

From: Douglas.Matthew@CDFA
To: [David Aguayo](#); [Greg Gholston](#)
Subject: LPG-23.1 comments
Date: Wednesday, August 2, 2023 2:47:29 PM

Good afternoon David & Greg,

Per your request, please share with others on NCWM S&T Committee.

LPG-23.1.

I would like to express that my comments are in reference to consistency within HB 44 and uniformity in enforcement. I would also like to extend appreciation to the S&T committee for hearing the comments in open hearings and editing the item based on those comments.

It is my understanding that the K15 connection referenced in the note as edited by the S&T committee is required on LPG vehicles beginning in 2020 and that it will be required on LPG RMFD beginning in 2024; through the NFPA. It is also my understanding that those devices which have already been installed will not need to replace their current connections to the K15 connection.

The note itself which can be found on the S&T Addendum Page S&T 11, specifies in part that "Devices used exclusively for Stationary Retail Motor-Fuel dispensing are those only utilizing a k15 connection..."

I believe that this note can be interpreted in two ways. The first would be that "Devices used exclusively as stationary RMFD" MUST have the K15 connection (requiring a connection replacement if not currently installed, this would be NR 2017 under S.2.5.2.)

The second interpretation being that those devices without the K15 connection are not contained within the parameters defined for "stationary devices used exclusively as RMFD" even if they are stationary devices which are used exclusively as RMFD. (Potentially exempting devices which should fall under the regulation - those stationary devices used exclusively as RMFD without K15 connections)

Based on this I feel that the item needs to be de-escalated to developmental to the address time gap due to Non-Retroactivity regarding new nozzle requirement and clarification as to how the note is intended to be interpreted.

Sincerely,

Matt Douglas

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