



June 12, 2017

Scott Gibbens
Public Utility Commission of Oregon
201 High St SE, Suite 100
Salem, Oregon 97301-3398

Sent via email to: scott.gibbens@state.or.us

Re: Comments on Oregon PUC Docket No. UP 349 – PGE Port Westward tank sale to Global Partners’ oil-by-rail and ethanol terminal.

Dear Mr. Gibbens,

The Oregon Chapter of the Sierra Club (Sierra Club) submits these comments regarding the Public Utility Commission of Oregon’s (“PUC”) Docket No. UP 349. This docket contains a request by Portland General Electric (“PGE”) to sell large tanks and other facilities at Port Westward, Oregon, to Cascade Kelly Holdings LLC, doing business as Columbia Pacific Bio-Refinery, a company owned by Global Partners LP (hereinafter, collectively, “Global”).

Sierra Club is in agreement with the position that the Columbia Riverkeeper (Riverkeeper) laid out in their May 17th letter to you on this issue.¹ In their letter Riverkeeper makes it clear that the sale of these tanks will result in “increasing Global’s capacity to receive crude-by-rail at Port Westward, and export crude oil through the Columbia River estuary, ...” The letter goes on to detail numerous environmental impacts. Riverkeeper’s letter makes a compelling case that the sale of these tanks is not in the public interest.

Further, the Sierra Club asserts that this sale will likely result in the expanded use of fossil fuels which will increase the severity of the impacts of climate change. This outcome is clearly not in the public interest as it will cause harm to the public. We believe that this fact alone is enough for the PUC to deny this sale.

This request for a sale comes at a time when PGE is proclaiming itself a climate champion and supporting the adoption of the recent 100% Renewable Energy resolutions by both The Portland City Council and the Board of Commissioners of

¹ Comments on Oregon PUC Docket No. UP 349 – PGE Port Westward tank sale to Global Partners’ oil-by-rail and ethanol terminal.(online at: <http://columbiariverkeeper.org/wp-content/uploads/2017/05/2017.5.17-Comment-to-PUC-on-PGE-Global-Tank-Sale.pdf>)

Multnomah County.² Additionally, PGE is proudly announcing that it has signed on to the Paris Accord.³

We are encouraged to see that the Public Utility Commission of Oregon has, through its Chair, Lisa Hardie, reaffirmed their participation in the Western Public Utility Commission's Joint Action Framework on Climate Change. In this document, the PUC "... recognizes that climate change is a serious threat to the health, safety, and welfare of all people." The sale of these tanks will enable the expanded and continued use of fossil fuels which will worsen the impacts of climate change.

The Sierra Club asks that the PUC honor and hold PGE accountable to their word: that they understand the impacts of continued use of fossil use and are committed to leading Oregon towards a fossil fuel free future. Please deny the request by PGE to sell these oil tanks and instead direct them to demolish these dilapidated tanks and other aging infrastructure and clean up the contamination beneath them.⁴

Future generations will applaud your leadership and vision.

A handwritten signature in black ink that reads "Gregory P. Monahan, PhD". The signature is written in a cursive, flowing style.

Gregory Monahan, PhD
Chair, Beyond Gas & Oil Team
Oregon Sierra Club
Cell: 503-314-9647

² See, e.g., Portland Business Journal: [Multnomah County adopts goal of all renewables by 2050](#); [Portland council says yes to 100% renewable energy by 2050](#); [Readers see 2050 as doomsday for fossil fuels](#)

³ See, e.g., PGE's website, PGE joins more than 1,200 U.S. state, city and business leaders to say #WeAreStillIn, <https://www.portlandgeneral.com/our-company/news-room/news-releases/2017/06-06-2017-pge-joins-more-than-1200-wearestillin?linkId=38425648>

⁴ See Oregon Department of Environmental Quality, *Notice of Proposal to Add Contaminated Property to Confirmed Release List and Inventory* (Feb. 1, 2017) (describing cleanup efforts but noting that "[s]ome contamination remains due to location under footings, etc.") (online at: <http://www.deq.state.or.us/Webdocs/Controls/Output/PdfHandler.ashx?p=0c773332-ff01-4a76-a048-edd8a6bba0ccpdf&s=CRL-Inventory%20Listing.pdf>)