

Idaho Natural Gas Vehicle Users Association P.O. Box 662, Boise, ID 83701 ngvidaho.org

July 21, 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

Dear Mr. Oakey,

The Idaho Natural Gas Vehicle Users Association (INGVUA) supports the proposed diesel gallon equivalent (DGE) and gasoline gallon equivalent (GGE) standards for natural gas. INGVUA is a non-profit dedicated to increasing the use of natural gas as a transportation fuel in Idaho through education, tax incentives, vehicle access, fuel access and technician training. Our members range from individual vehicle owners to large national fleet operators such as Republic Services and Matheson Trucking.

With the recent adoption of the DGE and GGE units as the legal method of sale for natural gas by the National Conference on Weights and Measures, it is appropriate for the State of Idaho to adopt the GGE and DGE as the legal method of sale. This will allow businesses such as Republic Services which operates two public natural gas fueling stations in Idaho to be consistent with other states in dispensing the standard, nationally recognized unit of fuel. Adoption of DGE and GGE units as the legal method by which to sell natural gas as a transportation fuel in the State of Idaho will also allow the State Tax Commission to appropriately tax natural gas when dispensed as a transportation fuel.

INGVUA representatives are available to support the Idaho Department of Agriculture in any efforts to finalize the proposed rule change and incorporate the GGE and DGE into the State standards for natural gas.

Respectfully,

Rachele D. Klein, INGVUA President rklein@republicservices.com 208-283-0624