

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UG 266

In the Matter of

NORTHWEST NATURAL GAS
COMPANY, dba NW NATURAL

Investigation into Schedule H, Large
Volume Non-Residential High Pressure
Gas Service Rider.

PETITION TO INTERVENE

Clean Energy Fuels Corp. petitions to intervene in this proceeding. In support of this petition, the following is provided:

1. The contact information (name, address, email address) of the petitioner is:

Name: Todd Campbell
Company: Clean Energy Fuels Corp.
Street Address: 4675 MacArthur Court, Suite 800
City, State, Zip: Newport Beach, CA 92660
Email Address: tcampbell@cleanenergyfuels.com
Telephone: 949.437.1183

Please include this contact on the service list.

2a. The petitioner will will not be represented by counsel in this proceeding. The contact information for petitioner's counsel to be included on the service list is:

Name: Evelyn Kahl
Company: Alcantar & Kahl
Street Address: 33 New Montgomery St., Suite 1850
City, State, Zip: San Francisco, CA 94105
Email Address: ek@a-klaw.com
Telephone: 415-421-4143

2b. Additional contacts to be included on the service list (a petitioner is limited to three contacts on the service list):

Name: Katy Rosenberg
Company: Alcantar & Kahl

Street Address: 33 New Montgomery St., Suite 1850
City, State, Zip: San Francisco, CA 94105
Email Address: klr@a-klaw.com
Telephone: 415-421-4143

Name:
Company:
Street Address:
City, State, Zip:
Email Address:
Telephone:

3. If the petitioner is an organization, the number of members in and the purposes of the organization:

List of Members attached

4. The nature and extent of the Petitioner's interest in the proceeding is:

Clean Energy is a provider of natural gas vehicle (NGV) refueling infrastructure and services across the country and has an interest in developing the Oregon market for private and government NGV fleets. A more detailed description of the scope of Clean Energy's services can be found at <http://www.cleanenergyfuels.com>. Northwest Natural Gas's entry into the NGV refueling infrastructure market, if permitted, would have a material effect on the ability of non-utility service providers to effectively engage in the market. Clean Energy is thus concerned about the scope of utility participation in the market and the terms and conditions of any participation, which will be addressed in this docket.

5. The issues the Petitioner intends to raise at the proceeding are:

1. The impact of utility participation in a competitive market, including the unique advantages a utility will have in the NGV refueling infrastructure market stemming from its position as a monopoly local distribution company (LDC).
2. The risk presented by the proposed program of cross subsidies between monopoly LDC ratepayers and customers in the competitive NGV refueling infrastructure market.
3. The benefits for the State of Oregon of competition in the NGV market.
4. Other related matters.

6. The special knowledge or expertise of the Petitioner that would assist the Commission in resolving the issues in the proceeding is:

Clean Energy offers NGV refueling infrastructure and services in California and other states and can offer its experience to inform the Commission's decision in this docket.

7. 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 860-001-0300.

 /s/ Evelyn Kahl
Petitioner or Petitioner's Representative

November 1, 2013
Date Signed

CERTIFICATE OF SERVICE

I hereby certify that I served a true and correct copy of the foregoing document in Docket UG 266 on the following named person(s) on the date indicated below by email addressed to said person(s) at his or her last known address(es) listed below.

STEPHANIE S ANDRUS -- CONFIDENTIAL
PUC STAFF--DEPARTMENT OF JUSTICE
BUSINESS ACTIVITIES SECTION
1162 COURT ST NE
SALEM OR 97301-4096

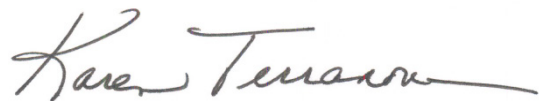
ERIK COLVILLE -- CONFIDENTIAL
PUBLIC UTILITY COMMISSION OF OREGON
PO BOX 1088
SALEM OR 97308-1088

JENNIFER GROSS
NORTHWEST NATURAL
220 NW 2ND AVENUE
PORTLAND OR 97209

KELLEY MILLER
NORTHWEST NATURAL
220 NW 2ND AVE
PORTLAND OR 97209

LISA F RACKNER
MCDOWELL RACKNER & GIBSON PC
419 SW 11TH AVE., SUITE 400
PORTLAND OR 97205

Dated November 1, 2013 at San Francisco, California.



Karen Terranova
Alcantar & Kahl
33 New Montgomery St, Suite 1850
San Francisco, CA 94105
415-403-5542
kt@a-klaw.com