



January 5, 2014

Fran Elson-Houston
Ohio Department of Agriculture
8995 East Main Street, Building 5
Reynoldsburg, OH 43068-3399

RE: NCWM 2015 Interim Meeting - Publication 15 and the Proposed DGE Standard for Natural Gas

Dear Director Elson-Houston:

I am writing to urge you to support the establishment of a national weights and measures standard for dispensing liquefied natural gas in diesel gallon equivalent units. As North America's largest provider of natural gas transportation fuel, we have perhaps the strongest grasp on what this growing marketplace requires. Our portfolio includes over 450 stations in 42 states and Canada. As a company we provide construction, operation and maintenance services for refueling stations and have over 17 years of experience in the industry.

The National Conference on Weights and Measures will hold its 2014 Interim Meeting in January. NCWM members once again are expected to address how natural gas used as a motor vehicle fuel should be sold. NCWM has considered this issue several times over the past several years. The latest such consideration came at the 2014 Annual Meeting held this past July in Detroit, Michigan. At that meeting, a natural gas industry supported proposal that had the support of many other trade associations and government officials, was voted on and received 29 votes in support and 9 against in the House of Representatives. Unfortunately, the votes in support of the measure in the House of Delegates were not sufficient to gain passage.

The natural gas industry continues to support the adoption of a diesel gallon equivalent (DGE) standard for liquefied natural gas sales. It has been twenty-years since the NCWM first adopted the gasoline gallon equivalent (GGE) standard for compressed natural gas (CNG). That standard has benefited consumers and industry alike because it provides consumers with a ready means of comparing the value of CNG purchases with gasoline. All retail CNG dispensing pumps used today in the U.S. dispense CNG in GGE units and all retail station display the price of CNG in GGE units.

The natural gas industry has requested that NCWM adopt a diesel gallon equivalent (DGE) for liquefied natural gas (LNG) that is sold to truckers and other users who typically use diesel fuel. The DGE standard has been proposed for two primary reasons:



1) there is no standard in place for selling liquefied natural gas; and 2) the DGE unit is more appropriate in the case of LNG because it is sold for use in heavy-duty trucks which operate solely on diesel fuel.

The adoption of the industry supported DGE proposal preserves the continued use of the gasoline gallon equivalent (GGE) standard, while also providing a standard for liquefied natural gas that is intended to displace diesel fuel. Recognizing the DGE as a legally acceptable method of sale would embrace the commercial practice already being used by industry and the statutory provisions adopted by a number of states. Proposals that would push to do away with the GGE standard and reject the DGE standard will not lead to a national standard or uniformity because too many states have already moved to recognize these units for natural gas sales. Therefore, adoption of the industry proposal provides the best opportunity for adoption of a truly uniform standard for selling natural gas as a diesel replacement.

For these reasons, **Clean Energy** supports the NCWM adoption of the proposed DGE standard for CNG and LNG, and urges you to do so as well.

Sincerely,

Brett Barry

Cc:

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