

**BEFORE THE PUBLIC UTILITY COMMISSION OF OREGON**

**LC 48**

In the Matter of  
PORTLAND GENERAL ELECTRIC CO..  
2009 Integrated Resource Plan

) Reply Comments  
) of the  
) **Ecumenical Ministries**  
) **of Oregon and Oregon**  
) **Interfaith Power and Light**  
)

**I. Introduction**

Ecumenical Ministries of Oregon (EMO) and its Oregon Interfaith Power and Light project appreciate this opportunity to reply to earlier comments in this proceeding. EMO continues to view the decisions in this docket as having significant environmental, social, and economic impacts on Oregon. Our effort to involve many parties across the state reflects this importance.. We support a transition from coal, or a shutdown, no later than 2020 because it addresses our concerns for many aspects of the common good, including the well-being of workers and the local community, utility rates and stewardship of God’s creation.

**II. PGE Basis for Quantifying Future Resource Needs Lacks Substantiation**

As the basis for costing the future scenarios, PGE relies on an assumed load growth of 2.22 percent annually offset by energy efficiency of 0.31 percent. We, along with numerous other parties, disputed these assumptions based on numerous factors that all indicate a wide disparity of PGE’s forecast from other mainstream forecasts.

PGE replied on pages 24-29 with several citations that seriously skew the available data. By relying on historic data, going back 28 years, and discounting the most recent past. PGE’s forecast continues to greatly overestimate the resource needs to meet power demands, whether and when Boardman is retired. For instance PGE states “...extrapolating the most recent decade to the next is often erroneous.”(PGE Reply comments, page 24). This reasoning indicates that PGE is substituting reliance on the period 1980-1990 or 1990-2000 to form the basis for its forecast load growth. Is it wise to replace 0 - 10 year old data with 10 to 30 year old data?

In fact, the most comprehensive data gathering and forecasting authority in the nation directly contradicts PGE’s noticeable shift to older data rather than the most recent decade’s slowdown in load growth. As the EIA has done in following its significant data bank (see graph below), we believe it would be much more reasonable to rely on the “recent past” rather than the “distant past”.

## Residential and commercial sectors dominate electricity demand growth

Figure 59. U.S. electricity demand growth, 1950-2035 (percent, 3-year moving average)



(U.S. Energy Information Administration, 2010 Annual Energy Outlook)

As can be seen, the most comprehensive data gathering and forecasting authority in the nation, the Energy Information Administration, directly contradicts PGE's noticeable shift away from the most recent decade's slowdown in load growth. Notwithstanding PGE's assertions, it would in fact be much more reasonable to rely on the "recent past" rather than the "distant past."

Depending on how efficiency is treated, anywhere from 50% to 100% of power needs projected from Boardman in the 2015-2020 period will "disappear" once PGE's forecast is corrected.

**IV. Conclusion** The moral consequences of this decision are critical. Knowing what we know about the social justice and environmental impacts of global warming, it is no time for PGE to push for a 2040 closure. On a technical level, there are very narrow cost differences between some of the compliance options involved in the Boardman decision. We are very concerned that because the load growth forecast underlying PGE's forecast resource needs is so seriously flawed, the comparison of impacts to ratepayers cannot reliably be derived from this IRP. Our concerns with the most vulnerable populations in PGE's service territory dictate that we ask the Commission to seriously examine how such a wide divergence in load growth forecasts impacts your decision on acknowledging cost recovery for the enormous expenditures PGE is proposing in the 2040 option. It would be a terrible mistake for a flawed forecast to dictate huge economic and environmental costs on Oregon and its ratepayers for an entire generation. We ask you not to acknowledge any plan that operates Boardman to 2040.

Dated this first day of September, 2010

Respectfully Submitted,

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## LC 48 CERTIFICATE OF SERVICE

Re: Ecumenical Ministries of Oregon's Comments on the matter of Portland General Electric Companies Integrated Plan Docket No. LC 48.

I hereby certify that I served the foregoing **Reply Comments of EMO in Portland General Electric's 2009 Integrated Resource Plan (LC48)**, on the following persons on September 1, 2010 by hand-delivering, e-mailing, or mailing (as indicated below) to each a copy thereof, and if mailed, contained in a sealed envelope, with postage paid, addressed to said attorneys at the last known address of each shown below and deposited in the post office on said day at Salem, Oregon.

DATED this 1st day of September, 2010.

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