

From: CKlassanos@mcneilusco.com
NOTE: This email was addressed to multiple NCWM Members
Cc: [Don Onwiler](mailto:Don_Onwiler); ron.hayes@mda.mo.gov; tlloyd@mt.gov
Subject: Request for support
Date: Tuesday, July 14, 2015 8:53:01 AM

RE: NCWM Publication 16 - Proposed DGE Standard for Natural Gas (Items 232-4, 237-1, and 337-1)

I am writing on behalf of McNeilus Truck & Manufacturing. We design, manufacture and service compressed natural gas fuel systems for heavy duty and vocational vehicles with manufacturing facilities in Minnesota as well as 23 service centers throughout the United States supporting our customers.

This correspondence is to urge you to support the adoption of the proposed diesel gallon equivalent (DGE) standard for natural gas.

The National Conference on Weights and Measures (NCWM) will hold its 2015 Annual Meeting this July in Philadelphia, Pennsylvania. Members will vote to determine how natural gas used as a motor vehicle fuel is sold. Since the DGE proposal was first put forward, ten states have enacted legislation or approved regulations recognizing the DGE as a standard for dispensing natural gas, and a handful of state legislatures have introduced bills in 2015 to recognize the DGE standard. Thus, there is significant momentum toward adoption of this standard. For it to truly become a national standards, however, the proposed DGE standard currently before NCWM and referenced above needs to be approved.

The natural gas industry continues to support the adoption of a DGE standard for natural gas sales. Like the gasoline gallon equivalent (GGE) standard, which has been in place for more than twenty-years, 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 natural gas industry has requested that NCWM adopt a diesel gallon equivalent (DGE) for CNG and 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 nationally recognized standard in place for selling liquefied natural gas; and 2) the DGE unit is more appropriate in the case of CNG and LNG that is sold for use in heavy-duty trucks since the natural gas will displace diesel fuel.

The adoption of the DGE proposal that is contained in Publication 16 preserves the continued use of the GGE standard, while also providing a standard for 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. More than twenty states now recognize the DGE unit for LNG taxation.

Alternative approaches will not lead to a national standard or uniformity because so many states have already moved to recognize the gallon equivalent units for natural gas sales. Therefore, adoption of the proposals now before NCWM and contained in Publication 16 provide the best opportunity for adoption of a truly uniform standard for selling natural gas as a diesel replacement.

For these reasons, McNeilus Truck & Manufacturing supports the NCWM adoption of the proposed DGE standard for CNG and LNG, and urges you to do so as well.

Respectfully,

Chris Klassanos
McNeilus Truck & Manufacturing
Oshkosh Corporation

Cc:

Don Onwiler

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

Ronald Hayes, Chairman

National Conference of Weights and Measures
Missouri Department of Agriculture
P.O. Box 630
Jefferson City, Missouri 65102
ron.hayes@mda.mo.gov

Tim Lloyd

Chair
Laws and Regulations Committee
Montana Weights and Measures Bureau
P.O. Box 200516
Helena, Montana 59620-0516
tlloyd@mt.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

Although this e-mail and any attachments are believed to be free of any virus or other defect which might affect any computer system, it is the responsibility of the recipient to check that it is virus-free and the sender accepts no responsibility or

liability for any loss, injury, damage, cost or expense arising in any way from receipt or use thereof by the recipient.

The information contained in this electronic mail message is confidential information and intended only for the use of the individual or entity named above, and may be privileged. If the reader of this message is not the intended recipient, you are hereby notified that any dissemination, distribution or copying of this communication is strictly prohibited. If you have received this transmission in error, please contact the sender immediately, delete this material from your computer and destroy all related paper media. Please note that the documents transmitted are not intended to be binding until a hard copy has been manually signed by all parties.

Thank you.