



IBEW Local 125

International Brotherhood of Electrical Workers

August 30, 2010

Public Utility Commission of Oregon
550 Capitol Street NE #215
PO Box 2148
Salem, OR 97308-2148

Dear Commissioners:

The International Brotherhood of Electrical Workers (IBEW) Local 125 represents approximately 3,600 members, nearly 2,200 Oregonians, who work in the electric utility industry throughout the Pacific Northwest. As an intervenor in LC 48, Local 125 strongly urges the Commission to approve a plan that allows operation throughout 2020 but preferably until 2040 and beyond.

Local 125 recognizes Portland General Electric's (PGE) good-faith attempt to create a workable solution that balances the needs of ratepayers, wants of the environmentalists, and its obligation as a majority owner to meet regulatory and legislative requirements; however, our concerns are for the jobs provided by—directly and indirectly—the plant and the communities which surround it. The Boardman Coal-fired plant employs 110 permanent workers, 80 of which are members of Local 125 and nearly 225 seasonal workers. As a 585-megawatt-generation facility, the plant is one of PGE's least cost power sources and among its most reliable. To meet demand, PGE must maintain a balanced energy portfolio, and coal is part of that mix.

While PGE's 2020 plan may be reasonable, the overwhelming issue remains. Is it prudent to displace families from jobs and communities at a time when Oregon's businesses are struggling throughout the state? There is no doubt that PGE needs firm answers on its 2020 plan to ensure it can order, install, and test new equipment, and one should be given. We seek time beyond 2020, so the company can invest in research and development as well as engineering that will identify alternative fuel sources for the plant. The company's chief executive officer has announced authorization of funds that will pursue new fuel sources, and when successful, not only will PGE maintain operation of its reliable generation facility but will have renewed hope and opportunity in an economically depressed area.

PGE is willing to invest in pollution controls. Although unknowns remain regarding carbon taxes, legislation, and regulation, Oregon still needs reliable, reasonably priced, and safely generated power. Operation of the Boardman Coal-fired Plant will help minimize the historic disproportionate economic impacts to rural Oregon. Allow time for technology to be developed and/or refined.

Finally, please remember that Oregon has traveled this path previously. No one denies the importance of maintaining the innovative thinking that has made Oregon a leader in

environmental policy, but one must question the cost. Let's avoid allowing the timber industry collapse from occurring in the energy industry. This one plant is not the source of all things wrong with the environment, and it can certainly help make things right to promote future economic growth while preventing additional difficulties.

In summary, Local 125 supports operation of the Boardman Coal-fired Plant until 2040 and beyond with nothing less than 2020 as a backstop. Thank you for your consideration.

Sincerely,

A handwritten signature in cursive script that reads "Marcy Putman". The signature is written in black ink and is positioned above the printed name.

Marcy Putman
Political Affairs Representative
IBEW Local 125

LC 48 - CERTIFICATE OF SERVICE

I hereby certify that, on August 30, 2010, I served the foregoing **RESPONSE COMMENTS OF THE JOINT PARTIES** in docket LC 48 upon each party listed in the LC 48 OPUC 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 an original and one copy by U.S. mail, postage prepaid, to the Commission's Salem offices.

Sincerely,

A handwritten signature in cursive script that reads "Marcy Putman". The signature is written in black ink and is positioned above the printed name.

Marcy Putman
Political Affairs Representative
IBEW Local 125

All parties without a "W" received a hard copy of IBEW Local 125's comments.

<u>ACTIONS</u>	<u>SERVICE LIST (Parties)</u>	<u>SCHEDULE</u>
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