



October 10, 2013

Mr. Steven King, Executive Director  
Washington Utilities and Transportation Commission  
1300 S. Evergreen Park Dr. SW  
Olympia, WA 98504-7250

RE: Docket UG-131589

Dear Mr. King:

I am writing to express my hope that the compressed natural gas service proposed by Puget Sound Energy is approved to help advance the use of alternative fuels for fleet vehicles operating in Washington state.

As a fleet owner and fuel distributor, Associated Petroleum Products, Inc. is not only considering using natural gas as a fuel for its fleet but also considering selling compressed natural gas to its retail fuel customers. In addition to owning a sizeable fleet of fuel delivery trucks that could be converted to compressed natural gas given favorable economics, Associated owns and operates a network of unmanned fueling stations across western Washington. It is Associated's desire to partner with firms having the ability to assist Associated in delivering natural gas to its customers operating natural gas equipment. Low cost and clean-burning compared to diesel or gasoline, natural gas as a fuel for fleets could offer Associated and its customers favorable economic and environmental advantages.

One of the challenges Associated faces in making a change to natural gas for fleet and customer use is refueling infrastructure. Currently there are only a few publicly available fueling stations. The capital investment for refueling equipment is significant.

PSE's proposed service would provide us another option for fleet and customer fueling that would help us spread the capital costs of the required infrastructure over time.

Because PSE is a regulated utility, I am confident that the pricing for the proposed compressed natural gas service will be coordinated, open, and transparent, giving interested parties the motivation to make a significant investment in natural gas fleet vehicles.

As the private sector and local and state governments share the responsibility to operate alternative-fueled vehicles, we support the implementation of innovative mechanisms, like Puget Sound Energy's compressed natural gas proposal, to spur further development toward greater use of natural gas in the transportation sector.

I encourage you to approve Puget Sound Energy's proposed service.

Sincerely,

Frank D. Pupo, Jr.  
Exec. VP and COO

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GENERAL MANAGER  
REGULATORY SERVICES