

July 11, 2017

Mr. Brian J. Oakey  
Deputy Director  
Idaho State Department of Agriculture  
2270 Old Penitentiary Road  
PO Box 790  
Boise, Idaho 83701

**RE: Rules for Weights and Measures - Diesel and Gasoline Gallon Equivalents for Natural Gas;  
Negotiated Rulemaking Notice Dated June 8, 2017**

Dear Mr. Oakey:

NGVAmerica wishes to express its support for the proposed diesel gallon equivalent and gasoline gallon equivalent standards for natural gas. NGVAmerica submitted the petition requesting this action. NGVAmerica is a national trade association dedicated to creating a profitable, sustainable and growing market for compressed natural gas, liquefied natural gas, and renewable natural gas powered vehicles. NGVAmerica represents more than 200 companies, including vehicle manufacturers; natural gas vehicle component manufacturers; natural gas distribution, transmission, and production companies; natural gas development organizations; non-profit advocacy organizations; state and local government agencies; and fleet operators.

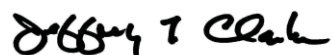
The Idaho Department of Agriculture by notice issued on June 8, 2017 has proposed adoption of the GGE and DGE standards for natural gas. The proposed definitions and standards are consistent with those adopted in 2016 by the National Conference on Weights and Measures and now recognized in NIST Handbooks 44 and 130 (2017 edition).

Adoption of these standards is supported by the natural gas industry and NGVAmerica members because it will facilitate the use of uniform standards across the country and provides a ready means for consumers to determine the value of the natural gas purchased for transportation purposes regardless of where they are purchasing natural gas. The GGE unit has been in place for more than 20 years benefiting both retailers and consumers. The DGE more recently has been embraced and supported by retailers and commercial users of natural gas as a standard for larger vehicles that mostly use diesel fuel. In the absence of any standards for how to sell LNG for the transportation market, the industry several years ago began selling LNG in DGE units but there was a lack of uniformity as to how to define the DGE for LNG. That issue was resolved in 2016 with the adoption of the DGE unit by the NCWM.

The GGE and DGE also are now recognized nationally for tax purposes by the U.S. Federal Government, the International Fuel Tax Agreement Association, and a growing majority of state taxation authorities. Recognizing these units as the legal method of sale will facilitate tax compliance by providing greater alignment between the units used for sale and the units used for taxation.

We urge the Idaho Department of Agriculture to finalize this action incorporating the GGE and DGE into its standards for natural gas.

Sincerely,

A handwritten signature in black ink that reads "Jeffrey T. Clark". The signature is written in a cursive, slightly slanted style.