



July 7, 2016

Mahesh Albuquerque

State of Colorado, Division of Oil and Public Safety
633 17th Street, Suite 500
Denver, CO 80202

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

I am writing to you on behalf of the Northern Colorado Clean Cities to indicate our support for the proposed diesel gallon equivalent (DGE) standard for natural gas. The Northern Colorado Clean Cities is part of a national coalition funded by the Department of Energy to reduce petroleum consumption in local communities and therefore improve national energy security, public well-being, and environmental health.

The National Conference on Weights and Measures (NCWM) will vote this summer to determine how natural gas is sold when offered by retailers as a motor vehicle fuel. We are writing to you in support of the DGE proposal because we believe that it support the goals of advancing the use of domestic alternative fuel by providing a unit of measurement that is easily understood by consumers and businesses. This standard will complement the gasoline gallon equivalent (GGE) standard that has been in effect for more than twenty years, and is necessary as natural gas increasingly is sold as a motor fuel for heavy-duty vehicles. The GGE and DGE are already widely in use in the U.S. and align with the units of measurement used for purposes of state and federal taxation and also with request to fuel economy regulations and labeling of trucks and vehicles.

We support the proposed DGE standard and retention of the GGE unit because these units make it easier for existing consumers and potential consumers to understand the value of natural gas as a transportation fuel including providing a basis for easy comparisons of the cost of purchasing natural gas. We do not think that it would be beneficial to require that retailers sell natural gas by the pound as this will only cause confusion for consumers and make it that much more difficult to educate

potential consumers about the benefits of using natural gas. It also likely will impose additional costs on retailers who will have to adjust their business practices, communication materials, and fuel dispensers. Some older dispenser may even have to be changed-out completely if alternative approaches are required. Imposing additional burdens on fuel retailers will not help advance the use of natural gas and is not consistent with the goals of increasing the use of domestic alternative fuels.

The Northern Colorado Clean Cities therefore supports proposed DGE proposal and urges you to support this proposal at this summer's NCWM meeting.

Sincerely,



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Cc:

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