

EXECUTIVE COMMITTEE

PRESIDENT AND CHAIR
JONAE ARMSTRONG
WASHINGTON SQUARE

SECRETARY
JACK ORCHARD
BALL JANIK LLP

TREASURER
STEVE CLARK
COMMUNITY NEWSPAPERS

JIM EDWARDS
BIRTCHEER PROPERTY SERVICES

MATT FELTON
FELTON PROPERTIES INC

DICK LOFFELMACHER
PACTRUST

ED TROMPKE
JORDAN SCHRADER RAMIS PC

DIRECTORS

MORGAN ANDERSON
INTEL

FRANK ANGELO
ANGELO PLANNING GROUP

STEVE BARRAGAR
HARSCH INVESTMENT PROPERTIES

DAVID BENNETT
LANDYE BENNETT BLUMSTEIN LLP

JEFF BORLAUG
NAI NORRIS BEGGS & SIMPSON

LOIS DITMARS
PETERKORT TOWNE SQUARE

NORM EDER
CONKLING FISKUM & MCCORMICK

MARK FISHER
STANCORP MORTGAGE INVESTORS LLC

RICH FOLEY
UMPQUA BANK

MIKE GRANT
KAISER FOUNDATION
HEALTH PLAN OF THE NW

ALEX JACKSON
PROVIDENCE HEALTH & SERVICES

KYLE LATTA
KG INVESTMENT MANAGEMENT LLC

ALEX MILLER
NW NATURAL

TIM PARKER
THE MELVIN MARK COMPANIES

JIM PETSCH
NIKE, INC.

DAVE ROBERTSON
PORTLAND GENERAL ELECTRIC

TOM BRIAN, CHAIRMAN
WASHINGTON COUNTY

MAYOR CRAIG DIRKSEN
CITY OF TIGARD

MAYOR DENNY DOYLE
CITY OF BEAVERTON

MAYOR LOU OGDEN
CITY OF TUALATIN

MAYOR JERRY WILLEY
CITY OF HILLSBORO

JONATHAN SCHLUETER
WESTSIDE ECONOMIC ALLIANCE

SUSTAINING MEMBERS

COMCAST
FELTON PROPERTIES INC.
FRED MEYER STORES
GENENTECH
INTEL
KAISER FOUNDATION
HEALTH PLAN OF THE NW
KG INVESTMENT MANAGEMENT LLC
THE MELVIN MARK COMPANIES
NIKE, INC.
PACTRUST
PORTLAND GENERAL ELECTRIC
PROVIDENCE HEALTH & SERVICES
PS BUSINESS PARKS
SOLARWORLD
THE STANDARD
VERIZON NORTHWEST
WASHINGTON SQUARE



May 12, 2010

Hand Delivered

Public Utility Commission of Oregon
550 Capitol Street NE #215
P.O. Box 2148
Salem Oregon 97308-2148

Commissioners:

Re: In Consideration of Portland General Electric Company's
2009 Integrated Resource Plan Docket # LC 48

Enclosed are an original and a copy of Westside Economic Alliance's Motion to Intervene Out of Time and Petition to Intervene in the proceeding referenced above.

Also enclosed is a supporting letter, written and co-signed by the Beaverton, Hillsboro and Tualatin Chambers of Commerce, outlining the importance and implications of this case for the residents and businesses served by Westside Economic Alliance and our business affiliates in these communities.

Sincerely,

Jonathan F. Schlueter
Executive Director

10220 SW Nimbus Avenue, Suite K-12, Tigard, Oregon 97223

Phone: 503-968-3100 □ Fax: 503.624-0641 □ E-mail: westside@westside-alliance.org □ URL: www.westside-alliance.org

BEFORE THE OREGON PUBLIC UTILITY COMMISSION

LC 48

In the matter of Portland General Electric
2009 Integrated Resource Plan filing

MOTION TO INTERVENE
OUT OF TIME

The Westside Economic Alliance hereby moves for permission to intervene out of time. Westside Economic Alliance's Petition to Intervene is attached to this Motion.

Granting this petition for late intervention will not broaden the issues, burden the record or unreasonably delay the proceeding nor prejudice the rights of other parties to the proceeding.

Westside Economic Alliance will be commenting on Portland General Electric Company's Boardman 2020 Plan portion of the 2009 Integrated Resource Plan filing, an existing issue. These comments will also include supporting letters and statements on behalf of the Beaverton, Hillsboro and Tualatin Chambers of Commerce, and an economic profile of the region we serve.

As a Portland General Electric Company customer, and as the regional trade association serving 150 businesses, communities and public agencies served by the utility, we have a strong interest in ensuring that the Boardman 2020 Plan receives a thorough and complete vetting and ensuring that our comments are given appropriate consideration in the official record of the proceeding.

Dated: May 12, 2010



Jonathan F. Schlueter
Executive Director
Westside Economic Alliance

BEFORE THE OREGON PUBLIC UTILITY COMMISSION

LC 48

In the matter of Portland General Electric
2009 Integrated Resource Plan filing

A PETITION TO INTERVENE

NAME OF PETITIONER: Westside Economic Alliance
ADDRESS: 10220 S.W. Nimbus Avenue Suite K-12
Tigard, Oregon 97223
PHONE NUMBER: (503) 968-3100
FAX NUMBER: (503) 624-0461
E-MAIL ADDRESS: jschlueter@westside-alliance.org

PLEASE SEND COPIES TO:

Westside Economic Alliance, a 501 (c) 6 trade organization serving 150 employers, developers and commercial property managers, local communities and regional public agencies serving the residents and businesses located in Washington and western Clackamas counties, by promoting business growth and economic development in this region.

NATURE AND EXTENT OF THE PETITIONER'S INTEREST IN THE PROCEEDING:

Westside Economic Alliance will be commenting on Portland General Electric Company's Boardman 2020 Plan portion of the 2009 Integrated Resource Plan filing, an existing issue. These comments will also include supporting letters and statements on behalf of the Beaverton, Hillsboro and Tualatin Chambers of Commerce, and an economic profile of the region we serve.

As a Portland General Electric Company customer, and as the regional trade association serving 150 businesses, communities and public agencies served by the utility, we have a strong interest in ensuring that the Boardman 2020 Plan receives a thorough and complete vetting and ensuring that our comments are given appropriate consideration in the official record of the proceeding.

THE ISSUES THE PETITIONER INTENDS TO RAISE AT THE PROCEEDING:

None specifically. However, our comments will not broaden the issues, burden the record, or unreasonably delay the proceeding.

ANY SPECIAL KNOWLEDGE OR EXPERTISE OF THE PETITIONER THAT WOULD ASSIST THE COMMISSION IN RESOLVING THE ISSUES IN THE PROCEEDING:

None specifically.

Based on the information provided above in accordance with the Commission's rules of procedure, I request to participate in this proceeding as an intervener. I, or the organization that I represent, will not unreasonably broaden the issues, burden the record, or unreasonably delay the proceeding. OAR 860-013-0021.

Pursuant to OAR 860-013-0070 (4), Petitioner hereby agrees to accept service by electronic mail and waives other forms of service provided in OAR 860-013-0073.



Jonathan F. Schlueter
Executive Director
Westside Economic Alliance

May 12, 2010
May 12, 2010

CERTIFICATE OF SERVICE

I hereby certify that I have this day caused the foregoing **MOTION TO INTERVENE OUT OF TIME** and **PETITION TO INTERVENE** to be served by electronic mail to those parties whose email addresses appear on the attached service list, and by First Class US Mail, postage prepaid and properly addressed, to those parties on the attached service list who have not waived paper service from OPUC Docket No. LC 48.

May 12, 2010



Jonathan Schlueter
Executive Director
Westside Economic Alliance

EXECUTIVE COMMITTEE

PRESIDENT AND CHAIR
JONAE ARMSTRONG
WASHINGTON SQUARE

SECRETARY
JACK ORCHARD
BALL JANIK LLP

TREASURER
STEVE CLARK
COMMUNITY NEWSPAPERS

JIM EDWARDS
BIRTCHEER PROPERTY SERVICES

MATT FELTON
FELTON PROPERTIES INC

DICK LOFFELMACHER
PACTRUST

ED TROMPKE
JORDAN SCHRADER RAMIS PC

DIRECTORS

MORGAN ANDERSON
INTEL

FRANK ANGELO
ANGELO PLANNING GROUP

STEVE BARRAGAR
HARSCH INVESTMENT PROPERTIES

DAVID BENNETT
LANDYBENNETT BLUMSTEIN LLP

JEFF BORLAUG
NAI NORRIS BEGGS & SIMPSON

LOIS DITMARS
PETERKORT TOWNE SQUARE

NORM EDER
CONKLING FISKUM & MCCORMICK

MARK FISHER
STANCORP MORTGAGE INVESTORS LLC

RICH FOLEY
UMPQUA BANK

MIKE GRANT
KAISER FOUNDATION
HEALTH PLAN OF THE NW

ALEX JACKSON
PROVIDENCE HEALTH & SERVICES

KYLE LATTA
KG INVESTMENT MANAGEMENT LLC

ALEX MILLER
NW NATURAL

TIM PARKER
THE MELVIN MARK COMPANIES

JIM PETSCHKE
NIKE, INC.

DAVE ROBERTSON
PORTLAND GENERAL ELECTRIC

TOM BRIAN, CHAIRMAN
WASHINGTON COUNTY

MAYOR CRAIG DIRKSEN
CITY OF TIGARD

MAYOR DENNY DOYLE
CITY OF BEAVERTON

MAYOR LOU OGDEN
CITY OF TUALATIN

MAYOR JERRY WILLEY
CITY OF HILLSBORO

JONATHAN SCHLUETER
WESTSIDE ECONOMIC ALLIANCE

SUSTAINING MEMBERS

COMCAST
FELTON PROPERTIES INC.
FRED MEYER STORES
GENENTECH
INTEL
KAISER FOUNDATION
HEALTH PLAN OF THE NW
KG INVESTMENT MANAGEMENT LLC
THE MELVIN MARK COMPANIES
NIKE, INC.
PACTRUST
PORTLAND GENERAL ELECTRIC
PROVIDENCE HEALTH & SERVICES
PS BUSINESS PARKS
SOLARWORLD
THE STANDARD
VERIZON NORTHWEST
WASHINGTON SQUARE



May 12, 2010

Oregon Public Utility Commission
550 Capitol Street NE Suite 215
Salem, Oregon
97301-2551

Chairman Ray Baum, Commissioners Susan Ackerman and John Savage:

Subject: Docket LC 48 Portland General Electric Company's
2009 Integrated Resource Plan

The Westside Economic Alliance, a regional business advocacy organization promoting employment growth and economic development in Washington and western Clackamas Counties, requests OPUC to acknowledge Portland General Electric's proposed actions for early closure of the Boardman coal-fired generating facility as described in the 2009 Integrated Resource Plan Addendum.

Our organization represents 150 employers, developers and property managers, local communities and public agencies, primarily served by PGE on the Westside of the Portland metropolitan region. These members include many of the largest ratepayers and electrical energy users in the state of Oregon. A partial list of these public and private sector members is shown here in the margin.

WEA members depend on local utilities to supply reliable, abundant, affordable electrical energy to our fast-growing region. In return, the Westside provides job opportunities for a quarter million Oregonians, and accounts for more than 30% of our state's manufacturing base.

These jobs and payrolls bankroll the State of Oregon, by contributing one of every six personal income tax dollars collected to run our State. So for those of us who recognize the importance of offering public education in Pendleton; agree with the need to provide public health care services in Ontario; or being able to support public safety in Klamath Falls, as examples, it is important to realize these services are paid for and made possible by a job and a payroll on the Westside of the state, and on the Westside of the Portland metro region.

WEA applauds the Oregon Public Utility Commission for your agency's Mission Statement, and the need to *"Ensure that safe and reliable utility services are provided to consumers at just and reasonable rates while fostering the use of competitive markets to achieve these objectives."*

To that end, our organization teamed with 17 allied business groups in western Oregon in a joint statement to OPUC on April 26, expressing support for PGE's Integrated Resource Plan Addendum, and the proposed closure of the Boardman facility in 2020, but no sooner. We do so again here, with a joint letter from the Beaverton, Hillsboro, and Tualatin Chambers of Commerce (copy enclosed).

10220 SW Nimbus Avenue, Suite K-12, Tigard, Oregon 97223

Phone: 503-968-3100 □ Fax: 503.624-0641 □ E-mail: westside@westside-alliance.org □ URL: www.westside-alliance.org

As Oregonians, we are privileged to have the opportunity to consider a wide variety of energy options and alternatives for our state. But we shouldn't have to be reminded of the dreadful fact that our state has led the national unemployment rate for 168 consecutive months—14 years running---at a tremendous cost to the livability and quality of life we claim for our state.

With a current estimate of 208,000 Oregonians desperately seeking to return to our state's workforce and the chance to contribute to the economic recovery of our state, Westside Economic Alliance urges your Commission and all state agencies to work with our members to restore economic health to our communities and improve the quality of life for all Oregonians. To be successful, we must be judicious and reasonable about the regulatory burdens and costly compliance demands we impose on the businesses, ratepayers and residents of our state.

Critics of the Boardman coal-fired generating facility have demanded that PGE finance extensive new pollution controls imposing additional operating costs that could eventually exceed \$600 million – the bulk of which would be paid by businesses and public agencies in Oregon's most populated counties.

Others demand the Boardman facility be closed by 2014—if not sooner---with little or no apparent consideration about where the utility should purchase and supply electrical energy from alternative sources—whether nuclear, hydro, or coal-fired facilities in other states---and with little attention to the attendant costs---economically or environmentally---for producing this energy. Such demands would force the utility to secure power from other sources, with far less certainty about availability, reliability or pricing for Oregon ratepayers.

Alternatively, the utility has proposed to close the Boardman facility as early as 2020, and is actively studying the feasibility of converting the facility or replacing it with generating capacity fueled by natural gas, biomass fuels, expanded wind power, and other sources. Each of these alternative technologies deserve consideration, and will get this attention if we allow our state's economy to rebuild and recover, and permit a phased in transition.

PGE has demonstrated that its proposal doesn't raise the lifetime pollution or operating costs of the plant compared to alternate strategies, is consistent with OPUC's Mission Statement, and the interests of Oregon ratepayers. We don't anticipate significant risk by your acceptance of PGE's proposal, but we can foresee considerable and unnecessary risks for utility customers if more immediate demands are placed on the Boardman facility.

Westside Economic Alliance thanks you for your attention to our concerns, and appreciates your consideration of our ideas.

Sincerely,



Jonathan Schlueter
Executive Director

May 12, 2010

LC 48 Comments on Portland General Electric's IRP

Public Utility Commission
Attn: Filing Center
550 Capitol Street NE #215
PO Box 2148
Salem, OR 97308

As representatives of the business communities in the Beaverton, Hillsboro, and Tualatin areas, the undersigned chambers of commerce ask that the Oregon Public Utility Commission accept Portland General Electric's proposal to close the Boardman generating plant in 2020, and that the commission reject the proposal to close the plant by 2014.

PGE has demonstrated that a closure of the plant in 2020 would have the least cost to customers, including our members, than any other course of action, including operating the plant to the year 2040.

As PGE customers, our members would suffer an unnecessary economic burden if the 2014 option is adopted.

- It would cost PGE customers hundreds of millions of additional dollars, because it would not give PGE adequate time to find alternative sources of power. As business people, we understand, very well, the economics of securing short-term supplies on the open market.
- This burden would come at the worst possible time, as employers, including our members, struggle out of a deep economic recession.
- Additional utility costs would be one more factor preventing our members from hiring employees and helping our communities grow out this severe economic downturn.

Many companies have closed because they cannot make adequate income to cover their costs of business. Many others are on the edge, ready to shutdown if their costs go any higher. Please do not let the unnecessary expense of a poorly timed Boardman shutdown become the "last straw."

Our members, like all Oregonians, are also concerned about the environment. We note that environmental requirements are driving PGE's proposal; the 2020 plan maximizes environmental benefits while minimizing costs. By closing the plant 20 years ahead of its planned retirement date, overall emissions are reduced.

Thank you for considering this plea. In recent years our members have been battered by a plummeting economy, tax increases and rising energy prices. Please don't add another unnecessary cost.

/s/

*Beaverton Area Chamber of Commerce
Greater Hillsboro Area Chamber of Commerce
Tualatin Chamber of Commerce*

	Clackamas	Multnomah	Washington	Oregon / U.S.
Resident Population (July 1, 2008)	380,576	714,567	529,216	3,790,060
Total non-farm employment: Public and Private Sectors (March 2010)	133,600	420,800	226,000	1,590,400
Percentage of resident work force who are currently unemployed (March 2010)	10.4%	10.1%	9.0%	10.6% (Oregon) 9.7% (U.S.)
Adjusted Gross Income (2007 tax returns)	\$11.9 billion (12.1% of statewide totals) (25.2% of tri-county totals)	\$19.125 billion (19.4% of statewide totals) (40.4% of tri-county totals)	\$16.2 billion (16.4% of statewide totals) (34.3% of tri-county totals)	\$98.7 billion
State Income Taxes Paid (2007 tax returns)	\$703.5 million (12.6% of statewide totals) (24.9% of tri-county totals)	\$1.1 billion (20.0% of statewide totals) (39.7% of tri-county totals)	\$999.4 million (17.8% of statewide totals) (35.4% of tri-county totals)	\$5.6 billion
Median Household Income (2008)	\$66,122	\$51,393	\$65,625	\$50,165 (Oregon) \$52,029 (U.S.)
Average age of county residents	38.9 years	36.9 years	35.0 years	36.4 years
Education attainment levels:				
High School Diploma or GED among residents age 25 or older	90.7%	87.9%	90.1%	84.0% U.S. Average
Bachelor's degree or higher among residents age 25 or older	30.9%	35.1%	37.4%	27.0% U.S. Average
Note: The figures reported in blue-colored font represent all-time record highs				
Sources:				
U.S. Census Bureau	WorkSource Oregon			Updated: 4/21/10
Portland State Center for Urban Studies	Oregon Dept. of Revenue			

Prosperity and Poverty in Oregon

	Clackamas	Clark	Multnomah	Washington	Yamhill
Median household income (2008)	\$66,122	\$59,194	\$51,393	\$65,625	\$64,889
Average Wage Per Job (2008)	\$41,145	<i>(pending)</i>	\$45,992	\$51,134	\$34,258
Percent Receiving Food Stamps	6%	9%	12%	7%	10%
Unemployment Rate March 2010	10.4%	14.6%	10.1%	9.0%	10.6%
Jobs lost since March 2009	-5,100	-6,000	-14,300	-8,200	-260

Sources: U.S. Census Bureau
 WorkSource Oregon
 Daily Columbian

Updated: April 21, 2010