Mr. Jim Lobdell Vice President, Power Operations and Resource Strategy Portland General Electric Company 121 SW Salmon Street Portland, OR 97204

Dear Mr. Lobdell:

Certain members of the public interest community, including to date, the Citizens' Utility Board ("CUB"), the Renewable Northwest Project, Angus Duncan, Oregon Environmental Council, and the NW Energy Coalition (the "Group"), have been in discussions with Portland General Electric Company ("PGE") about PGE's method of constructing Boardman candidate replacement resource portfolio options to be considered in the Oregon Public Utility Commission's ("OPUC") Integrated Resource Planning process related to the cessation of Boardman coal-fired operations. The Group and PGE have also been discussing the Group's support for cessation of Boardman coal-fired operations at the Oregon Department of Environmental Quality ("DEQ"), the Environmental Quality Commission ("EQC") and the OPUC. This letter represents the Group's understanding of its role with respect to these discussions, and should be read in the context of the corresponding letter of the same date from Jim Lobdell, PGE, to Bob Jenks, CUB dated October 22, 2010 (the "PGE Letter").

The Group supports a plan that is similar to PGE's BART III proposal that would cease coal-fired operations at Boardman no later than December 31, 2020 as a part of a comprehensive plan (the "Plan") that satisfies the Clean Air Act ("CAA") and makes significant emissions reductions, meets the least-cost/least-risk standard, and is accompanied by commitments to a good faith process, within PGE's next IRP process and sanctioned by the OPUC, to develop a limited number of carbon reduction candidate resource portfolio options for replacing Boardman upon cessation of its coal-fired operations, and meeting the anticipated resource requirements of the utility's customers. The portfolios will be designed to achieve the best combination of expected costs and associated risks and uncertainties for PGE and its customers, and also reduce the carbon footprint of the company's resource portfolio over time. The Group agrees that it will, in consultation with PGE, define specific CO₂ reduction targets on which these portfolios can be based. Such portfolios will be evaluated against other constructed resource portfolios developed during the IRP process.

The Group strongly believes that greenhouse gas and criteria pollutant reductions consistent with Oregon's climate goals and Clean Air Act standards are compatible with safe, reliable and affordable utility electricity service, and that PGE, in its disposition of Boardman and in its next IRP, can serve as a leader in achieving these outcomes, and providing a clean energy future for Oregon. We invite PGE to embrace this leadership position and would assist the company in realizing this vision.

The DEQ 2018 and PGE BART III proposals now under consideration have many similarities, but differ in their treatment of operating flexibility. We encourage DEQ to develop appropriately flexible emission limits—similar to the mercury rule—to accommodate the proposed control technology recommendations, while achieving significant emissions reductions under the CAA.

All members of the Group, including individuals speaking on behalf of the Group, will immediately:

- Work in good faith with PGE for adoption and implementation of the Plan. Members of the Group remain free to advocate at any time and in any process (including at the OPUC) for elimination of a 2040 date, or any date later than 2020, for terminating coal-fired operations at Boardman
- Advocate strongly for the Plan in comparison to other Boardman emission control options being considered in public and private forums and communications, including the following:
 - Department of Environmental Quality: Speak strongly in favor and/or file written comments at any additional hearings or comment periods prior to an EQC decision;
 - Environmental Quality Commission: Speak strongly in favor at hearings and public meetings where public comments on the Plan are taken and/or file written comments supportive of the Plan at the appropriate times;
 - Environmental Protection Agency: Speak strongly in favor at hearings and public meetings where public comments on the Plan (i.e., Boardman BART State Implementation Plan approval) are taken and/or file written comments supportive of the Plan at the appropriate times;
 - Oregon Public Utility Commission: Speak strongly in favor and/or file written comments supportive of the Plan, including the Boardman replacement power process described in the PGE Letter at appropriate scheduled times. The Group's advocacy will include seeking OPUC acknowledgment of the Boardman replacement power process.

Members of the Group will comment in other public venues, including print and broadcast media, strongly in favor of the Plan and consistent with the content of this letter and the PGE Letter, including co-authorship with PGE of a joint opinion editorial by the Group that will generally reflect the content of these letters, including speaking to the importance of the Plan to cease coal-fired operations at Boardman and the replacement resource process that will enable PGE's transition to a cleaner, low-carbon resource portfolio, to be filed with the Oregonian and other relevant news outlets prior to the EQC decision on this matter.

The Group commits to using its best efforts and to work in good faith and adhere to the OPUC's prevailing IRP guidelines and process.

Thank you for taking the time to engage in these discussions.

Sincerely,

Bob Jenks, Citizens' Utility Board

Rachel Shinslak

Sava Latton

Bel Maks

Andrea Durbin, Oregon Environmental Council

Rachel Shimshak, Renewable Northwest Project

Angus Duncan

Chapa C. DM.

Sara Patton, NW Energy Coalition



Portland General Electric Company

121 SW Salmon Street • Portland, Oregon 97204 (503) 464-2723 • Facsimile (503) 464-2222

October 22, 2010

James F. Lobdell

Vice President
Power Operations and Resource Strategy

Mr. Bob Jenks Executive Director Citizens' Utility Board of Oregon 610 SW Broadway, Suite 308 Portland, OR 97205

RE: PGE Boardman replacement resource planning process.

Dear Mr. Jenks:

Portland General Electric Company ("PGE") has been working with certain members of the public interest community (including to date, the Citizens' Utility Board ("CUB"), the Renewable Northwest Project, Angus Duncan, Oregon Environmental Council, and the NW Energy Coalition (the "Group")) to discuss PGE's public commitment to construct Boardman candidate replacement resource portfolio options to be considered in the Oregon Public Utility Commission's ("OPUC") Integrated Resource Planning process related to the cessation of Boardman coal-fired operations. The Group and PGE have also been discussing the Group's support for ceasing coal-fired operations at Boardman no later than December 31, 2020 as part of a comprehensive plan, as further described in the Group's letter from Bob Jenks of CUB to Jim Lobdell of PGE dated October 22, 2010 (the "Group Letter"). This letter represents PGE's understanding of its role with respect to these discussions.

Within the context of the Integrated Resource Planning Process ("IRP") and the guidelines adopted for that process by the OPUC, and in consideration of the Group's support as described in the Group Letter, and contingent upon EQC approval of BART III or a plan that is substantially similar to BART III and acceptable to PGE, PGE will:

- Lead an effort in its next IRP to develop a limited number of carbon reduction candidate resource portfolio options to meet anticipated utility resource requirements including the replacement of Boardman coal generation and designed to achieve the best combination of expected costs and associated risks and uncertainties for PGE and its customers and also reduce the carbon footprint of the company's resource portfolio over time ("CO₂ reduction portfolios"). Such portfolios will be evaluated against other constructed resource portfolios developed during the IRP process.
- Define CO₂ reduction portfolios as prospective supply and demand side resource options
 that are technically feasible and commercially available during the IRP planning period
 that could potentially be candidates for reducing portfolio carbon emissions and meet
 forecasted energy and capacity deficits related to the cessation of Boardman coal-fired
 operations and other resource requirements.
- Design in consultation with the Group the CO₂ reduction portfolios to meet specific CO₂ reduction targets to be defined by the Group.

- Allocate sufficient funding, not to exceed \$50,000 without PGE's prior approval, to be
 made available on a one-time basis for the sole purpose of securing technical consulting
 assistance services (to be selected jointly by PGE and the Group) to assist with
 development and evaluation of the potential candidate resource portfolios for Boardman.
- Initiate a limited number of workshops, designed to develop the CO₂ reduction portfolios during the next IRP process.
- Invite all IRP stakeholders, including OPUC and ODOE staff to the workshops.
- Affirm publicly that the process described above represents a commitment by PGE to use
 its best efforts to develop and evaluate carbon emission reduction portfolios that support
 Oregon's efforts to reduce greenhouse gas emissions while operating within the OPUC's
 least-cost/least-risk paradigm.
- Support the elimination of the DEQ BART Rule that now allows for continued coal-fired operations at Boardman through 2040, or the end of its economic life, upon occurrence of all of the following: (1) a revised Boardman BART/Reasonable Progress rule acceptable to PGE has been adopted by EQC; (2) such Boardman BART/Reasonable Progress rule has been included in Oregon's State Implementation Plan (SIP); and (3) the Boardman BART/Reasonable Progress portion of the Oregon SIP has been finally approved by the Environmental Protection Agency and becomes binding on Boardman. Until such final approval by EPA of the Boardman BART/Reasonable Progress portion of the Oregon SIP, PGE is free to advocate for a 2040 backstop option should EQC and EPA not approve a BART rule that is acceptable to the company.

PGE will comment, consistent with the content of this letter and the Group Letter, in other public venues, including print and broadcast media strongly in favor of this process, including coauthorship with the Group of a joint opinion editorial speaking to the importance of these efforts to cease coal-fired operations at Boardman, and the replacement resource process that all parties hope will enable PGE's transition to a lower carbon least-cost resource portfolio, to be filed with the Oregonian and other relevant news outlets prior to the EQC decision on this matter.

PGE understands that nothing in this document will require the company to take any action that is in conflict with the OPUC's IRP Guidelines and process.

Thank you for taking the time to engage in these discussions.

Sincerely,