

Colorado Association of Commerce & Industry
Federal Affairs Council

Dear Ms. Curtsinger:

Thank you for your inquiry to the Department of Commerce regarding the recognition of a “gallon equivalent” as a unit of measurement for use in the sale of natural gas as a retail motor fuel. As you may be aware this measurement issue was carried over for further debate within the National Conference on Weights and Measures (NCWM), an independent nonprofit association of state and local weights and measures officials, Federal agencies, manufacturers, retailers and consumers. The NCWM is the forum in which these interested parties work together to establish many U. S. legal metrology requirements.

As a non-regulatory agency of the Department of Commerce, the National Institute of Standards and Technology (NIST) is committed to promoting the development and adoption of technically well-defined, uniform, fair requirements for commercial weighing and measuring applications. NIST works with the NCWM to provide technical input that will encourage the development of legal metrology standards based on sound scientific principles; preserve the integrity of the U.S. measurement system; provide for fair competition among businesses; facilitate value comparison; and provide transparency for buyers and sellers. NIST is not a voting member of the NCWM, and does not oversee or direct the actions of the NCWM in any way.

As part of its technical contributions to the work of the NCWM Natural Gas Steering Committee, NIST has offered for the NCWM’s consideration, an alternative set of requirements that preserves the validity of the measurement made through existing metering technology while allowing the flexibility to use a gasoline gallon equivalent (GGE) and diesel gallon equivalent (DGE) as “supplemental comparison information.” This supplemental information would then be available to the customer or agencies needing to make pricing and additional comparisons with other fuels and energy sources.

During its 2015 cycle, the NCWM will have this and many other points of view to consider as it deliberates on this issue. While NIST will continue to provide technical information to assist the NCWM in its deliberations, ultimately, the decision whether to adopt any proposals under consideration rests with the NCWM. The standards adopted by the NCWM are voluntary until each State follows its own legislative process to adopt them as regulation.

We wholeheartedly join you in your support for the development of standards for compressed natural gas, liquefied natural gas, and other alternative fuels as safe, clean sources of energy in the U.S. If you have any questions, please contact me at NIST’s Office of Weights and Measures, Legal Metrology Devices Program, by telephone at 301-975-3989 or by email at juana.williams@nist.gov.

Sincerely,

Juana Williams
Legal Metrology Devices Program
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