



Attn: Secretary Pritzker, Department of Commerce

From: Colorado Association of Commerce & Industry – Federal Affairs Council

Date: August 21, 2014

Re: Gallon equivalent standard for natural gas

The Colorado Association of Commerce & Industry (CACI)’s Federal Affairs Council hereby submits its formal request for Secretary Pritzker and the Department of Commerce to support a gallon equivalent standard for natural gas used for vehicles.

Statewide Chamber of Commerce: CACI is the voice of business and manufacturing in Colorado and our Federal Council was designed to bring awareness of state issues to the federal delegation, regulators and administration, and likewise raise awareness of federal issues for our business members. After discussing the impact of this issue, CACI’s Federal Council has taken a position in support of a gallon equivalent and requests your support in standardizing a “gallon equivalent” for natural gas used in motor vehicles.

CACI supports this standard for two major reasons: 1.) Colorado is one of the largest producers of natural gas in the country and this is an important asset for our state and regional economy; 2.) We believe a gallon equivalent is a consumer and a business issue, and allowing purchasers to more readily compare gallon equivalents will best serve the public and our markets moving forward. Despite the opposition’s belief that liquefied natural gas (LNG) is best distributed in kilograms, we urge you to listen to what businesses, energy providers and consumers have to say about using a gallon equivalent.

Background: In 1994, the *National Conference of Weights and Measures* (NCWM) approved the use of Gasoline Gallon Equivalents (GGEs) as the standard measure of sale for compressed natural gas (CNG) for use as motor vehicle fuel. In 2014, the NCWM Natural Gas Steering Committee proposed the continued use of this standard, and to similarly measure the sale of LNG in Diesel Gallon Equivalents (DGEs). At its July 2014 annual meeting, however, the NCWM failed to adopt this proposal. Due to this lack of progress, CACI requests the Commerce Department make a decision in support of this important matter.

Reasons for CACI’s Federal Council support of a gallon equivalent standard:

- Allows consumers to more easily and readily compare fuel types and cars for purchase,
- Ensures businesses can more easily track fuel costs for fleet vehicles,
- A common standard ensures transparency across the market for producers, sellers and consumers alike,

- Keeps CNG/LNG purchases fair and consistent, regardless of source of supply, and;
- This standard remains consistent with how natural gas is measured for “traditional” uses (therms vs. ft³)

Summary:

CACI appreciates the Department’s consideration of our business, energy provider and consumer perspective on the galloon equivalent issue. We look forward to working with the Department on moving this matter forward and if you should have any questions/concerns regarding this matter, please do not hesitate to contact Leah Curtsinger, CACI Federal Government Affairs Representative (LCurtsinger@cochamber.com or 303-866-9641).

Thank you.