Portland General Electric
121 SW Salmon Street • Portland, OR 97204
portlandgeneral.com

February 1, 2025

VIA DIRECT UPLOAD TO CASE #4240019

City of Portland Hearings Office
Attn: Marisha Childs
1900 SW 4th Avenue, Suite 3100
Portland, OR 97201

Re: Portland General Electric Company ("PGE") Harborton Reliability Project
Case No. LU 24-041109 CU EN GW

Hearings Officer Childs:

Portland General Electric (PGE) is well aware that co-locating transmission wires on Bonneville Power Administration (BPA) infrastructure is not a viable project alternative. We explained this in our application materials. Due to skepticism from project opponents, we submit for the record the attached letter from BPA confirming that collocation of PGE's wires on BPA's towers in and near Forest Park is not feasible.

As we have documented in our land use application materials and stated during our public open houses, our project website, and during our presentation at the land use hearing, the proposed project is the only available option for meeting the project purpose and need.

Sincerely,

2/1/2025

X 

Randy Franks
Senior Project Manager
Signed by: E78181

Enclosure

Date: January 30, 2025

To: Real Property Management Section, TERR

From: Jeremy Nguyen – Technical Services, TELC (360) 619-6345

Subject: Engineering Review of R/W Use Permit

Application For:	PGE and BPA multi-party use on structures
Applicant:	PGE - **Shaun Foster, 503-464-7945**
Case No.:	N/A
TLM District:	Ross
BPA T-Line Span(s):	Rivergate-Keeler 1&2 No 1, 2/2 – 3/1

COMMENTS:

The request to determine if PGE and BPA lines may be compatible with a multi-circuit structure has been reviewed.

The parameters are as follows:
PGE requests to add (2) 230kV lines to an existing BPA double circuit. The location reviewed is at BPA's Rivergate-Keeler 1&2 line between 2/2 and 3/1.

The proposal is <u>not feasible</u>, below highlights some of the points of analysis:

- BPA's Rivergate-Keeler 1&2 line between 2/2 and 3/1 was designed to meet the National Electrical Safety Code (NESC) clearances. While this line meets NESC requirements in its existing state, there is not enough clearance to accommodate additional circuits, while maintaining NESC clearances
- The existing structures were not designed to accommodate any additional circuits

Further Engineering and Reliability analysis unknowns:

- BPA does not have an existing quadruple circuit structure design that would be feasible for this proposal. Some considerations include:
    - Design of this type of structure may not be achievable
    - Such a structure may not be an improvement over the use of separate structures:
        - A smaller total structural footprint may not be achievable
        - A narrower total Right-of-Way width may not be achievable
- It is unknown if a quadruple circuit structure would meet North American Electric Reliability Corporation (NERC) requirements.