

June 13, 2016

Mr. David Freed
Acting State Superintendent
New Jersey Weights and Measures
1261 Routes 1 & 9 South
Avenel, NJ 07001

RE: NCWM Publication 16 - Proposed DGE Standard for Natural Gas (Items 232-8, 237-1, and 337-2)

Dear Superintendent Freed:

On behalf of the natural gas distribution companies represented by the New Jersey Utilities Association (NJUA)¹, I write to urge you to support adoption of the proposed diesel gallon equivalent (DGE) standard for natural gas. NJUA is the statewide trade association for investor-owned utilities that provide essential water, wastewater, electric, natural gas and telecommunications services to New Jersey residents and businesses 24 hours a day, 7 days a week, 365 days a year. NJUA has provided a forum for the exchange of ideas and a unified voice in the public policy arena for its members since 1915.

As you know, the National Conference on Weights and Measures (NCWM) will hold its 2016 Annual Meeting this July in Denver, Colorado. At this meeting, members will vote to determine how natural gas used as a motor vehicle fuel is sold. According to NGV America, since the DGE proposal was first put forward by our industry, ten states have enacted legislation or approved regulations recognizing the DGE as a standard for dispensing natural gas and twenty seven states now use the standard for taxing LNG. Clearly, there is a lot support around the country for adopting the DGE as a national standard. Thus, we encourage your support of the proposed DGE standard currently before NCWM in Publication 16.

The DGE standard will benefit consumers and industry alike because it provides an efficient way to compare the value of CNG and LNG purchases with diesel fuel. Today, all retail CNG dispensing pumps used in the U.S. dispense CNG in GGE units and all retail stations display the price of CNG in GGE units. The change to a DGE was requested by the natural gas industry for two primary reasons: 1) there is no nationally recognized standard in place for selling liquefied natural gas; and 2) the DGE unit is more appropriate in the case of LNG and CNG that is sold for use in heavy-duty trucks since the natural gas will displace diesel fuel.

Again, we encourage you to support the adoption of DGE as a national standard, per Publication 16. Thank you for your consideration.

Sincerely,



Andrew Hendry, President

¹ Public Service Electric and Gas Company, South Jersey Gas Company, Pivotal Utility Holdings, Inc. d/b/a Elizabethtown Gas, and New Jersey Natural Gas
Aqua New Jersey, Inc. • Atlantic City Electric Company • Atlantic City Sewerage Company • Elizabethtown Gas • Gordon's Corner Water Company • Jersey Central Power & Light, A FirstEnergy Company • Middlesex Water Company • New Jersey American Water • New Jersey Natural Gas • Public Service Electric & Gas Company • Rockland Electric Company • Shorelands Water Company • South Jersey Gas • United Water • Verizon New Jersey

cc: Don Onwiler
Executive Director
National Conference of Weights and Measures
1135 M Street, Suite 110
Lincoln, Nebraska 68508
don.onwiler@ncwm.net

Jerry Buendel
Chairman
National Conference of Weights and Measures
Program Manager Dept. of Agriculture
Washington State
1111 Washington Street
Olympia, WA 98504-2560
jbuendel@agr.wa.gov

Richard Lewis
Chair
Laws and Regulations Committee
Georgia Department of Agriculture
19 MLK Drive, Room 321
Atlanta, Georgia 30334
E.richard.lewis@agr.georgia.gov

Mahesh Albuquerque
Chair
Specifications and Tolerances Committee
Director
Colorado Division of Oil and Public Safety
633 17th Street, Suite 500
Denver, CO 80202-3610
mahesh.albuquerque@state.co.us