

Public Utility Commission of Oregon
550 Capitol St NE #215
PO 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 Oregonians for Food and Shelter's Motion
to Intervene Out of Time, Petition to Intervene and comments in the above captioned
matter.

Sincerely,

A handwritten signature in cursive script, appearing to read "Terry S. Allen". The signature is written in black ink and is centered on the page.

Signed

BEFORE THE PUBLIC UTILITY
COMMISSION

OF OREGON

LC 48

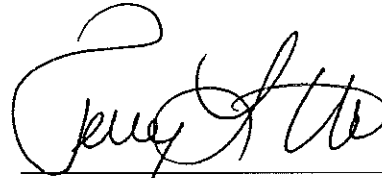
In the matter of Portland General)	
Electric Company 2009)	
Integrated Resource Plan filing)	MOTION TO INTERVENE
)	OUT OF TIME
)	
<hr/>		

Oregonians for Food and Shelter hereby moves to for permission to intervene out of time. Oregonians for Food and Shelter's Petition to Intervene is attached to this Motion.

Granting this petition for late intervention will not broaden the issues, burden the record or unreasonably delay the proceeding nor prejudice the rights of other parties to the proceeding.

Oregonians for Food and Shelter will be commenting on Portland General Electric Company's Boardman 2020 Plan portion of the 2009 Integrated Resource Plan filing, an existing issue. As a Portland General Electric Company customer, we have an interest in ensuring that the Boardman 2020 Plan receives a thorough and complete vetting.

Dated: May 18, 2010



Representative of Oregonians for
Food and Shelter

BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON

LC 48

In the matter of Portland General)
Electric Company 2009) PETITION TO INTERVENE
Integrated Resource Plan filing)
)
)
_____)

NAME OF PETITIONER: Terry Witt
Executive Director
Oregonians for Food and Shelter

ADDRESS: 1149 Court St. SE, Suite 110
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PHONE NUMBER: 503-370-8092

FAX NUMBER: 503-370-8565

E-MAIL ADDRESS: Terry@ofsonline.org

NAME OF COUNSEL FOR PETITIONER: none

COUNSEL'S ADDRESS:

COUNSEL'S PHONE NUMBER:

COUNSEL'S FAX NUMBER:

COUNSEL'S E-MAIL ADDRESS:

PLEASE SEND COPIES TO: Organization and address above

IF THE PETITIONER IS AN ORGANIZATION, THE NUMBER OF MEMBERS IN
AND THE PURPOSES OF THE ORGANIZATION:

NATURE AND EXTENT OF THE PETITIONER'S INTEREST IN THE
PROCEEDING:

Oregonians for Food and Shelter will be commenting on Portland General
Electric Company's Boardman 2020 Plan portion of the 2009 Integrated Resource Plan
filing, an existing issue. As a Portland General Electric Company customer and

membership organization with members who are PGE customers, we have an interest in ensuring that the Boardman 2020 Plan receives a thorough and complete vetting and in ensuring that our comments are given appropriate consideration in the official record of the proceeding.

THE ISSUES THE PETITIONER INTENDS TO RAISE AT THE PROCEEDING:

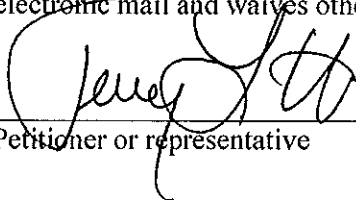
None specifically. However, our comments will not broaden the issues, burden the record, or unreasonably delay the proceeding.

ANY SPECIAL KNOWLEDGE OR EXPERTISE OF THE PETITIONER THAT WOULD ASSIST THE COMMISSION IN RESOLVING THE ISSUES IN THE PROCEEDING:

None specifically.

Based on the information provided above in accordance with the Commission's rules of procedure, I request to participate in this proceeding as an intervenor. I, or the organization that I represent, will not unreasonably broaden the issues, burden the record, or unreasonably delay the proceeding. OAR 860-013-0021.

Pursuant to OAR 860-013-0070 (4), Petitioner hereby agrees to accept service by electronic mail and waives other forms of service provided in OAR 860-013-0073.



Petitioner or representative

5/18/2010

Date



OREGONIANS FOR FOOD & SHELTER

1149 Court Street NE ♦ Suite 110 ♦ Salem, Oregon 97301-4030

A non-profit coalition to promote the efficient production of quality food and fiber while protecting human health, personal property and the environment, through the integrated, responsible use of pest management products, soil nutrients and biotechnology.

Serving Oregon Since 1980

(503) 370-8092 • FAX: (503) 370-8565
www.ofsonline.org

May 18, 2010

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

Dear Commissioners:

As an intervenor in Portland General Electric's Integrated Resource Plan (LC 48), Oregonians for Food and Shelter, Inc. (OFS) would like to express support for PGE's 2020 plan for its Boardman Coal Plant. OFS strongly urges the Oregon Public Utility Commission to provide the necessary acknowledgements required for PGE to legally pursue its 2020 plan for the Boardman Plant, or the alternative plan to install more extensive emission controls to keep the plant operating until 2040 as set forth in its revised IRP.

OFS is a pro-active, member-funded, grass roots coalition which works to protect the rights of natural resource based businesses in Oregon. Our primary focus is protecting those who responsibly use pest management products, soil nutrients and biotechnology from government over-regulation, however, we also get involved in a variety of other issues impacting farmers, foresters and urban businesses relating to natural resources. Energy is one of those critical issues.

Our organization is weighing in on this important matter because of the potential impact on the natural resource businesses here in the state. As the costs of doing business in this state (including affordable energy) continues to rise, the margins for many people working in the natural resources sector are becoming thinner and thinner. Over the past decade hundreds of small agriculture and forestry businesses have ceased to exist. It is critical that we not effectively price our members out of the market by causing sudden rate increases, as might happen with a rapid 2014 shutdown of Boardman.

The Boardman 2020 plan provides a balanced approach that includes an immediate and significant reduction in emissions from Boardman and a 10-year strategy for closing the plant and transitioning to new generation resources. It strikes the correct balance between environmental and economic concerns, and it is in the interest of natural resources businesses and all Oregonians to see this plan move forward.

On behalf of the entire OFS Board of Directors and thousands of OFS members across Oregon, I thank you for your consideration of our position on this important matter.

Sincerely,

Terry L. Witt
Executive Director

STAFF

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Jerry Butler
ASSOCIATE MEMBER
Sam Palacio
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CERTIFICATE OF SERVICE

I hereby certify that I have this day caused the foregoing **MOTION TO INTERVENE OUT OF TIME, PETITION TO INTERVENE and COMMENTS** 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: May 18, 2010

A handwritten signature in black ink, appearing to read "Jeffrey S. Allen". The signature is written in a cursive style with a large initial "J" and a long horizontal stroke at the end.

Signed

**W=Waive Paper
service**

**C=Confidential
HC=Highly Confidential**

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Sort by Company Name

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