



This letter is submitted in response to the Utah Public Service commission's request for public input regarding an investigative docket opened concerning the implementation of Utah Senate Bill 275.

Blu is a Salt Lake City based private company engaged in the business of developing, constructing and operating natural gas and alternative fuel fueling stations in Utah and across the United States. In the last 12 months BLU has invested over 12 million dollars in constructing high capacity Natural gas fueling stations across the state of Utah. Starting in Early 2012 with 4 employees we now employ over 100 employees at our newly acquired corporate headquarters just south of the Salt Lake International Airport. We currently operate 3 high capacity public natural gas stations in Salt Lake City as well as large high capacity stations in Beaver, Hurricane, and Myton. We are under construction on an additional station in Ogden, Utah and expect to open a station in Draper and Wendover late in 2013 or early in 2014.

Across the United States we plan to open over 50 public stations in 2013. As of today Utah has by far the most developed natural gas fueling infrastructure in the United States with the possible exception of the state of Oklahoma. Utah has over 42 publicly accessible natural gas fueling stations in virtually all areas of the state. These stations all well distributed and are heavily concentrated along the Wasatch front within the highest population areas and along the Interstate freeway system with an appropriate number of stations spread out among the less densely populated areas of the state (please refer to the attached map.)

In our opinion the main issue in the State of Utah currently is that we need more vehicles fueling at the public stations that already exist. We highly encourage the PSC and the Utah legislature to look at practical ways to continue to encourage and promote an acceleration in the growth of all types of natural gas vehicles in the state through SB275 and other measures.

We have several potentially serious concerns with SB 275. First, we are concerned that it will give Questar and inter-local entities an unfair competitive advantage in developing, financing and operating publically accessible natural gas fueling stations. We do not believe that government regulated monopolies or government controlled entities should be given unfair advantages over the private sector in providing alternative fuels to the public or any private entities. We also believe that private enterprise should be encouraged and given preference to build own and operate fueling facilities for government and other public entities.

Second, we are concerned that the goals and objectives of SB275 are not clearly defined. It is difficult to analyze the potential effectiveness of SB275 when the objectives are not clear.



We believe that Utah is a leader in job growth and economic vitality because we keep government small and incentivize entrepreneurship. We believe that it is a central and correct belief of most of the citizens of Utah that the private sector is better equipped than government and quasi government agencies to build, own and operate publically accessible fueling stations. If a need for a station exists within a public entity we believe that a fair and unbiased RFP should be issued and that the private business that is most responsive to the needs of the entity should be allowed to build and operate the non-public facility. Public facilities should be developed owned and operated by private sector entities.

We hope to work in good faith with all stakeholders to fairly incentivize the adoption and continued leadership and growth of natural gas fueled vehicles and stations in the state of Utah.

Sincerely,

Merritt Norton  
CEO  
BLU

**Utah's 42 Public Natural Gas Fueling Stations**

