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Oregon Public Utility Commission  
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RE: Portland General Electric (Docket # UP349)

Dear Oregon Public Utility Commissioners:

The contingent sale of Portland General Electric's Port Westward bulk oil infrastructure (tanks, pipelines, land, permits, and enhanced rail access) to Cascade Kelly Holdings LLC (a subsidiary of Global Partners LP) is problematic for PGE, its customers, and Oregon residents for several reasons:

1. It transfers the operational liability associated with this "tank farm" to an entity with little Oregon history and nowhere near the fiscal strength and corporate responsibility that PGE has exhibited over the years. PGE operated and ultimately decommissioned the Trojan nuclear plant with skill and attention to detail. There are a lot of questions around Global's operational history and capacity to cover all potential liabilities from oil transferred and held on site.
2. The land on which the tank farm sits is classed in DOGAMI mapping in the highest risk category for a Cascadia subduction zone earthquake. With what we now know about the risk of an earthquake on this site, it makes no sense to continue to store bulk quantities of oil on highly unstable liquification-prone ground right next to the Columbia River. If there were a compelling state or national interest to continue to use bulk oil/ethanol tanks on this site (which I don't believe outweigh the risks) scrapping out the old tanks and doing a thorough vetting of a safe way to build out this infrastructure with modern technology and engineering insights seem ultimately preferable for all concerned (the parties to the sale, the public, and the fragile Columbia River environment).
3. The oil tanks are long in the tooth and are, at least as viewed from the perspective of Erickson Dike Road, in mixed condition at best. They appear near the end of their safe use cycle. There have been leakage issues that recently required PGE to excavate and remove significant volumes of soil. The pads these tanks sit on are not 21<sup>st</sup> century design and the containment berms probably aren't adequate for an earthquake. This is an old infrastructure.

4. Were there to be a significant Bakken oil or ethanol explosion on the site, it would potentially damage and knock out PGE's adjacent gas-fired power turbines' key functional elements from direct pollution of the fire and even plant conflagration. This would be a disaster for both PGE and regional electric power consumers with a very real chance of brownout/blackout west of the Cascades and beyond. This risk isn't hypothetical. We had a modest ethanol fire that only involved a couple of rail tanker cars at the intersection of Highway 30 and Cornelius Pass road several years ago. Emergency responders couldn't get near the fire for a considerable time and had to let it burn down while trying to keep the flames from spreading. Highway 30 was shut about five+ hours. Only two of the 12 cars were involved. It could easily have been far worse. In the middle of a tank farm, it would be a nightmare.

Thank you for considering these comments. This is a moment when broader considerations need to inform your decision on what, on its surface, seems a simple business transaction. It isn't simple. Ironically, I believe that in the end, PGE and its customers would breathe easier if the tanks were scrapped out. But somehow, PGE was convinced that it was in their best interest to take some money, **possibly** shift the liability, and hope for the best. That seems odd with the investments they have made at Port Westward. This sale isn't clean and it isn't the way they usually do business in Oregon. The risk from this aging infrastructure on a highly sensitive site needs to be taken care of, not transferred to a questionable out of state company for a quick buck.

Sincerely,

Chip Bubl