

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

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

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: Michael Tucker  
Company: TruStar Energy, LLC.  
Street Address: 7970 Cherry Ave #301  
City, State, Zip: Fontana, CA 92336  
Email Address: mtucker@trustarenergy.com  
Telephone: 909 793 3700

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

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

Name:  
Company:  
Street Address:

City, State, Zip:  
Email Address:  
Telephone:

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:

TruStar 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 TruStar Energy's services can be found at <http://www.trustarenergy.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. TruStar 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:

TruStar 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.

Mike Tucker



Petitioner or Petitioner's Representative

November 4, 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.

OPUC DOCKETS  
CITIZENS' UTILITY BOARD OF OREGON #10  
SW BROADWAY, STE 400  
PORTLAND OR 97205

STEPHANIE SANDRUS – CONFIDENTIAL PUC  
STAFF-DEPARTMENT OF JUSTICE BUSINESS  
ACTIVITIES SECTION  
1162 COURT ST NE SALEM  
OR 97301-4098

TOMMY A BROOKS  
CABLE HUSTON BENEDICT HAAGENSEN & LLOYD 1001 SW  
FIFTH AVE, STE 2000  
PORTLAND OR 97204-1136

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

ROBERT JENKS – CONFIDENTIAL CITIZENS'  
UTILITY BOARD OF OREGON 610 SW  
BROADWAY, STE 400  
PORTLAND OR 97205

EVELYN KAHL – CONFIDENTIAL ALCANTAR  
& KAHL  
33 NEW MONTGOMERY ST, STE 1850 SAN  
FRANCISCO CA 94105

G. CATRIONA MCCracken – CONFIDENTIAL CITIZENS' UTILITY  
BOARD OF OREGON  
610 SW BROADWAY, STE 400  
PORTLAND OR 97205

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

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

KATY ROSENBERG – CONFIDENTIAL  
ALCANTAR & KAHL  
33 NEW MONTGOMERY ST, STE 1850 SAN  
FRANCISCO CA 94105

CHAD M STOKES  
CABLE HUSTON BENEDICT HAAGENSEN & LLOYD LLP 1001 SW  
5TH - STE 2000  
PORTLAND OR 97204-1136

Dated November 4, 2013

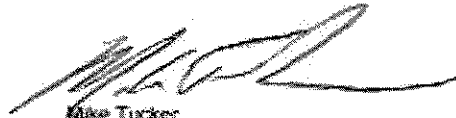


Mike Tucker  
TruStar Energy  
7970 Cherry Ave #301  
Fontana, CA 92335  
909 793 3700  
mtucker@trustarenergy.com

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.

Dated November 4, 2013



Mike Tucker  
TruStar Energy  
7970 Cherry Ave #301  
Fontana, CA, 92336  
909 793 3700  
mtucker@trustarenergy.com

OPUC DOCKETS  
CITIZENS' UTILITY BOARD OF OREGON 610  
SW BROADWAY, STE 400  
PORTLAND OR 97205  
[dockets@oregoncub.org](mailto:dockets@oregoncub.org)

STEPHANIE SANDRUS – CONFIDENTIAL PUC  
STAFF—DEPARTMENT OF JUSTICE BUSINESS  
ACTIVITIES SECTION  
1182 COURT ST NE SALEM  
OR 97301-4096  
[stephanie.andrus@state.or.us](mailto:stephanie.andrus@state.or.us)

TOMMY A BROOKS  
CABLE HUSTON BENEDICT HAAGENSEN & LLOYD 1001 SW  
FIFTH AVE, STE 2000  
PORTLAND OR 97204-1136  
[tbrooks@cablehuston.com](mailto:tbrooks@cablehuston.com)

ERIK COLVILLE – CONFIDENTIAL  
PUBLIC UTILITY COMMISSION OF OREGON PO BOX  
1088  
SALEM OR 97308-1088  
[erik.colville@state.or.us](mailto:erik.colville@state.or.us)

JENNIFER GROSS  
NORTHWEST NATURAL 220  
NW2ND AVENUE  
PORTLAND OR 97209  
[jennifer.gross@nwnatural.com](mailto:jennifer.gross@nwnatural.com)

ROBERT JENKS – CONFIDENTIAL CITIZENS'  
UTILITY BOARD OF OREGON 610 SW  
BROADWAY, STE 400  
PORTLAND OR 97205  
[bob@oregoncub](mailto:bob@oregoncub)

EVELYN KAHL – CONFIDENTIAL ALCANTAR  
& KAHL  
33 NEW MONTGOMERY ST, STE 1850 SAN  
FRANCISCO CA 94105  
[ek@a-klaw.com](mailto:ek@a-klaw.com)

G CATRIONA MCCRACKEN – CONFIDENTIAL CITIZENS' UTILITY  
BOARD OF OREGON  
610 SW BROADWAY, STE 400  
PORTLAND OR 97205  
[catriona@oregoncub.org](mailto:catriona@oregoncub.org)

KELLEY MILLER  
NORTHWEST NATURAL 220  
NW2ND AVE PORTLAND OR  
97209  
[kelly.miller@nwnatural.com](mailto:kelly.miller@nwnatural.com)

LISA FRACKNER  
MCDOWELL FRACKNER & GIBSON PC 419 SW  
11TH AVE., SUITE 400  
PORTLAND OR 97205  
[dockets@mcd-law.com](mailto:dockets@mcd-law.com)

KATY ROSENBERG – CONFIDENTIAL  
ALCANTAR & KAHL  
33 NEW MONTGOMERY ST, STE 1850 SAN  
FRANCISCO CA 94105  
[klr@a-klaw.com](mailto:klr@a-klaw.com)

CHAD M STOKES  
CABLE HUSTON BENEDICT HAAGENSEN & LLOYD LLP 1001 SW  
5TH - STE 2000  
PORTLAND OR 97204-1136  
[cstokes@cablehuston.com](mailto:cstokes@cablehuston.com)