; Phase II –Prehearing Brief of Portland General Electric at 17.

- 1 Benchmark projects will come in under budget.
- 2 4. Idaho Power and PacifiCorp both state that NIPPC’s evidence does not support an
3 assumption that Oregon utilities systematically under estimate construction costs.³⁸ While
4 this too is true it does not negate the fact that some projects will come in over budget. As
5 discussed above, a project coming in over budget is the bigger risk to consumers and,
6 therefore, this possibility should be recognized by the Commission with appropriate rules
7 aimed at preventing such occurrences. Bid adders, in a circumstance where a utility had
8 failed to demonstrate that it has taken steps to remove cost overrun risk from a self build
9 project, will provide an additional incentive for utilities to make sure that any Benchmark
10 projects will come in under budget.³⁹
- 11 5. PGE’s proposal to provide a higher bid score to a bid that includes an overall plant
12 construction cost guarantee does not remove the need for bid adders, in a circumstance
13 where a utility had failed to demonstrate that it has taken steps to remove cost overrun risk
14 from a self build project, because it does not eliminate all risk of cost over-runs. Even PGE
15 admits that.⁴⁰
- 16 6. Idaho Power claims that utility ability to forecast wind has improved dramatically and that
17 there is, therefore, no reason to assume that past forecasting errors will continue into the

³⁸ Idaho Power Company’s Prehearing Brief at 10 lines 1-2; PacifiCorp Prehearing Brief at pages 25-29.

³⁹ CUB also notes that Idaho Power’s claims that the evidence related to Idaho Power demonstrates that Idaho Power’s RFP process is not biased must be tempered by the fact that Idaho Power has not always seen fit to participate in Oregon’s RFP process and thus parties and the Commission have not been able to scrutinize its investments in the same manner as it does with other Oregon utilities. UE 248 *In the Matter of Idaho Power Company General Rate Revision Application for the Authority to Include the Langley Power Plant Investment in Rate Base*, Order 12-358 pages 3-4 issued September 20, 2012.

⁴⁰ Phase II –Prehearing Brief of Portland General Electric at 23.

1 future.⁴¹ While CUB hopes that this is true forecasting is an inherently risky business and as
2 CUB argued in its Prehearing Brief “utilities have an incentive to forecast wind availability
3 near the highest level of the forecast range, while independent power producers have an
4 incentive to forecast availability near the lowest level of the forecast range.”⁴² It is CUB’s
5 continued position that a wind capacity factor adder will help account for this fundamental
6 difference thus leveling the playing-field and protecting customers from the potential for
7 increased costs to customers resulting from lower-than-expected generation.⁴³

8 In closing, CUB recommends that the Commission adopt bid adders like those proposed
9 by NIPPC for Construction Costs in circumstances where a utility has failed to demonstrate that
10 it has taken steps to remove cost overrun risk from a self build project. CUB makes this
11 recommendation with the caveat that while NIPPC recommends specific bid adders for the initial
12 construction cost and for the first five years of a plant’s operations, CUB has some concerns that
13 it is difficult to calculate one specific adder that represents all potential contract terms. A utility
14 with a fixed-cost construction contract might have a different adder than one with a variable-cost
15 contract. It may be that a bid adder range can be provided to the IE, or that the Commission can
16 set one based on the difference in rights associated with the self-build proposed contracting
17 versus the short list options. CUB endorses NIPPC’s recommendation that a capacity factor
18 adder be applied to utility-owned bids for wind generation, NIPPC’s recommendation is a step
19 in the right direction in terms of developing a methodology to correct the inherent differences
20 between utility-owned and independent resource bids. CUB believes that this adder would

⁴¹ Idaho Power Company’s Prehearing Brief at 17 line 18 to page 18 at line 2.

⁴² CUB Prehearing Brief at 11 lines 18-20.

⁴³ CUB Prehearing Brief at 12 lines 1-5.

1 improve the fairness of bid evaluations even though CUB is not prepared to accept or endorse
2 any specific quantitative adders at this time.⁴⁴

3 **C. Arguments Related to Heat Rate.**

4 CUB appreciates PAC’s willingness to work with Staff and independent third-party
5 experts to make the Heat Rate Degradation element of the analysis more thorough and
6 transparent.

7 **D. Arguments Opposed to the Counter-Party Risk Adder**

8 CUB acknowledges that there is some degree of counter-party risk involved with
9 independent generation projects. However, CUB agrees with NIPPC Witness Camden Collins in
10 her assessment that no compelling case has been made by the utilities to show that counter-party
11 risk, financial or otherwise, should be a significant factor in bid evaluation.⁴⁵ If a sound
12 methodology for assigning values to credit differentials can be developed, CUB would welcome
13 its inclusion in the bid evaluation process.⁴⁶

14 **V. CONCLUSION**

15 Construction Cost bid adders are warranted for “cost-plus” utility resources in
16 circumstances where the utility has failed to demonstrate that it has taken steps to remove cost
17 overrun risk from a self build project. Wind Capacity Factor Error adders are also warranted and
18 would improve the fairness of bid evaluations. Given the Commission’s broad statutory
19 authority, the Commission has the ability, and the responsibility, to find that the current
20 Competitive Bidding Guidelines do not always adequately account for the significant risk of

⁴⁴ UM 1182/CUB/100/Jenks-Feighner/6 at 18 – 21 and at 7 lines 1-2.

⁴⁵ UM 1182/NIPPC/200/Collins.

⁴⁶ UM 1182/CUB/100/Jenks-Feighner/5 lines 13-18.

1 Construction Cost Overruns and Wind Capacity Factor errors. As things stand, a prudent IPP
2 must incorporate the potential cost associated with these risks into its fixed price RFP bid for a
3 PPA structure, but a utility does not have to. Without mandatory bid adders for Wind Capacity,
4 and for Construction Costs in the circumstance where a utility has failed to demonstrate that it
5 has taken steps to remove cost overrun risk from a self build project, a “cost-plus” UOG bid
6 could easily ignore these risks and an IE would have no basis to fault the bid. This would result
7 in the continuation of the passing of these increased costs onto customers.

8 CUB respectfully requests that the Commission revise the Guideline 10(d) analysis to
9 require bid adders for Wind Capacity Factor Errors and to require Construction Cost Overrun
10 Bid Adders - in the circumstance where a utility had failed to demonstrate that it has taken steps
11 to remove cost overrun risk from a self build project.

Dated this 11th day of March, 2013.

Respectfully submitted,



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UM 1182 CERTIFICATE OF SERVICE

I hereby certify that, on this 11th day of March, 2013, I served the foregoing **CLOSING BRIEF OF THE CITIZENS' UTILITY BOARD OF OREGON** in docket UM 1182 upon each party listed in the UM 1182 PUC Service List by email and, where paper service is not waived, by U.S. mail, postage prepaid, and upon the Commission by email and by sending one original and five copies by U.S. mail, postage prepaid, to the Commission's Salem offices.

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