



Public Utility Commission of Oregon
550 Capitol St NE #215
PO Box 2148
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May 15, 2010

Dear Public Utility Commissioners:

As an intervener in LC 48, Portland General Electric's (PGE) Integrated Resource Plan filing, Oregon Physicians for Social Responsibility strongly urges the commission to consider the serious health concerns and costs of continuing to operate the Boardman Coal Plant beyond 2014. In this circumstance both health and cost-effectiveness make the decision relatively easy. As an organization concerned with the health of Oregonians and others the ongoing health impacts are very serious not only from climate change and emission of greenhouse gases but from direct pollution emitting from this plant.

Oregon PSR and its 1500 members wish to point out that all coal plants are responsible to the law by complying with existing and expected rulings by the Environmental Protection Agency and the Department of Environmental Quality. After years of deliberation and hearings a schedule has been determined to apply to Boardman to control its pollution. This process was lengthy and extremely complete to require mercury, nitrous oxides (NO_x) and sulfur dioxides (SO_x) controls for both the scenic airshed and smog and for the health of those in both Washington and Oregon. The initial mercury controls and limited NO_x controls will be installed by 2012. However the new proposal by PGE is to delay putting on the additional control required by 2014 and a second set by 2017 which cost over \$500 million. The potential win for the health of Oregonians is a non-binding promise to close the plant by 2020. This is not acceptable to those downwind who are exposed neither to the particulates nor to comply with the law protecting our wilderness and scenic gorge areas from smog and acid rain.

Sulfur oxides are one of 6 criteria air pollutants that are airway irritants causing bronchitis and exacerbating chronic lung diseases. In addition, it can result in lower birth weight babies among other medical problems. These compounds also combine in the atmosphere to create small particle pollution. This pollutant is a significant part of the loss of visibility in 11 wilderness areas but more importantly creates small particle pollution that is very harmful to inhale. It allows other pollutants

such as heavy metals, dioxins and allergens to be inhaled deep into the lung to do damage and even cross over into the bloodstream exacerbating lung and heart disease. Many of these small particles are wafted high into the atmosphere and pollute areas far from the plant.

Current scientific evidence links NO₂ exposures, another criteria air pollutant, ranging from 30 minutes to 24 hours, with adverse respiratory effects including airway inflammation in healthy people and increased respiratory symptoms in people with asthma and other respiratory diseases. NO_x reacts with ammonia, moisture, and other compounds to form small particles. Likewise, these small particles penetrate deeply into sensitive parts of the lungs and can cause or worsen respiratory disease, such as emphysema and bronchitis, and can aggravate existing heart disease, leading to increased hospital admissions and premature death.

Lastly and perhaps more importantly is the impact of this plant on climate change. While controls based on this issue have not yet been promulgated it is worth noting that carbon pricing in some form will be utilized to control greenhouse gas emissions. Nitrogen oxides can reduce upper level ozone which protects us from harmful ultraviolet A and B radiation and reduces its role as an atmospheric coolant. One type of NO_x is nitrous oxide (N₂O) a potent greenhouse gas which along with the 5 million tons of carbon dioxide yearly from Boardman provides our state with the highest point source for greenhouse gas emissions. The health impact of global warming is huge with increasing sea level, increasing heat related deaths, increase ozone pollution and grave loss of our major source of summer clean water stored as snow pack. The economic impact from global warming will far surpass our current economic crisis not only from its impact on our health but on the need to build new infrastructure to manage extreme weather events and new sources of clean safe drinking water and water for irrigation-the major use of water in Oregon.

You may say that the overriding issue of cost is more important however than our health if the plant will close in 2020 but the Integrated Resource Plan shows that closing the plant in 2014 is cost effective from a rate-payers point of view. Carbon cost will be a factor in the near future and this will enhance the cost of continuing to run Boardman rather than investing in new clean energy and more importantly by creating far more jobs to retrofit our homes and businesses to use less energy. Only under the scenario of no carbon cost did ratepayers pay less for electricity from Boardman.

Oregon PSR urges the commission to accurately evaluate the cost assessments regarding Boardman and in conjunction with grave health concerns to reject a plan based on supposition that it can circumvent the law in complying with air pollution rulings. The cost alternatives of closure in 2014, 2020 or 2040 are nearly equal and hence weight must be given to the health of Oregonians and its effect on costs as well.

Sincerely,

/s/

Catherine Thomasson, MD

LC 48 CERTIFICATE OF SERVICE

I hereby certify that I served the foregoing **Initial Comments of Oregon Physicians for Social Responsibility in Portland General Electric's 2009 Integrated Resource Plan (LC48)** on the following persons on May 19, 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 Portland, Oregon.

DATED this 19th day of May, 2010

By: /s/ Maye Thompson

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