



## Willard Rural Association

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BRUCE A. KASER  
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April 22, 2010

VIA EMAIL & FIRST CLASS MAIL

Public Utility Commission of Oregon  
550 Capitol St. NE, #215  
P.O. Box 2148  
Salem, OR 97308-2148

Re: In the matter of Portland General Electric Company 2009 Integrated Resource Plan  
Docket No. LC 48

Enclosed are an original and a copy of the Willard Rural Association's Motion to Intervene Out of Time and Petition to Intervene in the above captioned matter.

Very Truly Yours,

Bruce A. Kaser



**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**LC48**

In the Matter of	)	<b>UNCONTESTED MOTION TO</b>
	)	<b>INTERVENE OUT OF TIME</b>
PORTLAND GENERAL ELECTRIC	)	<b>(EXPEDITED</b>
	)	<b>CONSIDERATION IS</b>
2009 Integrated Resource Plan	)	<b>REQUESTED)</b>
	)	

1. The Willard Rural Association (“WRA”) hereby moves for permission to intervene out of time. The WRA’s Petition to Intervene is attached to this motion.
2. On April 14, 2010, the WRA notified the parties on the service list that the WRA intended to file this motion because it had new information relating to Portland General Electric’s (“PGE”) 2009 Integrated Resource Plan (“2009 IRP”) that is not before the Oregon Public Utility Commission (“PUC”). The WRA asked for comments or objections by the parties on or before April 21, 2010. No intervening party objected or provided comments.
3. The WRA was contacted by PGE’s counsel on April 15 to discuss the WRA’s grounds for intervention. PGE informed the WRA that PGE had no objection to the WRA’s late intervention.
4. The WRA will be commenting on PGE’s “Cascade Crossing” portion of the 2009 IRP filing. The WRA is a public interest organization that serves and represents agricultural businesses and individual rate payers in east Marion County who will be negatively impacted by the Cascade Crossing project, if it is built.

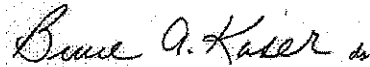
5. The founder of the WRA has requested evidence from PGE that supports PGE's published statements that Oregon electrical energy consumption will grow at the rate of 2.2% per year for the next twenty years – which is crucial to whether the Cascade Crossing Project is needed. PGE has not been responsive to these requests. Moreover, PGE does not appear to be following PUC orders and IRP guidelines concerning the development of transmission line projects. The WRA also has evidence, not in the 2009 IRP that (1) indicates Oregon electrical energy consumption has not grown for the last ten years or more; (2) PGE's competition is projecting very little future growth in Oregon electrical energy consumption; and (3) PGE's maximum peak load has not exceeded its record peak set nearly 12 years ago, in December 1998.

6. The WRA also wishes to submit comments and evidence that PGE is seeking acknowledgement of a plan that fails to follow Oregon PUC guidelines with respect to "least-cost" planning for Oregon rate payers. For example, the 2009 IRP sets forth a series of case studies, 60% of which indicate that *not* building the Cascade Crossing (500kV, double-circuit), and continuing to use BPA transmission capacity, is a better cost solution for Oregon rate payers. These case studies are based on PGE's overall total estimated project cost that is based on many assumptions. Among other things, PGE omitted that it intends to add a 30+ mile section to the project. At PGE's current estimate of approximately 3.9 million per mile in average cost, adding 30 miles may skew PGE's case studies in a way that further indicates the project is not consistent with "least cost" planning.

7. It is respectfully submitted that granting this motion will help ensure that the Cascade Crossing portion of the 2009 IRP receives a more thorough review by the Oregon PUC.

8. The WRA is not requesting an adjustment to the schedule entered by Administrative Law Judge Shani Pines on April 15, 2010. The WRA respectfully submits that its late intervention will not broaden the issues, burden the record, or create unreasonable delay in the proceeding, nor will it prejudice the rights of any other parties to the proceeding.

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



Bruce A. Kaser  
Willard Rural Association  
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Silverton, OR 97381-0958  
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**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**LC48**

In the Matter of	)	<b>PETITION TO INTERVENE</b>
	)	
PORTLAND GENERAL ELECTRIC	)	
	)	
2009 Integrated Resource Plan	)	

1. The Willard Rural Association (“WRA”) respectfully petitions to intervene in this proceeding.
2. The contact information for the petitioner is:  
  
Bruce A. Kaser  
P.O. Box 958  
Silverton, Oregon 97381-0958  
PHONE: 206-909-7928  
E-MAIL ADDRESS: brucekaser@comcast.net
3. The WRA will not be represented by counsel.
4. The WRA is an association with 12 interested members who own property and agricultural businesses in east Marion County, most of whom are also PGE rate payers. The purpose of the WRA is to both represent member interests and share information concerning matters that affect local agricultural business interests in east Marion County.
5. The nature and extent of petitioner’s interest in the proceeding is as follows:  
  
Agricultural businesses in east Marion County are likely to be negatively impacted by the “Cascade Crossing” portion of PGE’s 2009 Integrated Resource Plan

("2009 IRP") if the current version of the IRP is acknowledged (including PGE's recently filed addendum to the 2009 IRP). We have an interest in ensuring that the Cascade Crossing portion of the plan receives a thorough and complete vetting, in accordance with PUC guidelines, and in ensuring that our comments and information will be given appropriate consideration in the official record of this proceeding.

6. The WRA intends to raise the following issues in the proceeding:

- a. PGE did not follow the guidelines required by the PUC in seeking acknowledgment of the 2009 IRP as it relates to the Cascade Crossing project.
- b. PGE omitted material information in the 2009 IRP relating to the Cascade Crossing Project.
- c. PGE has not established "need" for the Cascade Crossing project and other related transmission projects set forth in the 2009 IRP.

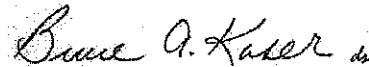
7. Petitioner has no special knowledge or expertise that will assist the PUC in resolving issues in the proceeding.

8. Based on the information provided above, and in accordance with the Commission's rules of procedure, the WRA respectfully requests permission to participate in this proceeding as an Intervenor.

9. Petitioner does not intend to undertake any action that will alter the existing schedule issued by Administrative Law Judge Shani Pines on April 15, 2010. The WRA will not unreasonably broaden the issues, burden the record, file unnecessary motions, or cause unreasonable delay to the proceeding.

10. . . Petitioner hereby agrees to accept service by electronic mail and waives other forms of service.

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

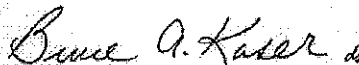
A handwritten signature in cursive script that reads "Bruce A. Kaser".

Bruce A. Kaser  
Willard Rural Association  
P.O. Box 958  
Silverton, OR 97381-0958  
brucekaser@comcast.net

**Certificate of Service**

I certify that I have this day served the foregoing Motion to Intervene Out of Time and Petition to Intervene 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 22nd day of April 2010.

A handwritten signature in cursive script that reads "Bruce A. Kaser" followed by a small "ds" or similar mark.

Bruce A. Kaser  
Willard Rural Association  
P.O. Box 958  
Silverton, OR 97381-0958  
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**SERVICE LIST  
OPUC DOCKET # LC 48**

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