

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

LC48

In the Matter of)	INTERVENOR’S COMMENTS
)	
PORTLAND GENERAL ELECTRIC)	
)	
2009 Integrated Resource Plan)	

The following comments are submitted to the Oregon Public Utility Commission (“PUC”) on behalf of the Willard Rural Association in connection with IRP proceeding LC 48.

INTRODUCTION

The public wants the PUC to acknowledge only the plans of investor-owned utilities that are based on prudent and sensible least-cost planning. Portland General Electric’s (“PGE”) 2009 Integrated Resource Plan (“IRP”) falls short of demonstrating that the Cascade Crossing is the best choice for Oregon rate payers or that it is even needed.

I. DISCUSSION

a. There is a substantial likelihood that PGE’s ongoing use of BPA transmission line capacity is the best least-cost option for Oregon rate payers in lieu of building the Cascade Crossing

The IRP is asking the PUC to “acknowledge” the construction of a 200 mile privately-owned transmission line that is likely to be a one billion dollar project before it is finished.

Although the IRP presents both single and double-circuit lines as different cost options, it is clear PGE only wants to build the double-circuit line. PGE estimates the cost as follows:

Table 8-4: Cascade Crossing Capital Cost (Double-Circuit)

Capital Expenditures	Total
Substations	\$201,500,000
Transmission - Structures	\$377,000,000
Transmission - Conductors	\$125,300,000
Transmission - Capacitor Banks	\$19,200,000
Power Transformer at Bethel Sub	\$25,800,000
Land and Rights-of-Way	\$43,300,000
Environmental Assessment & Studies	\$4,600,000
Permitting, Licenses & Fees	\$2,600,000
Project Management	\$4,100,000
Outside Legal Services	\$1,000,000
Preliminary Engineering	\$500,000
Public Relations & Education	\$1,400,000
Habitat Mitigation Costs	\$10,200,000
Contingency & Other Costs	\$6,200,000
Total Project Cost	\$822,700,000

LC 48 – PGE’s 2009 IRP, p. 197

In recent “open houses,” PGE indicated that it will be acquiring a new right-of-way for the line. In a November presentation before the Marion County Commissioners, PGE indicated that the right-of-way could be 100 yards wide. If true, the line will cover close to 7300 acres of private and public land. In the eastern part of Marion County alone, the line will impact over \$50 million dollars in tax-assessed property values (as per the records of the Marion Co. tax assessor), consisting mostly of farm land.

PGE is telling private landowners that it wants easements that will last forever and refuses to discuss long-term leases. PGE is also telling landowners that land use under the wires will be subject to PGE’s control and authority.

Under circumstances like these, no one should be surprised if landowners in the year 2010 look at the financial impact on property values in ways that depart from the past. There is evidence that suggests PGE will pay substantially more for right-of-way acquisition across rural and agricultural lands than what it is estimating above.

For example, in a recent condemnation proceeding in California, the transmission provider’s appraiser provided the following estimate of the value “taken” on a parcel of grazing land due to the overhead wires from a new power line:

<u>Market Value of the Acquired Easements</u>	
<i>Wood Property</i>	
<i>Before the Taking:</i>	\$467,707.50
<i>After the Taking:</i>	<u>\$458,162.70</u>
Market Value of the Acquired Easements:	\$9,544.80

The jury awarded the land owner an amount more than equal to the appraised value of the entire property before the taking:

WOOD PROPERTY:	
4. What was the fair market value in cash of Wood Ranch property on August 2003, immediately before the taking by the government of the perpetual easement for high voltage power line?	<u>\$ 1,112,520</u>
5. What was the fair market value in cash of Wood Ranch property on August 2003, immediately after the taking by the government of the perpetual easement for high voltage power line?	<u>\$ 643,248</u>
6. What is the total Just Compensation for Wood? (Subtract Line 5 from Line 4.)	<u>\$ 469,272</u> Wood

U.S. v. 43.77 Acres of Land, *et al.*, Case No. CV-03-6065-AWI (E.D Cal.) (Jury Verdict, Feb. 14, 2007)

The point is this: No one can predict right-of-way costs for a 200 mile project with precision. PGE’s IRP sets forth five different case studies that are intended to demonstrate whether the most sensible plan for Oregon rate payers involves PGE using BPA lines or building its own. These studies are built on different assumptions about BPA price increases in the future, but none take into account how variations in land acquisition costs will impact overall construction costs.

As they currently stand, the majority (60%) of PGE’s case studies (for the double-circuit line) indicate that not building the Cascade Crossing makes the most financial sense for Oregon rate payers:

Table 8-6: NPV Differential between Cascade Crossing & BPA-provided Transmission Service (Double-Circuit)

	Net NPV (2009\$)		
	Portfolio Diversified Thermal w/ Green	Diversified Green	Diversified Green w/ on- peak Energy Target
1	(\$189,513)	(\$196,883)	(\$156,929)
2	(\$126,388)	(\$133,758)	(\$93,804)
3	(\$78,722)	(\$85,656)	(\$45,461)
4	\$52,635	\$47,084	\$88,044
5	\$83,677	\$78,126	\$119,085

LC 48 – PGE’s 2009 IRP, p. 198

Before the PUC acknowledges the Cascade Crossing, the question PGE needs to answer is: how sensitive are the above numbers to what PGE has identified as the *key* financial assumption – that is, construction cost? And how do the numbers in red (which indicate the project should not be built) creep down the chart if PGE has substantially underestimated right-of-way acquisition costs?

PGE's case studies for the single-circuit project (estimated at \$613.1 million in cost) indicate that the magnitude of the Net NPV numbers swing dramatically when cost is reduced by approximately \$200 million. What happens in both cases (double-circuit and single-circuit) if the cost estimate is increased by \$200 million?

PGE's IRP also neglects to address, head-on, the likely prospect of rate increases caused by the Cascade Crossing. The IRP is built on various kinds of sophisticated modeling processes and techniques. PGE's case studies indirectly embed answers about rate increases because the majority of the case studies show that it will be cheaper for rate payers if the project is not built. Even so, the public is entitled to clear data that estimates just how much a typical electric bill will go up if the Cascade Crossing is built. PGE has refused to provide this information despite multiple requests over many months.

Related to the above, the PUC should bear in mind that PGE's stated equity value in its recently released annual report (for 2009) is approximately 1.54 billion dollars with an unfavorable ratio between equity and debt that is not trending well. PGE is now asking the PUC to acknowledge a plan that will enable PGE to incur capital costs, and new debt, that will further skew PGE's debt in a way that seems likely to lead to significant rate increases.

The PUC will also recall that PacifiCorp, a PGE competitor, recently filed for rate increases asking for a total increase of about 20% in the amounts paid by its Oregon customers. It is astonishing to read the request, because it appears to be based almost entirely on PacifiCorp's construction cost for a transmission line between Idaho and Utah. In other words, PacifiCorp is now asking its Oregon customers to pay 20% more to cover the cost of an out of state transmission line (approximately \$700 million).

According to PacifiCorp, its justification for the rate increase is that the Oregon PUC "acknowledged" PacifiCorp's earlier IRP that identified the line as a planned project – so PacifiCorp just went ahead and built it. *See* UE 217. While the Boardman plant is creating much controversy and comment as part of the current IRP proceeding, the PUC must not ignore the fact that a \$1 billion dollar capital construction project for a transmission line is buried underneath it all. The public expects the PUC to guard against a repeat of the PacifiCorp situation.

Finally, BPA is already building a new power line in eastern Oregon between McNary and John Day that is designed to address wind power connections and real or perceived congestion problems from east to west (this is discussed later). Given that BPA is in the process of building a new line, the most prudent course of action is for the

PUC to tell PGE to wait and revisit the Cascade Crossing in a few years, after the impact of the new BPA line is known. At that point in time, PGE can more accurately model BPA transmission tariffs with fewer assumptions.

b. PGE's IRP omits the Salem to Oregon City leg of the Cascade Crossing

It is hard to understand why PGE is seeking to build a major transmission line that delivers power across the Cascade Range to Salem when most of PGE's customers are north of Wilsonville.

PGE does not address that issue in the IRP. However, after the IRP was filed, PGE commenced a series of "open houses" in Marion County for the purpose of informing locals that the Cascade Crossing will require PGE to build another line from Salem to Oregon City. In a March 19 letter to landowners, PGE stated:

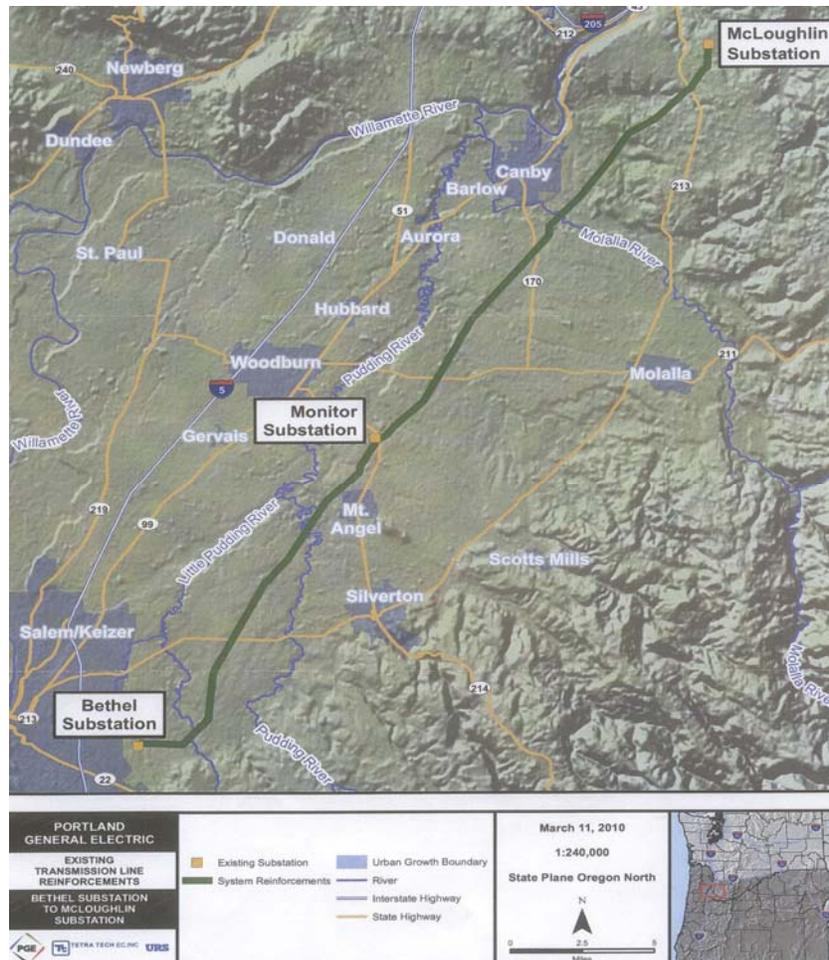
The primary element of this proposed project is a 200-mile, double-circuit 500-kilovolt transmission line running southwest from PGE's Coyote Springs plant in Boardman, Oregon to our Bethel substation east of Salem.

In addition, PGE would need to upgrade its existing 230-kilovolt (230kV) transmission line from Salem to Oregon City in order to reliably distribute the electricity this new line would bring to the Willamette Valley. You own property relatively close to our existing transmission line, which is why you are getting this letter.

If the project is approved, PGE would remove existing wooden H-frame structures which hold a single-circuit 230kV line, and replace them with two parallel, steel monopole structures which each carry a 230 kV line. We also would make upgrades to the Bethel and McLoughlin substations. This work would take place sometime between 2013 and 2015.

PGE March 2010 letter to Marion County landowners

The Salem to Oregon City extension appears to be the same as building an entirely new line. While the exact mileage is not available, the extra leg must be closer to 40 than 30 miles, as reflected on the PGE map distributed to local landowners:



In an IRP that already contains many assumptions, it is not unreasonable to estimate PGE’s construction cost for the Cascade Crossing (double-circuit), on a per mile basis, as follows: $(\$822.7 - \$40.3 \text{ million})/200 \text{ miles}$ or about \$3.9 million dollars per mile (which excludes all right-of-way acquisition costs). Likewise, it is not unreasonable to estimate that adding another 40 miles to the project could create in the neighborhood of \$150 million in extra cost. Or even if the construction cost of the extra leg is \$2 million per mile, it creates another \$80 million in cost.

It is obvious that PGE’s case studies did not take into account what has to be a significant cost component (Salem to Oregon City) linked to the project that will push case study results toward a showing that the Cascade Crossing is a bad idea for Oregon rate payers.

PGE’s case study nos. 4 and 5 are the only ones that arguably indicate rate payers will benefit from the Cascade Crossing project – and only then if PGE is able to acquire an unknown third-party equity investment. While it is hard to tell, the IRP does seem to indicate that the “third party” may take over something like 10% of the line’s transmission capacity. If the equity investment is proportionate, which is not an

unreasonable assumption at this point, then the added cost of the Salem to Oregon City leg may take away any benefit resulting from a third party investment.

In sum, it appears PGE has omitted about 20% of the length of the entire project in its case studies. Before the PUC acknowledges the Cascade Crossing, PGE should be required to demonstrate the sensitivity of PGE's case studies to the increased cost caused by the Salem to Oregon City leg of the project. It is difficult to see how it makes sense to build a major line that extends miles into the middle of the Willamette Valley, near Salem, only to backtrack up to Oregon City where it is wanted.

c. PGE's IRP appears to be overstating and distorting "need"

PGE's IRP is projecting load growth over the next 20 years at a rate that has not been seen at any time since the early '80's, and possibly, any time since load growth statistics have been kept. The IRP projects load growth going forward only – with no historical data to reflect an ongoing trend, whether something new has occurred, or whether PGE is just making things up.

PGE is not responding to data requests for its average and peak load statistics for the last ten years, although its SEC filings indicate that PGE's net system peak load occurred in *December 1998* and has not been exceeded since then:

PGE's all-time high net system load peak was 4,073 MW and occurred in *December 1998*.

PGE SEC 10-K filing (FY 2008), p. 12 (emphasis added).

The above statement makes many of the IRP graphs look bad. In contrast to statements filed with the SEC, PGE evidently believes it has immunity to FTC advertising regulations, because it is creating Oregon publications that suggest to the general public that energy demand is growing at rates not seen before:

The Pacific Northwest continues to be one of the fastest growing regions in the country. Over the next 20 years, the demand for more electricity to serve Oregon customers will increase more than 45 percent, compared to 30 percent nationally.

Portland General Electric, *Issues in Perspective*, November 2009.

At the same time, the Oregon Dept. of Energy is telling the public something different:

At the end of 2002, both of Oregon's aluminum smelters were closed, one permanently. This appears to be part of the long-term trend toward a less energy-intensive Oregon economy.

<http://www.oregon.gov/ENERGY/supply.shtml>[4/26/2010 2:22:41 PM]

Oregon PUC statistics reflect the same thing as what the Oregon DOE is telling the public. Even if the mix is changing between residential, commercial and industrial customers over time, the PUC's statistics indicate that PGE has experienced flat-line growth for the last ten years in total energy sold to all of its retail customers:

Portland General Electric Company
TEN-YEAR SUMMARY
SELECTED STATISTICS

	Oregon Total ^[A]					Residential Averages in Oregon			
	Revenue From Retail Energy Customers	Energy Sold to Retail Customers (MWh) ^[B]	Delivery to ESS Customers (MWh) ^[B]	Average ^[D]		Number of Customers	Revenue Per kWh (Cents)	Per Customer	
				Number of Customers	Revenue Per kWh (Cents)			Revenue	kWh
1999	\$973,326,617	19,258,992	NA	714,130	5.05	627,396	5.90	\$697	11,802
2000	\$1,038,204,376	19,872,544	NA	726,039	5.22	637,331	6.02	\$702	11,063
2001	\$1,096,155,658	19,040,188	NA	733,058	5.76	643,596	6.59	\$725	11,001
2002	\$1,384,322,786	18,771,884	0	741,949	7.37	649,674	8.05	\$874	10,864
2003	\$1,283,136,445	18,425,854	0	750,496	6.96	658,232	7.82	\$844	10,785
2004	\$1,262,880,182 [C]	17,764,138	775,878	762,336	7.11 [E]	668,830	8.05	\$875	10,870
2005	\$1,264,877,648 [C]	17,540,047	1,213,906	775,533	7.21 [E]	680,093	8.10	\$872	10,768
2006	\$1,361,008,240 [C]	18,432,527	998,574	788,831	7.38 [E]	691,931	8.29	\$907	10,944
2007	\$1,439,248,223 [C]	17,461,742	2,164,687	800,587	8.24 [E]	701,952	9.31	\$1,020	10,953
2008	\$1,483,317,814	17,575,806	2,417,316	811,315	8.44	710,991	9.62	\$1,066	11,080

[A] Oregon Total excludes Sales for Resale and Other Electric Revenue.

[B] 1 Megawatt hour (MWh) = 1,000 Kilowatt hours (kWh).

[C] Beginning January 1, 2004, certain commercial and industrial customers have chosen to be served by Electricity Service Suppliers (ESSs) for their energy needs.

These figures have been revised from prior reports to exclude revenues received by Portland General Electric from providing distribution services to ESS customers.

[D] These figures exclude ESS customers.

[E] These figures have been revised from prior reports to exclude Oregon revenue from ESS customers and MWh of ESS deliveries.

2008 Oregon Utility Statistics (Oregon PUC), p. 8.

It is also noteworthy that PGE's top executives are telling stock analysts things that are consistent with the Oregon DOE and the PUC. They are not telling stock analysts that PGE's customer demand is increasing at all, let alone faster than the rest of the country. The following is a public transcript of PGE's most recent 1st quarter earnings call to stock analysts for FY 2010:

Unidentified Analyst: Just some other calls going on this morning, so I apologize if you've already gone over this. Just wanted to go over load growth from 2009 to 2010. I think you said it was flat overall, but I was kind of looking for a customer split, residential versus commercial and industrial.

Maria Pope: Sure. We're expecting load to be roughly flat in total; down for residential; pretty much flat for commercial, but down a little bit; and then for industrial, up for what was a very low base in 2009. In the first quarter, we were

down in all segments by 2.2% for residential; commercial, 3.3%; and industrial, 6%; for a total of 3.3%.

Jim Piro: The forward backload cash is based on weather-adjusted information.

Maria Pope: Yes, all of that is weather-adjusted.

Unidentified Analyst: So does the decoupling protect you on the residential side of the down?

Maria Pope: Yes, it did, and we did have a decoupling adjustment in the first quarter of about \$5 million. We also had a decoupling adjustment in the first quarter of last year, but not quite as significant.

Jim Piro: Just recall decoupling only deals with use per customer, does not adjust for weather. So we weather-adjust the data. So what we actually saw in the first quarter was a decline in use per customer at the residential level, and that's what we adjusted for, for the use per customer.

Unidentified Analyst: And for 2011, you said flat overall again. But what would you expect, I guess, the split to be?

Maria Pope: Flat overall, continued slight decrease in residential as people are conserving more, and then with a slight return in the economy, up slightly for commercial and a little bit more for industrial.

Unidentified Analyst: Okay. And are you seeing any residential customer growth at all?

Maria Pope: We are. We saw 0.5% of new customers in our service territory in the first quarter over the last year.

Jim Piro: What you see in Oregon is actually we do see customer growth, but that's offset by efficiency. And we are promoting efficiency in Oregon through the Energy Trust of Oregon in our programs to reduce consumption. And so we're seeing reductions in use per customer, which offsets the growth in number of customers.

PGE Q1 Earnings Call Transcript, <http://seekingalpha.com/article/202872-portland-general-electric-company-q1-2010-earnings-call-transcript?page=9>[5/5/2010 4:49:07 PM].

Outside the calls with analysts and outside proceedings before the PUC, PGE is avoiding questions about Oregon's lack of growth in electrical energy consumption by telling farmers and the Marion County Commissioners that Oregon's unemployment problem will be solved if we build new power lines:

Cascade Crossing Transmission Project

The Cost of Not Building Transmission

“If the top five planned transmission projects in the Pacific Northwest are not built, the region will lose out on \$55 billion to \$85 billion in economic activity and up to 60,000 jobs annually over the next 25 years.”

Idaho National Laboratory Report, July 2008
Report funded by U.S. Department of Energy

Cascade Crossing is identified in the report as one of the top five projects.

8



PGE Presentation to Marion County Farm Bureau, April 21, 2010.¹

The Oregon DOE reports that Oregon’s aluminum industry has been declining since the early ‘90’s – a time when everyone agrees power line transmission capacity was adequate. If anyone reads it, the Idaho National Laboratory Report actually suggests that Oregon’s aluminum industry might be saved if more power lines are built.

And the 60,000 new jobs created as a result of building new power lines (that’s every year for the next 25 years) represents an astounding total of 1.5 million new jobs. These are permanent jobs, according to the report. It is interesting that the U.S. Dept. of Labor publishes statistics that indicate Oregon’s total available work force is only about 1.9 million people. Therefore, if anyone believes what PGE is telling the public about it, things will be very good if the Idaho report is followed, and the Cascade Crossing should guarantee full employment in the state of Oregon for decades.

PGE’s IRP cites the Idaho report as grounds for building the Cascade Crossing (p. 89, fn. 80), but it is not surprising that PGE refuses to respond to requests that it confirm or deny its belief in the truth and accuracy of the report.

¹ The same presentation was given by PGE to the Marion County Commissioners in November 2009.

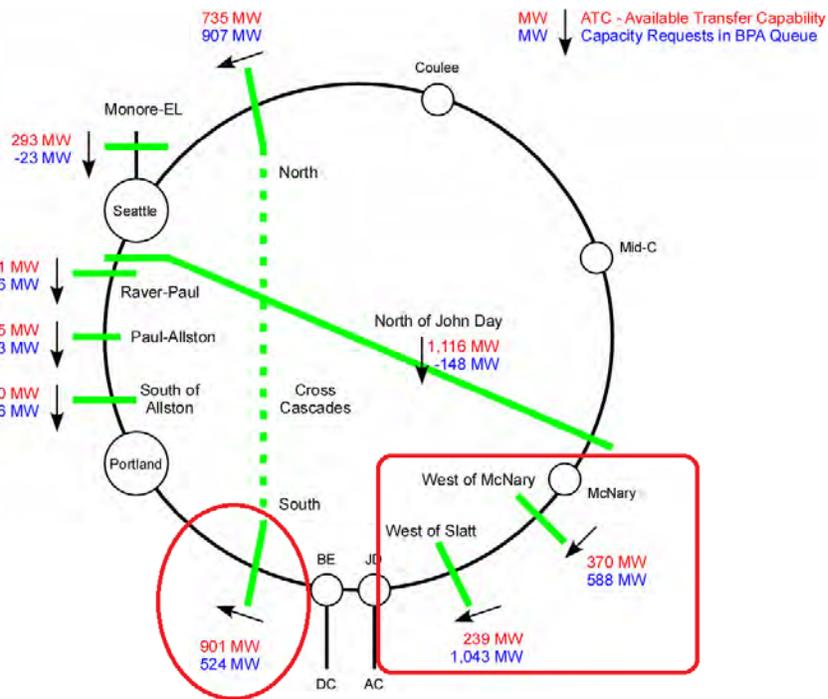
All things considered, one could argue that the Cascade Crossing appears to be PGE’s partial solution to generate growth in the size of its business when its energy sales have been flat - because the project will create a significant equity asset on PGE’s books.

The PUC should not acknowledge the Cascade Crossing portion of the PGE’s IRP until PGE presents better and reliable evidence about future energy growth.

d. BPA’s projected requests for transmission across the Cascades do not exceed capacity; BPA is addressing capacity problems to the east by building a new east-west line between McNary and John Day

Page 171 of PGE’s IRP depicts a schematic that portrays available transmission capacity against future requests across various cut-planes. The Cascade mountain cut-plane (circled below on the left) indicates that there is presently sufficient BPA transmission capacity to cross the mountains. Only the cut plane between McNary and John Day (circled below on the right) indicates insufficient capacity in that leg of the transmission system:

Figure 8-3: Cutplane Capacity Availability, October 2009



LC 48 – PGE’s 2009 IRP, p. 171

The data that PGE uses to project future requests comes from BPA’s website. If anyone reviews this information, on the surface, it appears that companies are filing duplicative requests that result in an overstatement of future load growth or potential congestion on different segments of the BPA transmission system. In fact, a BPA official recently reported:

Mr. Oster started the presentation by outlining the situation BPA was in prior to the 2008 network open season.... He said it was also clear that many of the transmission service requests in the BPA queue were speculative and duplicative.

As an example, a single 100 MW project would account for 500 MW in the transmission service queue, as a developer would file multiple requests to determine the best place to connect to the BPA grid. At the same time, some customers with an immediate need for transmission service were blocked by speculative transmission service requests higher up in the queue.

NWCC, *Transmission Update*, May 2009

Given that BPA is building a new line along the McNary to John Day leg of the system, it appears that BPA is addressing any perceived congestion problems from eastern Oregon into the Portland metropolitan area, where most of PGE's customers are located.

PGE's IRP does not address how or whether the new BPA line will alter the need for construction of the Cascade Crossing Project. The PUC should not acknowledge the IRP until PGE addresses this issue. And it might be the most prudent course, and in the public's best interest, to wait and see how the BPA line impacts the system overall before Oregon rate payers are asked for more.

CONCLUSION

For all the foregoing reasons, it is respectfully submitted that the PUC should not "acknowledge" the Cascade Crossing Project at the present time. The PUC should order PGE to address the above issues in PGE's next IRP filing.

DATED this 13 day of May 2010.



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Certificate of Service

I certify that I have this day served the foregoing Motion to Intervene Out of Time and Petition to Intervene upon all parties of record in LC 48 by delivering a copy by electronic mail or by U.S. mail to all parties as indicated on the service list compiled by the OPUC.

Dated this 13th day of May 2010.

A handwritten signature in blue ink that reads "Bruce A. Kaser" followed by a small "ds" mark.

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