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September 30, 2013

Public Utility Commission of Oregon
3930 Fairview Industrial Dr SE
Salem, Oregon 97203-1166

Dear Public Utility Commission Staff,

I am writing in support of Advice No. 13-10, a planned voluntary tariff filing by Northwest Natural intending to supply Compressed Natural Gas (CNG) to fleets.

The Northwest Gas Association (NWGA) is a trade organization of the natural gas industry in the Pacific Northwest. It seeks to advance the safe, dependable and responsible use of natural gas as integral to the region's environmental, energy and economic future. The NWGA's members include all six natural gas utilities serving Idaho, Oregon, Washington and British Columbia, and four transmission pipelines that transport natural gas from production areas to and through the region.

Nationally, CNG success stories have occurred in states where utilities have been allowed to participate in providing fueling. Questar Natural Gas and Southern California Gas Company have seen adoption rates grow thanks to their efforts in Utah and the Los Angeles area, respectively. In British Columbia FortisBC has been a leader in fostering CNG adoption, in part due to their ability to provide fueling opportunities along with other incentives for natural gas transportation.

A regulated option for CNG fueling will provide customers in NW Natural's service territory with the confidence to invest in new vehicles and the knowledge that they will enjoy safe and reliable CNG service for the life of their fleet. Utility involvement also provides the transparency and PUC oversight enjoyed by traditional natural gas consumers.

Transitioning to CNG as a vehicle fuel represents an important step in Oregon's efforts to reduce greenhouse gas emissions. When compared with gasoline or diesel CNG produces 20 to 30 percent less CO₂ upon combustion and significant reductions in particulate matter, sulfur oxides and nitrogen oxides.

In addition to the environmental benefits, CNG is an affordable fueling option, historically enjoying a 30 to 50 percent price advantage when compared with gasoline and diesel while employing readily available engine technology.

Please don't hesitate to contact me if I may be of additional assistance during this process at dkirschner@nwga.org or 503-344-6637.

Sincerely,

A handwritten signature in black ink, appearing to read "Dan S. Kirschner", written over a horizontal line.

Dan S. Kirschner, Executive Director