

1 UNITED STATES DISTRICT COURT
2 FOR THE DISTRICT OF OREGON
3 PORTLAND DIVISION

4 **Case**

5 **David White, Pro Se**
6 **18965 NW Illahe St,**
7 **Portland OR.**

Complaint for \$30.0 million

8 **COMPLAINT AND**
9 **INJUNCTIVE RELIEF. JURY**
10 **TRIAL REQUESTED.**

11 dave@salmonprotectiondevice.com

12 **vs.**

13 **Defendant 1. (D1)**
14 **Maria M. Pope, in her capacity as**
15 **President and CEO of Portland**
16 **General Electric**

17 **Portland General Electric**
18 **1WTC0509**
19 **121 SW Salmon St.**
20 **Portland, OR 97204**

21
22
23
24
25 **Table of Authorities**

26 Loper Bright Enterprises v. Raimondo and Relentless, Inc. v. Department of
27 Commerce US Supreme Court Ruled on 6/28/2024 that courts can no
28 longer function as administrative law courts. They must be article III of the
29 US constitution courts.

30 Pagtalunan v. Galaza, 291 F.3d 639, 642 (9th Cir. 2002): Pagtalunan

31 was Pro Se and made numerous mistakes in filing his complaint, resulting
32 in the case being dismissed. However, upon appeal, the higher Court ruled
33 that the lower Court was in error because they did not give

34 allowance for Pagtalunan's lack of forml legal training.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28
29
30
31
32
33

INTRODUCTION

Plaintiff and all Class Action participants are customers of Portland General Electric (PGE). PGE is a federally licensed, multi-state agency, meaning that this Court has jurisdiction over this matter.

Respondent and all Class Action members notify the Court to convene this case as an Article III of the US Constitution court, per the U.S. Supreme Court ruling herein cited.

The US Supreme court on June 28th,2024 ruled in Loper Bright Enterprises

v. Raimondo and Relentless, Inc. v. Department of Commerce that courts can no longer convene as administrative law courts, governed by administrative law. They must be article III of the US Constitution courts, emphasizing law above procedure.

Defendants continue to raise rates for consumers to avoid raising rates to Industrial Data Centers.

<https://oregoncub.org/news/blog/pge-asks-for-even-more-rate-increases/2956/>

After an 18% increase in January, Defendants are requesting 7.4% more in 2025.

<https://www.opb.org/article/2024/02/29/portland-electric-proposes-2025-rate-hike-as-many-still-reel-from-january-bump/>

KOIN news has, if effect, concurred in numerous broadcasts.

1 When it comes to climate change, PGE is “politically incorrect” and
2 “woke,” based on deceptive United Nations (UN) research, aided and
3 abetted by corporate, mainstream media.

4 In a misguided attempt to reduce emissions, Electric Vehicles are
5 crashing the grid. Moreover, the average residence time of atmospheric
6 carbon dioxide is 150 years. This implies that any attempt to effect short-
7 term climate change by focusing on reducing emissions (such as EVs) is
8 futile.

9 Maybe it’s time to dust off our Biology 101 textbooks, to remind us that
10 plants eat carbon dioxide, converting it to oxygen in a process known as
11 photosynthesis. Probably, deforestation of the Amazon rain forest over a
12 75-year period has had something to do with an increase in atmospheric
13 carbon dioxide. Stranger things have happened.

14 With that in mind, just about any 7th grade Biology student will tell you that
15 if you want to lower carbon dioxide, everybody should simply plant three
16 native trees and shrubs every year for about 5 years.

17 [https://www.omicsonline.org/open-access/the-essential-role-of-](https://www.omicsonline.org/open-access/the-essential-role-of-photosynthesis-in-defining-net-zero-carbon-dioxide-emissions-for-equilibrium-calculations.pdf)
18 [photosynthesis-in-defining-net-zero-carbon-dioxide-emissions-for-](https://www.omicsonline.org/open-access/the-essential-role-of-photosynthesis-in-defining-net-zero-carbon-dioxide-emissions-for-equilibrium-calculations.pdf)
19 [equilibrium-calculations.pdf](https://www.omicsonline.org/open-access/the-essential-role-of-photosynthesis-in-defining-net-zero-carbon-dioxide-emissions-for-equilibrium-calculations.pdf)

20 Plaintiff is well-qualified to represent this case before this Court. Plaintiff
21 delivers regular plenary addresses at Climate Change Conferences like
22 the one in Dubai ahead of the fake COP28 in 2023.



1

2 This manuscript is the only worldwide manuscript defining the term

3 Netzeroco2e. When a company states that we will be at NetZero by 2030

4 or 2050 they are speaking about a fictitious variable. In court, Plaintiff will

5 present and prove this like he did to the Hillsboro Rotary.

6 Worldwide we only have 8.6 gt (billion tons) of photosynthesis left in the

7

8 world. Carbon dioxide is a 97% reduction in photosynthesis. This

9 manuscript has over 30 well-documented external references. It took over

10 three years of research and a team of scientists to write and publish this

11 well documented report. It has been presented as a plenary address at

1

2 13 climate change conferences worldwide to date, with a waiting list of

3

4 speaking invitations.

5 **Executive Summary**

6

7 Portland General Electric and other entities raise rates because they

8

9 believe the junk science of the UN Intergovernmental Panel on Climate

10

11 Change (IPCC) reports, which are deliberate science fiction.

12

13 Plaintiff leads a team of 35 doctoral level university professors. This official

14

15 watchdog team contributes to the “Expert and Government” review of the

16

17 IPCC reports, exposing a constant stream of erroneous and misleading

18

19 junk science. We have also published a college and high school textbook

20

21 based on these findings.

22

23

Climate Crisis Changed

24

The Intergovernmental Panel On Climate Change

Cctruth.org

Reports are Deliberate Science fiction
(IPCC).

College Textbook

End of Executive Summary

COMPLAINT

Defendants have deceived state regulators and the public, requesting rates hikes on the assumption that “green,” unreliable energy is the answer. On the contrary, “Green” is planting more native trees and shrubs.

The table below, along with other critical information, was presented by a grid expert at an October 18, 2023 Cascade Policy Institute Conference.

Note that for this Winter, 2024-2025 the Northwest electric grid is projected to fall 927 megawatts short of demand. It is projected to be almost nine times as bad in 10 years.

In the face of these dramatic shortfalls, Defendants stand silently by while 4 dams are removed in the Klamath River Basin, and others elsewhere.

1 Production from these 4 dams alone, were a source of clean, hydro power
2
3 that would have made up 20% of the shortfall for the coming year.
4

5 Incompetent mitigation has created an EPA Superfund cleanup of
6 unprecedented expense on the banks of the Klamath River.
7

8 The grid expert said they are talking about activating virtual generators at
9
10 homes to help make up the difference when needed. For example, a virtual
11 generator is equipped to switch the smart meter on a home which is
12 charging an electrical vehicle at night and drain the Ev battery charge back
13
14 into the grid. This of course, will leave thousands of motorists stranded at
15
16 home on a daily basis.
17

Northwest Region Requirements and Resources

Table 1. Northwest Region Requirements and Resources – Annual Energy shows the sum of the individual utilities' requirements and firm resources for each of the next 10 years. Expected firm load and exports make up the total firm regional requirements.

Average Megawatts	2023-24	2024-25	2025-26	2026-27	2027-28	2028-29	2029-30	2030-31	2031-32	2032-33
Firm Requirements										
Load ¹⁾	21,814	22,791	23,694	24,558	25,545	26,225	26,485	26,681	26,841	27,006
Exports	520	502	502	501	501	501	501	501	501	501
Total	22,334	23,293	24,195	25,060	26,046	26,726	26,986	27,182	27,342	27,507
Firm Resources										
Hydro ²⁾	11,459	11,439	11,424	11,462	11,424	11,402	11,200	11,200	11,161	11,005
Small Thermal/Misc.	28	28	28	28	28	18	11	11	11	11
Natural Gas ³⁾	4,107	4,497	4,801	4,551	4,546	4,544	4,474	4,426	4,225	4,222
Renewables-Other	276	275	273	274	269	268	268	266	264	260
Solar	503	503	503	502	502	501	501	500	498	483
Wind	1,757	1,747	1,747	1,721	1,661	1,623	1,611	1,596	1,596	1,622
Cogeneration	41	41	34	32	31	31	31	31	31	31
Imports	488	488	467	467	453	380	324	310	310	222
Nuclear	1,116	994	1,116	994	1,116	994	1,116	994	1,116	994
Coal	2,583	2,356	1,593	1,065	1,068	891	593	479	497	508
Total	22,357	22,366	21,985	21,096	21,097	20,652	20,127	19,810	19,708	19,357
Surplus (Deficit)	22	(927)	(2,210)	(3,963)	(4,949)	(6,074)	(6,859)	(7,372)	(7,634)	(8,150)

¹⁾ Load net of energy efficiency

²⁾ Firm hydro for energy is the generation expected assuming critical (8%) water condition (the methodology is changed for the 2023 report)

³⁾ More energy may be available from natural gas power plants

18
19
20 Plaintiff earlier mentioned residence time of atmospheric carbon
21

1 dioxide. Residence time for atmospheric Carbon Dioxide may be
 2 compared to standing water in a kitchen sink with the drain plugged. The
 3 water resides for a long period of time.

4
 5 “Retention time” conveys the same idea as “residence time.” The
 6 average residence time is the average time a molecule of

7
 8 carbon dioxide, for example, remains suspended in the troposphere,
 9 according to

10
 11 more than 160 PhD’s in 19 published manuscripts, summarized in one
 12 published manuscript.

13
 14 Therefore, anything we have done or will do with

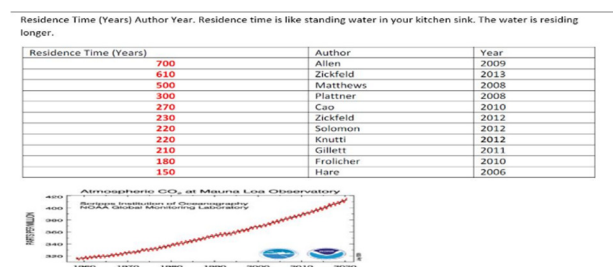
15
 16 emissions of carbon dioxide will take 150 years to have any effect.

17
 18 Proof lies in a review of major events, which should have lowered
 19 atmospheric carbon dioxide worldwide, for which there is still no effect in
 20 the carbon dioxide rise data.

- 21
 22
- 23 ➤ With the oil embargo in the 1970’s, lasting for almost two years, the
 - 24 worldwide carbon dioxide emissions should have dropped by 90%.
 - 25 ➤ With multiple recessions, each one should have reduced the
 - 26 worldwide carbon dioxide emissions by 40% for at least one year.
 - 27 ➤ The worldwide recession in 2009 should have resulted in a 70%
 - 28 reduction in emissions of carbon dioxide for almost two years.
 - 29 ➤ The COVID-19 pandemic should have created a 6% reduction in
 - 30 emissions for 1.5 years.



32 But, you can clearly see no signature from these events in the NOAA data.



1 Unrealized Global Temperature Increase: Implications of Current
2 Uncertainties, Schwartz, S. E. J. Geophys. Res. , 2018, doi:
3 10.1002/2017JD028121.
4
5
6
7

8 **Conclusion**

9

10 There is no need for Portland General to raise electric rates at all. They
11 must stop making foolish investments in solar panels, batteries, and EV
12 charging stations. These have no effect on climate change.
13

14 Plaintiff and class action members are already burdened by 24% “Biden
15 Inflation” for food and fuel. The 18% electric rate is not needed and hurts
16 especially the poor and those on fixed incomes.
17

18 **Relief Sought**

19

- 20 1. **Stop defendants from raising rates with the attached injunction.**
 - 21 2. **Order defendants to roll back prices to before the 18% increase.**
 - 22 3. **Freeze defendants from raising rates for 10 years.**
- 23

24 4. **Prayer for relief.**

25 5.

26 6. **1. Rulings requested.**

27
28

29 1. Plaintiff moves the honorable federal Judge to a ruling that

30
31 Defendants must stop raising rates for 10 years.

32 2. Plaintiff moves the honorable federal Judge to a ruling that

33
34 Defendants must roll back prices to the pre-18% increase.

35
36 3. Plaintiff moves the honorable federal Judge to a

37
38 ruling that Defendants, the licensee, must pay \$10 million to plaintiff

1
2
3
4
5
6
7
8
9

and class action members, with \$9 million to be shared with the class action members.

David C. White Pro Se. 7/25/2024

In the United States Court of Federal Claims

Case No.
Judge

Plaintiff(s),

v.

Defendant 1.

Dave Coffman, as geoscientist
Resource Environmental Solutions,
Corporate Headquarters – Houston
6575 West Loop South, Suite 300
Bellaire, TX 77401
713.520.5400 x6134

Defendant 2.

Mark Bransom in his capacity as Chief Executive Officer of Klamath River Dam Renewal Corp.
info@klamathrenewal.org

Defendant 3

Klamath River Renewal Corporation
2001 Addison Street, Suite 317
Berkeley, CA 94704
Phone: 510-560-5079

Defendants.

CERTIFICATE OF SERVICE

I hereby certify that on 5/3/2024 a copy of complaint, was mailed via us mail to defendants by Federal Marshals.



David White
18965 NW Illahe St
Portland, Oregon,
503-608-7611



- 1
- 2
- 3
- 4
- 5