

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**LC 48**

In the Matter of	)	
	)	
PORTLAND GENERAL ELECTRIC COMPANY	)	MOTION OF POWER RESOURCES COOPERATIVE FOR LEAVE TO INTERVENE OUT OF TIME
2009 Integrated Resource Plan	)	

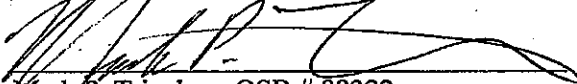
The Power Resources Cooperative ("PRC") hereby moves for permission to intervene out of time. PRC's Petition to Intervene is filed concurrent with this Motion. Granting PRC intervenor status at this juncture in the proceeding will not broaden the issues, burden the record or unreasonably delay the proceeding, nor prejudice the rights of other parties to the proceeding. PRC's participation in this proceeding will focus primarily on Portland General Electric's ("PGE") plans relating to the Boardman facility, an issue already squarely within the ambit of this proceeding.

WHEREFORE, PRC respectfully requests moves for permission to intervene out of time.

DATED this 22<sup>nd</sup> day of April, 2010.

Respectfully submitted,

DAVIS WRIGHT TREMAINE LLP



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Attorneys for Power Resources Cooperative

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**LC 48**

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In the Matter of	)	
	)	
PORTLAND GENERAL ELECTRIC COMPANY	)	PETITION TO INTERVENE & WAIVER OF PAPER SERVICE OF POWER RESOURCES COOPERATIVE
2009 Integrated Resource Plan	)	

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Pursuant to ORS 756.525 and OAR § 860-012-0001, the Power Resources Cooperative ("PRC") hereby submits this Petition to Intervene and Waiver of Paper Service in the above-captioned proceeding. In support of this Petition, PRC states as follows:

1. The name and address of Petitioner as a party of record in this proceeding is:

John Prescott  
Executive Vice President & General Manager  
Power Resources Cooperative  
711 N.E. Halsey Street  
Portland, Oregon 97232  
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2. Mark Trincherro and John DiLorenzo of Davis Wright Tremaine LLP will represent PRC in this proceeding. All documents related to this proceeding should be served on PRC's attorneys at the following address:

Mark Trincherro  
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3. Originally organized as Pacific Northwest Generating Cooperative, PRC is an electrical cooperative with 13 members, each of which is also an electrical cooperative. PRC is a 10% owner of the Boardman coal plant, of which Portland General Electric ("PGE") is both the majority owner and the operator.
4. PRC has a direct interest in PGE's Integrated Resource Plan to the extent that it addresses the future operation of Boardman.
5. PRC has information that will likely be helpful to the Commission concerning PGE's maintenance and operation of Boardman as well as differing economic perspectives from those advanced by PGE in regard to Boardman, assessments of the requirements of putting Boardman into compliance with applicable environmental laws, and practical experience related to the difficulties and probable additional costs of attempting to install the proposed facilities at Boardman.
6. PRC's participation in this proceeding will not unreasonably broaden the issues, burden the record, nor delay the proceeding.

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WHEREFORE, PRC respectfully requests leave to intervene and requests all the rights of a party in this proceeding.

DATED this 22<sup>nd</sup> day of April, 2010.

Respectfully submitted,

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**CERTIFICATE OF SERVICE**

I CERTIFY that I have on this day served the foregoing documents **MOTION OF POWER RESOURCES COOPERATIVE FOR LEAVE TO INTERVENE OUT OF TIME** and **POWER RESOURCES COOPERATIVE'S PETITION TO INTERVENE & WAIVER OF PAPER SERVICE** on all parties of the record listed on the Service list below, in this proceeding via electronic mail and/or via mailing a copy properly addressed with the first class postage prepaid.

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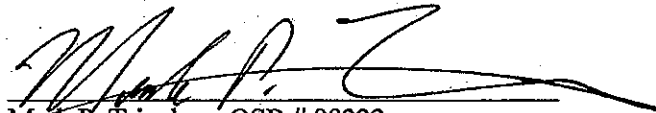
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Dated in Portland, Oregon, this 20<sup>th</sup> day of April, 2010.

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