

September 1, 2010

The Oregon Forest Industries Council (“OFIC”) is an intervenor in LC 48, Portland General Electric’s (“PGE”) Integrated Resource Plan filing and submits these comments in support of PGE’s reply comments in that docket.

OFIC is a trade association representing more than 50 Oregon forestland owners and forest products manufacturing-related firms. Our members own more than 90% of Oregon’s private large-owner forestland base. As a representative of the forest industry in Oregon, OFIC attempts to maintain a positive, stable business operating environment for Oregon’s forest products community. We are an important part of this state’s economic engine and are concerned about how regulatory changes affect the business climate, especially when those changes affect the cost and reliability of electricity.

As we stated in our initial comments submitted in May, incorporated here by reference with regard to the potential for biomass as an alternative fuel for the Boardman facility, OFIC believes that if PGE is forced to close the Boardman facility prior to what is suggested in PGE’s proposed plan, the increased cost pressure on PGE’s rates for replacement power would be harmful to our members who are served by PGE. The reasonable path forward for the Boardman facility is one that provides a suitable timeframe for transition to other sources of power generation that ensures reasonably priced, reliable electricity. We understand that PGE’s amended IRP filing was updated on in their reply comments to include the additional pollution controls proposed by the Oregon Department of Environmental Quality. OFIC urges the Oregon Public Utility Commission to acknowledge PGE’s 2020/BART III proposal with a 2040 backstop as a reasonable path forward.

It is not news that the forest products industry has seen economic difficulties in recent years. Electricity costs are a major concern for our members. The 2020/BART III proposal sharply reduced emissions produced by the plant and ends the use of coal 20 years early but does so in a way that allows for time to buy or build cost-effective, reliable resources and explore other options for Boardman. The other control and closure options drafted by the Oregon Department of Environmental Quality for Boardman either do not provide adequate time to transition to replacement power, are unworkable from a technical perspective or are simply too costly for ratepayers and OFIC members. Unless DEQ accepts PGE’s 202/BART III proposal, the 2040 plan is the only practical option on the table.

With the proposed closure of the Boardman facility, there is an opportunity to do what is right for the state and the environment – and set a national precedent while doing so. But that window of opportunity is closing. PGE noted earlier this year that their 2020 plan would be difficult to achieve and that the support of the Oregon Public Utility Commission for the strategy would send a positive signal and be a key to obtaining the additional regulatory or legislative fixes necessary to make it happen. OFIC believes that this continues to be true and argues that PGE’s amended IRP 2020 plan with a 2040 backstop represents the best path forward.

/s/

Ray Wilkeson

CERTIFICATE OF SERVICE

I hereby certify that I have this day caused the attached comments from OFIC regarding LC 48 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 first day of September, 2010.

Ray Wilkeson

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