

**BEFORE THE PUBLIC UTILITY COMMISSION OF OREGON**

**LC 48**

In the Matter of )  
PORTLAND GENERAL ELECTRIC CO. )  
2009 Integrated Resource Plan ) **Comments**  
 ) **of the**  
 ) **Ecumenical Ministries**  
 ) **of Oregon**

**Comments on PGE’s Integrated Resource Plan**  
**Ecumenical Ministries of Oregon**

**I. Introduction**

Ecumenical Ministries of Oregon (EMO) and its Oregon Interfaith Power and Light project appreciate this opportunity to comment on Portland General’s Integrated Resource Plan, as amended (IRP or “Plan”). EMO greatly appreciates the openness with which PGE has considered and put forth a plan for an early shutdown of the Boardman Coal Plant, the largest stationary source of global warming pollution in Oregon. The opportunity for Oregon to undertake this historic transition to its clean energy future by addressing this particular facility cannot be overstated. The fact that this clean energy opportunity dovetails with an opportunity for PGE’s ratepayers to save over \$500,000,000 in retrofitting an outdated electrical generating technology clarifies the decision points in this docket even further. In 2009, EMO met with diverse parties that have a stake in the Boardman Coal Plant to gain a fuller understanding of the environmental, economic and social implications of various proposals under consideration for plant. We support a transition from coal, or a shutdown, no later than 2020 because it addresses our concerns for many aspects of the common good, including the well-being of workers and the local community, utility rates and stewardship of God’s creation.

**II. Does PGE’s IRP ask the right question?**

The IRP seems to be asking the question: If 2020 is the proposed date to end coal-fired electrical generation at Boardman, what is the least cost alternative if PGE cannot meet a 2020 deadline? The IRP’s conclusion is that it must operate Boardman until 2040 if it cannot get waivers of air pollution regulations in time to make the 2020 deadline. The expressed desire to make the coal alternative primary for the company, and shift significant risks to customers and to the health of our air, land and water is ethically troubling.

In our opinion the correct question, which PGE did not analyze, is how can PGE minimize the risk exposure of making the wrong decision on an investment in Boardman? That plan, which is based on straightforward critical path analysis, would have been much more helpful to the OPUC and the interveners in evaluating the IRP, and would be informative in evaluating a range of Boardman closure dates between 2015 and 2020 that reflect actual developments in obtaining regulatory relief from MACT requirements.

**III. Does PGE make reasonable assumptions about what the future holds for growth in electrical demand?**

Our answer to the above question is “no.” Much of the IRP-calculated need to keep Boardman operating in the absence of a 2020 shutdown is based on an assumed load growth until 2030 of 2.22 percent annually offset by energy efficiency of 0.31 percent. The magnitude of the

divergence of both of these numbers from the Northwest Power Planning Council's Sixth Power Plan in breathtaking. PGE's growth figure overstates the Sixth Plan's load growth forecast for Oregon a stunning 79 percent. And, perhaps only coincidentally, the PGE's energy savings figure also understates the Sixth Plan's energy saving forecast for Oregon by a factor of three. Taken together, the PGE load forecast falls outside the realm of any recognizable energy future for the service territory. And both the Sixth Plan's moderate forecast and PGE's extreme forecast have been undertaken prior to three major policies that have been adopted, all incorporating unanticipated actions that will reduce electricity consumption.

1. Oregon's SB 79 calls for mandatory energy consumption reductions to 10 to 25 percent by 2012 in building codes for new construction for both residential and commercial structures.
2. Spending by the American Recovery and Reinvestment Act that has already led to program and infrastructure support for accelerated energy consumption reduction throughout the PGE service territory.
3. Approval by City Council of the Portland Climate Action Plan that begins planning and administrative action for significant measurable reductions of electricity consumption by 2030 within Portland city limits. Any progress at all toward the targets of this plan will lead to load shrinkage within a large portion of PGE's service territory; this is a world apart from PGE's forecast of 2.2% per year load growth.

#### **IV. Conclusion**

It would be counterproductive for the OPUC to approve an alternative plan that relies on a significant investment in the Boardman plant. The OPUC would have to accept two highly questionable assumptions to approve the Diversified Thermal with Green alternative:

1. PGE is incapable of a critical path analysis approach to this decision.
2. Load growth of an of an unrecognizable future should be the basis for this investment.

We had sensed that when PGE first came forth with the initiative to not foist an inappropriate Boardman investment onto its customers, the company would be sincere in its recognition that current investment futures might not parallel past investment futures. We still think PGE is sincere in legitimately providing the least-cost, least-risk future for its customers. We hope the IRP in this docket evolves to reflect this sincerity.

Dated this nineteenth day of May, 2010

Respectfully Submitted,

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May 19, 2010

Re: Ecumenical Ministries of Oregon's Comments on the matter of Portland General Electric Companies Integrated Plan Docket No. LC 48

The following individuals and entities were notified of Ecumenical Ministries of Oregon's comments on the above captioned matter by e-mail or mail as requested.

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