



**Association of
Oregon Counties**

May 13, 2010

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

Dear Commissioners:

As an intervenor in LC 48, we strongly urge the Commission to acknowledge Portland General Electric's 2020 plan for the Boardman Plant as described in its 2009 Integrated Resource Plan addendum.

The Association of Oregon Counties (AOC) represents the interests of the counties of Oregon. We believe PGE's 2020 proposal is the right plan for Oregon and meets the OPUC's principle objectives for:

- **Least cost planning** – The 2020 Plan clearly represents the best path forward for Boardman, resulting in the greatest benefit for customers at the least cost. AOC is concerned that alternatives being suggested would have an adverse impact on jobs, business retention and recruitment, and have a detrimental impact on economic development efforts taking place in the state. Businesses in both rural and urban Oregon were affected by the recent recession, and we need every advantage to pull out of the current economic hole the state finds itself in. Conversely, we should actions that may dig the hole deeper.
- **Reliability** – System reliability is a key factor when attracting new businesses to Oregon. We have concerns regarding any plan that calls for the removal of an important base resource like Boardman before a similarly-reliable resource can be built to replace it. An early closure of the Boardman Plant could have statewide implications, affecting Oregon's energy infrastructure.
- **Environmental Quality** – While the environment is not the chief concern of the OPUC, maintaining Oregon's environmental quality is important to the livability of the state, with benefits to both residential and business customers and the state's business economy as a whole. Oregon's reputation as an environmental leader has already helped the state become a hub for renewable energy manufacturers. The amended plan provides environmental benefits to Oregon. It has the added benefit of ending coal carbon emissions 20 years earlier than planned. The amended plan also provides time for an orderly transition toward replacement resources, including the addition of new renewable resources to meet the state's Renewable Portfolio Standard of 25 percent renewables by 2025.

On behalf of Oregon counties, the AOC urges the Commission to acknowledge Portland General Electric's 2020 plan for the Boardman Plant as described in its 2009 Integrated Resource Plan addendum and allow the utility to move forward with its plan to replace this important energy resource.

Thank you for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "Mike McArthur". The signature is fluid and cursive, with the first name "Mike" and last name "McArthur" clearly distinguishable.

Mike McArthur
Executive Director