



Portland General Electric Company
121 SW Salmon Street • Portland, Oregon 97204

January 17, 2012

Via Electronic Filing and U.S. Mail

Oregon Public Utility Commission
Attention: Filing Center
550 Capitol Street NE, #215
PO Box 2148
Salem OR 97308-2148

Re: LC 48

Attention Filing Center:

Enclosed for filing in the above-captioned docket are an original and two copies of:

- **MOTION FOR EXTENSION OF TIME TO FILE ITS NEXT INTEGRATED RESOURCE PLAN**

This is being filed by electronic mail with the Filing Center.

An extra copy of the cover letter is enclosed. Please date stamp the extra copy and return to me in the envelope provided.

Thank you in advance for your assistance.

Sincerely,

A handwritten signature in black ink, appearing to read "V. Denise Saunders".

V. DENISE SAUNDERS
Associate General Counsel

VDS:cbm
Enclosures
cc: LC 48 Service List (w/enclosures)

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON
DOCKET NO. LC 48**

In the Matter of PORTLAND GENERAL ELECTRIC COMPANY 2009 Integrated Resource Plan.	PGE MOTION FOR EXTENSION OF TIME TO FILE ITS NEXT INTEGRATED RESOURCE PLAN
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Pursuant to OAR 860-027-0400(3), Portland General Electric Company (PGE) requests an extension of up to one year, until November 23, 2013, to file its next Integrated Resource Plan (IRP). As discussed below, an extension is consistent with the Commission’s competitive bidding rules and in the public interest because (1) PGE does not intend to take any new significant resource actions for at least two years after its next IRP is due (other than those acknowledged in the 2009 IRP); (2) an extension will allow PGE to incorporate the results of its forthcoming RFPs into the next IRP; and (3) an extension will allow PGE and its stakeholders more time to discuss potential replacement alternatives for the Boardman coal plant.

Discussion

PGE’s 2009 IRP was acknowledged with requirements by the Commission on November 23, 2010. As required by OAR 860-027-0400(8), PGE submitted an annual update on November 23, 2011. OAR 860-027-0400(3) requires PGE to file its next IRP within two years of its 2009 IRP acknowledgment order. However, the rule also provides that “if an energy utility does not intend to take any significant resource action for at least two years after its next IRP is due, the energy utility may request an extension of its filing date from the Commission.” Other than the actions that PGE is implementing pursuant to its 2009 IRP, PGE does not intend to take any new significant resource actions before 2016 – at least two years after its next IRP would be due. PGE would prefer to focus

on acquiring the resources identified in its 2009 IRP before determining if any new resource actions are warranted in the next IRP. In addition, as indicated in the 2009 IRP Update, PGE is experiencing lower retail loads due to a continuing slow economic recovery and higher five year opt-outs. These factors also decrease the need for new resource actions beyond those identified in our acknowledged IRP Action Plan before 2016 and provide flexibility with regard to the timing for the next IRP.

Over the next year, PGE will conduct RFPs to acquire new capacity, energy and renewable resources identified in its 2009 IRP. The results of these RFPs could significantly affect PGE's resource planning moving forward. It would be difficult to conduct a new IRP until our current procurement processes are farther along, as those results will influence both the amount and timing of any future resource need, as well as the evaluation of candidate portfolios to meet such need. An extension of time for PGE to file its next IRP will allow PGE to incorporate the results of its RFPs into its next IRP analysis.

Finally, as part of its 2009 IRP process, PGE committed to work with its stakeholders in the next IRP process to evaluate and consider carbon-reduction options for replacement power for Boardman in 2021. Delaying the next IRP would allow more time for these discussions to progress. In addition, assessing Boardman replacement options in an IRP that is submitted closer in time to when such actions will be implemented will allow for a better informed analysis and better decision-making.

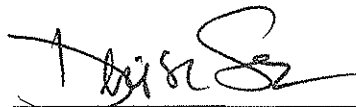
PGE has consulted with and confirmed that Commission Staff, Oregon Department of Energy, Citizens' Utility Board, Industrial Customers of Northwest Utilities, Renewable Northwest Project, NW Energy Coalition, and Oregon Environmental Council have no objection to providing a one-year extension for filing the next IRP. If this Motion is granted, then, consistent with OAR 860-027-0400(8), PGE will file a second IRP Update in November 2012.

Conclusion

For the reasons discussed above, PGE respectfully requests that the Commission allow PGE to extend the time for filing its next IRP until November 23, 2013.

DATED this ~~17~~¹⁸ day of January, 2012.

Respectfully submitted,

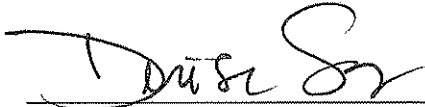


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CERTIFICATE OF SERVICE

I hereby certify that I have this day caused **PGE MOTION FOR EXTENSION OF TIME TO FILE ITS NEXT INTEGRATED RESOURCE PLAN** to be served by electronic mail to those parties whose email addresses appear on the attached service list, and by First Class US Mail, postage prepaid and properly addressed, to those parties on the attached service list who have not waived paper service from OPUC Docket No. LC 48.

Dated at Portland, Oregon, this 17th day of January, 2012.



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