



**PORTLAND BUSINESS
ALLIANCE**

Leading the way

May 14, 2010

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

Re: LC 48 Comments on Portland General Electric's IRP 05-14-10

Dear Commissioners:

The Portland Business Alliance, representing more than 1,300 small, medium and large employers and electric consumers in the Portland metropolitan region, would like to offer the following comments on Portland General Electric's alternative plan for the Boardman Plant in its 2009 Integrated Resource Plan:

As Oregon businesses, business associations and customers, we are committed to the continued economic development of the region. We believe PGE's proposal to install some emissions controls in the near-term and close Boardman in 2020 is the right plan for Oregon. A 2020 shutdown would save PGE customers money, benefit the environment, and allow the company enough time to put into place a reliable replacement power source.

The financial burden of higher electricity prices for Oregon businesses associated with a 2014 shutdown of one of PGE's most reliable, low-cost resources is heavy. PGE's proposed 2020 closure of Boardman would save customers about \$600 million over the next decade, compared to a 2014 shutdown, helping PGE keep electricity costs reasonable.

PGE's proposal is a balanced plan that would close the plant early while meeting customers' needs for reliable power at reasonable costs. The company would reduce emissions during the plant's remaining years by installing new controls and making other operational changes, while ending all coal-related emissions from Boardman at least 20 years ahead of schedule.

We want to see strong environmental standards; but we also want to see those standards implemented in ways that will be cost effective for utility customers.

We respectfully request the Oregon Public Utility Commission support PGE's alternative plan for its Boardman Plant set forth in PGE's Integrated Resource Plan.

We also respectfully ask you to consider the views of the businesses associations who have signed the attached letters to the commission as you review PGE's IRP. The health of Oregon's economy and its need for electricity are closely linked, and the rate increases resulting from a premature closure of the Boardman Plant would have significant adverse impacts on economic development in the Portland region as well as the vitality of existing businesses.

Thank you for the opportunity to comment.

Sincerely,

/s/
Bernie Bottomly
Vice President
Portland Business Alliance



OREGON BUSINESS ASSOCIATION

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May 14, 2010

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OPUC Commissioner Susan Ackerman
OPUC Commissioner John Savage

Dear Commissioners:

As an Oregon business association representing small and large utility customers, OBA is committed to keeping our region economically competitive—and that definition includes retaining our national reputation as an environmental leader. Our members operate in a global economy in which managing costs is a critical component of competitiveness. PGE's Boardman 2020 Plan provides a predictable pathway toward a new energy future for Oregon that doesn't damage our economy along the way.

We believe PGE's proposal to install some emissions controls in the near-term and close Boardman in 2020 is a measured plan that respects the progressive Oregon tradition. A 2020 shutdown would save PGE customers money, benefit the environment, and allow the company enough time to put into place a reliable replacement power source.

PGE's 2020 proposal would dramatically reduce Mercury (90%) and NOx (50%) emissions during the plant's remaining years with new controls and the use of low-sulfur coal, reducing regional haze, and improving air quality. Meanwhile, all coal-related emissions from Boardman would cease at least 20 years ahead of schedule, a significant contribution to Oregon's greenhouse gas reduction goals.

There is no reason why Oregon's strong environmental standards cannot coexist with our economic goals, and the Boardman 2020 Plan provide a model for achieving that dual objective that will also be cost effective for utility customers.

The Oregon Business Association respectfully requests that the Oregon Public Utility Commission acknowledge PGE's alternative plan for its Boardman Plant set forth in PGE's Integrated Resource Plan. We urge you to support PGE's proposed actions for the Boardman Plant as described in the 2009 IRP Addendum.

Sincerely,

Ryan Deckert
President



East Metro
Economic
Alliance

May 14, 2010

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

Dear Commissioners:

East Metro Economic Alliance is committed to keeping our region economically competitive. We believe PGE's proposal to install some emissions controls in the near-term and close Boardman in 2020 is a measured plan that is sensitive to energy costs for Oregon industry, while making progress to improve the environmental footprint of our energy sources. A 2020 shutdown would save PGE customers money, benefit the environment, and allow the company enough time to put into place a reliable replacement power source.

Our members operate in a global economy in which managing costs is a critical component of competitiveness. We are concerned that a 2014 shutdown of the Boardman coal plant would cause a sustained spike in electricity prices for Oregon businesses that would be difficult to absorb. After the hydro system, the Boardman plant is one of PGE's most reliable and low-cost resources, and their 2020 Plan provides a predictable pathway toward a new energy future for Oregon that doesn't damage our economy along the way. The proposed 2020 closure of Boardman would save PGE customers about \$600 million over the next decade, compared to a 2014 shutdown, helping PGE keep electricity costs reasonable.

PGE's 2020 proposal would still dramatically reduce Mercury (90%) and NO_x (50%) emissions during the plant's remaining years with new controls and the use of low-sulfur coal, reducing regional haze, and improving air quality. Meanwhile, all coal-related emissions from Boardman would cease at least 20 years ahead of schedule, a significant contribution to Oregon's greenhouse gas reduction goals.

There is no reason why Oregon's strong environmental standards cannot coexist with our economic goals, and the Boardman 2020 Plan provides a model for achieving that dual objective that will also be cost effective for utility customers.

We respectfully request that the Oregon Public Utility Commission acknowledges PGE's alternative plan for its Boardman Plant set forth in PGE's Integrated Resource Plan. We urge you to support PGE's proposed actions for the Boardman Plant as described in the 2009 IRP Addendum.

Sincerely,

Travis Stovall
Executive Director

CERTIFICATE OF SERVICE

I hereby certify that I have this day caused the attached comments of Portland Business Alliance regarding OPUC Docket No. LC 48 – Portland General Electric's Integrated Resource Plan 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 Portland, Oregon, this 14th day of May, 2010.

A handwritten signature in black ink that reads "Bernie Bottomly". The signature is written in a cursive style with a large, stylized "B" at the beginning.

Bernie Bottomly
Portland Business Alliance
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