



July 19, 2016

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

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

Dear Mr. Chairman:

I am writing to urge support of the diesel gallon equivalent (DGE) proposal pending before the National Conference of Weights and Measures (NCWM). Clean Energy is North America's largest provider of natural gas motor fuel for the transportation sector. We refuel over 40,000 vehicles a day and have been in the marketplace for nearly 20 years. During that timeframe the natural gas vehicle (NGV) market has grown exponentially. This growth all took place upon the gallon equivalent standard which was established by the NCWM several years before Clean Energy entered the business. Fuel contracts, most state taxes and federal taxes on natural gas motor fuel are all expressed in gallon equivalent units. Furthermore, an increasing number of states have already taken the lead and passed legislation and regulations making gallon equivalent units, including the DGE, the standard methods of sale for natural gas motor fuel transactions.

The current proposal before the NCWM simply asks for the current gallon equivalent approach, which consists of the gasoline gallon equivalent (GGE), to be expanded in order to accommodate the entry of natural gas motor fuels into the heavy-duty vehicle sector by formally establishing a DGE method of sale. Through labeling and receipt requirements the consumer, though already in favor of gallon equivalent approach, will see the number of pounds per unit multiple times during the transaction. NGV America has submitted commentary regarding the receipt requirements and how and why they need to be amended. We support their comments and encourage all members of the NCWM to read them but will not address the issue any further.



Clean Energy respectfully requests that the NCWM adopt DGE standards at their Annual July Conference in order to accommodate the clear wishes and current practices of both buyer and seller which have been reinforced by an out pouring of political support at all levels of government. Thank you for considering our request.

Sincerely,

A handwritten signature in black ink, appearing to read "Brett Barry", written over a light blue horizontal line.

Brett Barry
Senior Policy Advisor
Clean Energy