

I write to the Commission on behalf of the natural gas fueled vehicle "driving community." I have recently relocated to Oregon to spend personal time promoting the construction and improved access to CNG fueling facilities for motorists living here and those traveling through the state. I presently drive a CNG fueled Honda Civic 50K miles a year (yes, it gets monthly oil changes) which demonstrates an upper end of what general use these vehicles are capable of.

Access to fueling has blossomed over the last decade. The adjacent state of Washington has a dozen or so CNG stations in the Puget Sound - many offering fuel to the public. And California leads the nation in both the number of CNG stations and CNG vehicles - largely due to its efforts to meet air basin pollution guidelines with its transit and refuse fleets.

When I lived in California, a CNG Honda I drove which was 8 years old at the time and had over 200,000 miles on it, was measured at a smog check station to have 1 HC and 0 NOx for exhaust constituents that have maximum limits of 85 and 300, as I recall. I like to say that the single hydrocarbon was likely a result of contamination on the probe from the previous vehicle!

So, among the alternative fuels, we are looking at a choice which uses standard fuel injection, spark-ignited engine technology, enjoys a range of better than 200 miles in standard vehicles, and is a fuel that is abundant in North America. So abundant, in fact, that it wasn't too many years ago that methane was being "flared off" by simply burning it out of the end of a pipe at oil fields and land fills.

Herein lies the dilemma. Though natural gas is delivered to fuel stations by existing pipeline networks (avoiding the need for tanker trucks), the fuel needs to be compressed to extremely high pressures, similar to that found in scuba tanks. A fleet may be fueled from hose hookups over night in a yard where they park using a compressor of moderate cost. But fast-fill stations require expensive machinery and expensive storage tanks - typically upwards of \$750,000. Fortunately, for Oregon, a number of new CNG stations are now offering or are about to offer public access in the Willamette Valley (Salem, Eugene, Lebanon) for a tenth of this cost as a result of re-purposing unused station equipment that was provided by the State Motorpool and Rogue Valley Transit. As in March of 2013, the last fuel gap on Interstate 5 was eliminated through these developments.

Jackson County has had a number of public CNG fueling facilities for over a decade. What has held Oregon back is a lack of access to dozens of CNG fueling facilities in the Portland area. Following the removal of a CNG dispenser in Hillsboro in 2009 due to low demand, motorists were making phone calls to the Wilsonville SMART and Salem SAMTD transit operations to ask for fueling help for personal cars traveling through the state - to no avail. From the early years to the present, other states have offered access to CNG fueling from regulated utility yards, transit yards, disposal facilities and airports. And there's nothing in this NW Natural request to the Commission that would improve such access in Oregon.

Perhaps this is a good place in my comments to put forward the point I wish the Commission to consider. Fuel stations for fleet users can be penciled out to be profitable when natural gas from the utility runs less than a dollar per gallon for fuel going into the truck. There is a demolition contractor in Santa Barbara that went to the expense of building a large CNG fueling facility mere blocks from an existing SoCal Edison public access station in order to fuel some 30 refuse trucks.

But what is encouraging is to have NW Natural offer its expertise to independent fleets for their transition to clean, affordable fuel. I state it this way so as to place emphasis on the public benefit of this initiative. I'm no business manager, but it may even contribute to an improved balance sheet for NW Natural if it were to sell more gas as a result. I'd like to see any of these private firms, such as NW Natural, undertake putting in more CNG fueling facilities because more public access is made possible.

In closing, I'd like to suggest an approach to arriving at an Order from the Commission and to provide a first-hand example of why CNG station installers cannot be bothered with solely the public access portion of a CNG fleet station.

First, Order 12-013 issued Jan 19, 2012, Investigation of matters relating to Electric Vehicle Charging, made provisions for regulated electric utilities in the state to provide transportation fuel to the public. This Order can provide a outline for the CNG Order:

<http://apps.puc.state.or.us/orders/2012ords/12-013.pdf>

In particular, it "Urge(d) staff to consider factors such as: (a) whether the proposed location is on an important travel corridor that requires adequate charging: (b) the proposed location

would fill a gap on a corridor that could not be adequately served by private charging stations; and (c) utility service at the proposed location would enable private charging stations to competitively serve other locations on the corridor."

Additionally, items from a recent Columbia Willamette Clean Cities Coalition paper, pages 30-32, provide examples of how gas utilities in the states of New Jersey, Oklahoma, Utah, Georgia, and California have helped to expand access to public CNG fueling:

<http://cwcleancities.org/docs/OR%20NG%20Trans%20Fuel.pdf>

Second, Gregg Thompson, Maintenance Manager at SAMTD in Salem, commented that he had been having discussions with Clean Energy Fuels about partnering with SAMTD to provide public access but that they had not deemed it profitable enough. This is easily seen in the case where I was fueling my car at the Salem Motorpool alongside a Freightliner CNG tractor one afternoon. My fill was 2 gallons. The truck took on 68 gallons. Providing access to CNG is easier when fleets that have put in stations because of fixed contracts - cabs, AT&T vans, refuse trucks - choose to make fuel available to the public.

I urge the Commission to support having regulated utilities in the state add High Pressure Gas Service Schedule H (CNG) to their product offerings.

/s/

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