



**Association of
Oregon Counties**

October 26, 2010

OPUC Chairman Ray Baum
OPUC Commissioner Susan Ackerman
OPUC Commissioner John Savage

Dear Oregon Public Utility Commissioners,

The Association of Oregon Counties, an intervenor in LC 48, represents the interests of counties. We have been a strong supporter of PGE's BART III (Boardman 2020) proposal, which fairly balances the needs of the environment, costs for ratepayers within PGE's service territory and the local communities surrounding the Boardman Power Plant.

With respect to the Public Utility Commission staff recommendation, we offer the following comments.

We strongly support Commission acknowledgement of PGE's 2020 plan for the Boardman Power Plant as part of the Integrated Resource Plan (IRP). In light of the various interests and objectives that must be balanced in order to achieve a workable solution going forward, including environmental, economic and community, it's clear that a reasonable 2020 plan best incorporates and supports those important goals.

In addition, we support the staff recommendation that a closure of the Boardman Power Plant in the 2015/2016 is unrealistic. Acquiring reliable replacement resources in such a short time frame, which would jeopardize PGE's responsibility to provide reliable electric service at a reasonable cost to ratepayers, is unrealistic. In addition, it does nothing to take into account the need to transition the communities and jobs around the Boardman Power Plant that would be impacted by such an early closure of the facility. This option deserves no further consideration.

Finally, we encourage the Commission to acknowledge a 2040 "backstop," which is the current actionable rule, if a reasonable 2020 plan substantially similar to BART III is not approved by the Environmental Quality Commission. To do otherwise creates additional uncertainty for the economy and communities struggling in the current economic environment. Staff has recommended that PGE submit an updated IRP including 2040 if EQC does not adopt a reasonable 2020 Plan; including a 2040 now simply avoids the need for delay or uncertainty should the EQC not approve PGE's BART III. We believe acknowledging a 2040 "backstop" at this stage is appropriate.

Thank you for the opportunity to comment and for the good work of staff in recommending a reasonable, balanced path forward for the Boardman Power Plant.

Sincerely,

A handwritten signature in cursive script that reads "Mike McArthur".

Mike McArthur
Executive Director, Association of Oregon Counties

CERTIFICATE OF SERVICE

I hereby certify that I have this day caused COMMENTS 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.

Dated at Salem, Oregon, this 26 day of October, 2010.



Mike McArthur
Executive Director
Association of Oregon Counties

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