

From: [Norvell Nelson](#)
To: [ARB LCFS Workshop](#)
Cc: [Matthew van Steenwyk](#); [Lyle Jensen](#); will@gqhlobby.com
Subject: Comment on the July 29th LCFS Workshop
Date: Thursday, August 04, 2016 8:58:01 AM

In slide 57 of the presentation workshop, CARB proposes to change the custody transfer unit for all natural gas fuels to "therms". I do not see the rationale here; such a change would represent a giant leap backwards in user transparency. In proposing this change, CARB wishes to define natural gas fuel units in terms that are convenient to the very few (the natural gas utilities), rather than in terms more familiar to the many (the users) such as GGE and GDE. The driver/users are used to thinking in miles per gallon or gallon equivalent, not in miles per "therm".

How does the change in natural gas units to "therms" prevent the so-called "conversion errors" alluded to in slide 57? More likely, the use of "therms" would confuse the fueling issue and could lead to more errors, either accidental or systematic.

Further, the current issue of "Fleets & Fuels" reports that "the National Conference on Weights and Measures has voted to the diesel gallon equivalent (DGE) as a legally authorized method of sale for natural gas that is sold as a motor fuel..." The text is as follows:

"Finally, Approves, the DGE
August 2, 2016 in [CNG](#), [LNG](#), [milestones](#), [NGVs](#) by [Rich Piellisch](#) | [No Comments](#)

***NGVAmerica Commends Weights & Measure Action
On Long-Sought Diesel Gallon Equivalent Recognition***

The National Conference on Weights and Measures has voted to approve the diesel gallon equivalent as a legally authorized method of sale for natural gas that is sold as motor fuel, ending a long-running effort by NGVAmerica and others to simplify the sale, especially of liquefied natural gas.



LNG station in California – photo courtesy NGVAmerica

“The DGE standard allows for the ready comparison of natural gas with diesel fuel,” the association says. It complements the GGE/gasoline gallon equivalent that has been in place for compressed natural gas since 1994 “and that has aided consumers and retailers alike.

“Importantly, the adoption of this standard fills a void for liquefied natural gas (LNG), which although sold by most retailers in DGE units, previously lacked a uniformly recognized standard,” states an NGVAmerica announcement.

‘A Long Road’

“A long road but glad we crossed the finish line to a DGE standard,” states a Clean Energy Fuels blog post.



NGVAmerica president
Matt Godlewski

"This successful vote was the culmination of years of hard work by NGVAmerica staff, our members, industry allies and public officials with the shared goal of transparency for the customer," said NGVAmerica president Matt Godlewski.

The DGE unit will also be available for CNG retailers who want to use the unit for their retail sales to truck fleets.

A Better Basis for Taxes Too

NGVAmerica noted that addition to providing "a common-sense unit of sale for fuel retailers and consumers, the DGE standard provides the benchmark for consistency with taxation methods and creates efficiencies associated with accounting and record keeping requirements.

"Twenty-eight states currently use the DGE for taxing LNG, and ten states have enacted legislation or approved regulations recognizing the DGE as a standard for dispensing natural gas."

The DGE is a known unit of measure familiar to the users of natural gas as a fuel, the consumption of which CARB wishes to promote for both GHG and criteria pollutant reductions. Why would CARB want to foist on these users an unfamiliar, not very transparent, energy unit? I urge CARB to abandon this poorly conceived proposed change.

Sincerely,
Norvell Nelson

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