

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

LC48

In the Matter of)	WRA MOTION REQUESTING
)	ACCEPTANCE OF LATE-
PORTLAND GENERAL ELECTRIC)	FILED REPLY COMMENTS
)	
2009 Integrated Resource Plan)	

The Willard Rural Association (“WRA”) electronically filed reply comments concerning the above docket at approximately 6:29 p.m. on September 1. Portland General Electric (“PGE”) may have contacted the Oregon Public Utility Commission (“PUC”) about the WRA’s late filing and service. It is not known if PGE opposes the present motion.

The founder of the WRA filed the reply comments on behalf of family interests and others in east Marion County who will lose business revenue and other economic opportunities if the Cascade Crossing is built by PGE. The founder was involved in an unrelated matter in Seattle, Washington, during much of the day on September 1. Because the July 8 administrative order did not mention a 5:00 p.m. deadline for electronic filing, he mistakenly presumed that the PUC rule was the same as federal filings. Because of this mistake, his assistant was instructed to electronically file the reply comments late in the day after he returned from Seattle. It was also mistakenly believed that the PUC’s filing center automatically distributes electronic filings to all parties on the distribution list. This may or may not be the case. Because the names on the service list have been changing, an assistant was asked to separately e-mail a courtesy copy of the reply comments the next day to as many names as could be reasonably identified from prior PUC filings.

We apologize for the error. However, we respectfully ask that the PUC accept the reply comments, even though filed late. We believe the comments provide the PUC with additional factual information for consideration, including, in part:

1. PGE’s failure to show need or dispute that total electrical energy consumption in PGE’s service area has not grown since 1998;
2. PGE’s failure to demonstrate clearly that the project meets Oregon’s “Least Cost” standards;
3. If the Cascade Crossing carries as much power into Salem as PGE alleges it will, PGE’s failure to fully inform the PUC about the total cost of other line

upgrades that will be needed in the Willamette Valley between Salem and Oregon City;

4. PGE's failure to inform the PUC that new third party generation sources are indicating to Oregon DOE that they will connect to the BPA system in lieu of the Cascade Crossing;
5. PGE's failure to disclose to the PUC that BPA is completing a major power line in eastern Oregon for the purpose of addressing new wind power interconnections and alleged shortfalls in east-west transmission capacity;
6. PGE's nondisclosure that it recently consented to a \$375,000 civil penalty by FERC for underreporting the amount of available transmission capacity on PGE-owned lines during a six year period from September 2002 to September 2008.

In order to allow the PUC and the public to fully vet the need and economic merit of the Cascade Crossing Project, the WRA respectfully asks that its comments be docketed, even though electronically filed 1 hour and 29 minutes after 5:00 p.m. The WRA sincerely apologizes for the late filing and also apologizes for any inconvenience caused. Thank you for your consideration.

DATED this 7th day of September 2010.

Respectfully Submitted,

A handwritten signature in blue ink that reads "Bruce A. Kaser" followed by a small "ds" subscript.

Bruce A. Kaser
Willard Rural Association
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Certificate of Service

I certify that I have this day served the foregoing WRA Motion Requesting Acceptance of Late-Filed Reply Comments upon all parties of record in LC 48 by delivering a copy by electronic mail to all parties as indicated on the service list compiled by the OPUC.

Dated this 7th day of September 2010.

Respectfully Submitted,

A handwritten signature in blue ink that reads "Bruce A. Kaser" followed by a small "ds" in the right margin.

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