

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**LC 48**

In the Matter of	)	<b>SIERRA CLUB, COLUMBIA</b>
	)	<b>RIVERKEEPER, FRIENDS OF</b>
PORTLAND GENERAL ELECTRIC	)	<b>COLUMBIA GORGE AND THE</b>
	)	<b>NORTHWEST ENVIRONMENTAL</b>
2009 Integrated Resource Plan	)	<b>DEFENSE CENTER'S</b>
	)	<b>MOTION TO FILE SUPPLEMENTAL</b>
		<b>COMMENTS</b>

1. Sierra Club, NEDC, Friends of Columbia Gorge and Columbia Riverkeeper (Intervenors) hereby respectfully move the Administrative Law Judge to allow Intervenors to file supplemental comments in the above captioned docket on or before May 19, 2010. Intervenors intend to file comments on May 14, 2010, but request time to file supplemental comments in light of PGE's inability to respond to all of Intervenors' Data Requests in time for Intervenors to file their comments by the deadline established in the revised schedule in this matter.

Intervenors are requesting a short amount of time to review and respond to the additional information PGE will produce in response to Intervenors' Data Requests. The undersigned counsel has conferred with PGE's counsel, who has indicated that PGE will not oppose this motion to file supplemental comments.

2. Intervenors propounded their final set of Data Requests on April 5, 2010, four days before PGE filed an Addendum to PGE's 2009 Integrated Resource Plan on April 9, 2010. PGE began providing responses to this last set of Data Requests on May 10, 2010. Responses have been provided on various dates since that time. On May 11, 2010, PGE informed undersigned counsel that responses to three of Intervenors' Data Requests would be delayed until

May 16, 2010. PGE counsel also informed undersigned counsel by phone that supplemental responses to one earlier Data Request would be provided on May 17, 2010.

3. An extension of time for Intervenors to file comments in this matter will not prejudice any party and will not require any further modification of the schedule.

4. Accordingly, Sierra Club, NEDC, Friends of Columbia Gorge and Columbia Riverkeeper respectfully request that the time for filing intervenor comments be extended until May 19, 2010.

DATED this 13<sup>th</sup> Day of May 2010.

Attorney for Intervenors:

*s/ Aubrey Baldwin*

Aubrey Baldwin, OSB No. 060414  
Pacific Environmental Advocacy Center  
10015 SW Terwilliger Blvd.  
Portland, Oregon 97219  
503.768.6929 phone  
503.768.6642 fax  
[abaldwin@lclark.edu](mailto:abaldwin@lclark.edu)

**Certificate of Service**

I certify that I have this day served the foregoing Motion to File Supplemental Comments 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 13h day of May 2010.

Attorney for Intervenors:

*s/ Aubrey Baldwin*

Aubrey Baldwin, OSB No. 060414  
Aubrey Baldwin  
Pacific Environmental Advocacy Center  
10015 SW Terwilliger Blvd.  
Portland, Oregon 97219  
503.768.6929 phone  
503.768.6642 fax  
[abaldwin@lclark.edu](mailto:abaldwin@lclark.edu)

SERVICE LIST

<b>W TURLOCK IRRIGATION DISTRICT</b> RANDY BAYSINGER ASSISTANT GENERAL MANAGER	PO BOX 949 TURLOCK CA 95381-0949 rcbaysinger@tid.org
<b>W SIERRA CLUB LAW PROGRAM</b> GLORIA D SMITH (C)	85 SECOND STREET SAN FRANCISCO CA 94105 gloria.smith@sierraclub.org
<b>SEDCOR</b> RAYMOND BURSTEDT PRESIDENT	625 HIGH ST NE, STE 200 SALEM OR 97301 rburstedt@sedcor.com
<b>W SALEM CHAMBER OF COMMERCE</b> MIKE MCLARAN CHIEF EXECUTIVE OFFICER	1110 COMMERCIAL ST SE SALEM OR 97301 mike@salemchamber.org; jason@salemchamber.org

**W RICHARDSON & O'LEARY PLLC**  
PETER J RICHARDSON (C) PO BOX 7218  
BOISE ID 83707  
peter@richardsonandoleary.com

**W RICHARDSON & O'LEARY**  
GREGORY MARSHALL ADAMS (C) PO BOX 7218  
ATTORNEY BOISE ID 83702  
greg@richardsonandoleary.com

**W RENEWABLE NORTHWEST PROJECT**  
KEN DRAGOON 917 SW OAK, SUITE 303  
PORTLAND OR 97205  
ken@rnp.org

**PUBLIC UTILITY COMMISSION**  
MAURY GALBRAITH PO BOX 2148  
SALEM OR 97308  
maury.galbraith@state.or.us

**PORTLAND GENERAL ELECTRIC**  
PATRICK G HAGER (C) 121 SW SALMON ST 1WTC0702  
MANAGER - REGULATORY AFFAIRS PORTLAND OR 97204  
pge.opuc.filings@pgn.com  
DENISE SAUNDERS (C) 121 SW SALMON ST - 1WTC1711  
ASST GENERAL COUNSEL PORTLAND OR 97204  
denise.saunders@pgn.com

**W PNGC POWER**  
JOHN PRESCOTT 711 NE HALSEY  
PRESIDENT AND CEO PORTLAND OR 97232  
jprescott@pngcpower.com

**W PHYSICIANS FOR SOCIAL RESPONSIBILITY-OREGON CHAPTE**  
CATHERINE THOMASSON 1227 NE 27TH #5  
CLIMATE CHANGE CHAIR OREGON PORTLAND OR 97232  
PSR thomassonc@comcast.net

**W PACIFICORP ENERGY**  
PETE WARNKEN 825 NE MULTNOMAH - STE 600  
MANAGER, IRP PORTLAND OR 97232  
pete.warnken@pacificorp.com

**W PACIFIC POWER & LIGHT**  
JORDAN A WHITE 1407 W. NORTH TEMPLE, STE 320  
SENIOR COUNSEL SALT LAKE CITY UT 84116  
jordan.white@pacificorp.com

**W PACIFIC ENVIRONMENTAL ADVOCACY CENTER**  
AUBREY BALDWIN (C) 10015 SW TERWILLIGER BLVD  
STAFF ATTORNEY/CLINICAL PORTLAND OR 97219  
PROFESSOR abaldwin@lclark.edu

**W PACIFIC ENVIRONMENTAL ADVOCACY CENTER**  
ALLISON LAPLANTE (C) 10015 SW TERWILLIGER BLVD

PORTLAND OR 97219  
laplante@lclark.edu

**W OREGON SIERRA CLUB**  
IVAN MALUSKI

1821 SE ANKEY ST  
PORTLAND OR 97214  
ivan.maluski@sierraclub.org

**W OREGON FOREST INDUSTRIES COUNCIL**  
RAY WILKESON

PO BOX 12826  
SALEM OR 97309  
ray@ofic.com

**W OREGON ENVIRONMENTAL COUNCIL**  
JANA GASTELLUM  
PROGRAM DIRECTOR, GLOBAL WARMING

222 NW DAVIS ST, STE 309  
PORTLAND OR 97309-3900  
janag@oeconline.org

**W OREGON DEPARTMENT OF ENERGY**  
ANDREA F SIMMONS (C)

625 MARION ST NE  
SALEM OR 97301-3737  
andrea.f.simmons@state.or.us

**OREGON CATTLEMEN'S ASSOCIATION**  
KAY TEISL

3415 COMMERCIAL ST SE, SUITE 217  
SALEM OR 97302  
kayteisl@orcattle.com

**OREGON AFL-CIO**  
JOHN BISHOP

1635 NW JOHNSON ST  
PORTLAND OR 97209  
jbishop@mbjlaw.com

**W NW INDEPENDENT POWER PRODUCERS**

ROBERT D KAHN  
EXECUTIVE DIRECTOR

1117 MINOR AVENUE, SUITE 300  
SEATTLE WA 98101  
rkahn@nippc.org

**W NORTHWEST PIPELINE GP**  
JANE HARRISON (C)  
MGR-MARKETING SERVICES

295 CHIPETA WAY  
SALT LAKE CITY UT 84158  
jane.f.harrison@williams.com

BRUCE REEMSNYDER (C)  
SENIOR COUNSEL

295 CHIPETA WAY  
SALT LAKE CITY UT 84108  
bruce.reemsnyder@williams.com

**NORTHWEST FOOD PROCESSORS ASSOCIATION**

DAVID ZEPPONI  
PRESIDENT

8338 NE ALTERWOOD RD, STE 160  
PORTLAND OR 97220  
pbarrow@nwfp.org

**W NORTHWEST ENVIRONMENTAL DEFENSE CENTER**

	MARK RISKEDAHL	10015 SW TERWILLIGER BLVD PORTLAND OR 97219 msr@nedc.org
<b>W</b>	<b>NORTHWEST ENERGY COALITION</b> STEVEN WEISS SR POLICY ASSOCIATE	4422 OREGON TRAIL CT NE SALEM OR 97305 steve@nwenergy.org
	<b>INDUSTRIAL CUSTOMERS OF NORTHWEST UTILITIES</b> MICHAEL EARLY EXECUTIVE DIRECTOR	1300 SW 5TH AVE, STE 1750 PORTLAND OR 97204-2446 mearly@icnu.org
	<b>IBEW LOCAL 125</b> MARCY PUTMAN POLITICAL AFFAIRS & COMMUNICATION REPRESENTATIVES	17200 NE SACRAMENTO STREET PORTLAND OR 97230 marcy@ibew125.com
	<b>IBERDROLA RENEWABLES, INC</b> KEVIN LYNCH	1125 NW COUCH ST STE 700 PORTLAND OR 97209 kevin.lynch@iberdrolausa.com
	TOAN-HAO NGUYEN	1125 NW COUCH ST PORTLAND OR 97209 toan.nguyen@iberdrolausa.com
<b>W</b>	<b>FRIENDS OF COLUMBIA GORGE</b> MICHAEL LANG (C)	522 SW FIFTH AVENUE, SUITE 720 PORTLAND OR 97204 michael@gorgefriends.org
<b>W</b>	<b>ESLER STEPHENS &amp; BUCKLEY</b> JOHN W STEPHENS (C)	888 SW FIFTH AVE STE 700 PORTLAND OR 97204-2021 stephens@eslerstephens.com; mec@eslerstephens.com
<b>W</b>	<b>ECUMENICAL MINISTRIES OF OREGON</b> JAMES EDELSON	415 NE MIRIMAR PL PORTLAND OR 97232 edelson8@comcast.net
<b>W</b>	<b>ECUMENICAL MINISTRIES OF OREGON</b> JENNY HOLMES ENVIRONMENTAL MINISTRIES DIRECTOR	0245 SW BANCROFT, SUITE B PORTLAND OR 97239 jholmes@emoregon.org
	<b>DEPARTMENT OF JUSTICE</b> STEPHANIE S ANDRUS (C) ASSISTANT ATTORNEY GENERAL	REGULATED UTILITY & BUSINESS SECTION 1162 COURT ST NE SALEM OR 97301-4096 stephanie.andrus@state.or.us

**DAVISON VAN CLEVE**  
IRION A SANGER (C)  
ASSOCIATE ATTORNEY

333 SW TAYLOR - STE 400  
PORTLAND OR 97204  
ias@dvclaw.com

**W DAVIS WRIGHT TREMAINE LLP**  
JOHN DILORENZO

1300 SW FIFTH AVE, STE 2300  
PORTLAND OR 97201  
johndilorenzo@dwt.com

MARK P TRINCHERO

1300 SW FIFTH AVE STE 2300  
PORTLAND OR 97201-5682  
marktrincher@dwt.com

**W COLUMBIA RIVERKEEPER**  
LAUREN GOLDBERG (C)

724 OAK STREET  
HOOD RIVER OR 97031  
lauren@columbiariverkeeper.org

**W COLUMBIA CORRIDOR ASSOCIATION**  
CORKY COLLIER

PO BOX 55651  
PORTLAND OR 97238  
corky@columbiacorridor.org

**W CLACKAMAS COUNTY BUSINESS ALLIANCE**  
BURTON WEAST  
EXECUTIVE DIRECTOR

300 OSWEGO POINTE DR, STE 220  
LAKE OSWEGO OR 97034  
burton@ccba.biz

**W CITY OF PORTLAND - PLANNING & SUSTAINABILITY**  
MICHAEL ARMSTRONG (C)  
SUSTAINABILITY MANAGER

1900 SW 4TH AVE, STE 7100  
PORTLAND OR 97201  
michael.armstrong@portlandoregon.gov

DAVID TOOZE (C)  
SENIOR ENERGY SPECIALIST

1900 SW 4TH STE 7100  
PORTLAND OR 97201  
david.tooze@portlandoregon.gov

**W CITY OF PORTLAND - CITY ATTORNEY'S OFFICE**  
BENJAMIN WALTERS (C)  
CHIEF DEPUTY CITY ATTORNEY

1221 SW 4TH AVE - RM 430  
PORTLAND OR 97204  
ben.walters@portlandoregon.gov

**W CITIZENS' UTILITY BOARD OF OREGON**  
GORDON FEIGNER (C)  
ENERGY ANALYST

610 SW BROADWAY, SUITE 308  
PORTLAND OR 97205  
gordon@oregoncub.org

ROBERT JENKS (C)  
EXECUTIVE DIRECTOR

610 SW BROADWAY STE 308  
PORTLAND OR 97205  
bob@oregoncub.org

G. CATRIONA MCCracken (C)

610 SW BROADWAY - STE 308

	LEGAL COUNSEL/STAFF ATTY	PORTLAND OR 97205 catriona@oregoncub.org
<b>W</b>	<b>CABLE HUSTON BENEDICT HAAGENSEN &amp; LLOYD LLP</b> RICHARD LORENZ (C)	1001 SW FIFTH AVE - STE 2000 PORTLAND OR 97204-1136 rlorenz@cablehuston.com
<b>W</b>	<b>CABLE HUSTON BENEDICT ET AL</b> J LAURENCE CABLE (C)	1001 SW 5TH AVE STE 2000 PORTLAND OR 97204-1136 lcable@cablehuston.com
	<b>BOMA PORTLAND</b> SUSAN STEWARD EXECUTIVE DIRECTOR	200 SW MARKET, SUITE 1710 PORTLAND OR 97201 susan@bomaportland.org
<b>W</b>	<b>ASSOCIATED OREGON INDUSTRIES</b> JOHN LEDGER	1149 COURT ST NE SALEM OR 97301 johnledger@aoi.org
<b>W</b>	<b>*OREGON DEPARTMENT OF ENERGY</b> KIP PHEIL (C) SENIOR POLICY ANALYST	625 MARION ST NE - STE 1 SALEM OR 97301-3737 kip.pheil@state.or.us
	VIJAY A SATYAL (C) SENIOR POLICY ANALYST	625 MARION ST NE SALEM OR 97301 vijay.a.satyal@state.or.us
<b>W</b>	<b>*DEPARTMENT OF JUSTICE</b> JANET L PREWITT (C) ASSISTANT AG	NATURAL RESOURCES SECTION 1162 COURT ST NE SALEM OR 97301-4096 janet.prewitt@doj.state.or.us
<b>W</b>	BRUCE A KASER	PO BOX 958 SILVERTON OR 97381-0958 brucekaser@comcast.net