

Appendix B

U.S. National Work Group for the

Development of Commercial Hydrogen Measurement Standards

Fuel Specifications Subcommittee (FSS)

Proposed Method of Sale and Quality Specification

for Hydrogen Vehicle Fuel

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**U.S. National Work Group for the
Development of Commercial Hydrogen Measurement Standards**

**Fuel Specifications Subcommittee (FSS)
A Proposed Method of Sale and Quality Specification
for Hydrogen Vehicle Fuel**

Summary of Current Information

The Chairman of the FSS is: Mr. Robert W. Boyd, Linde North American, Inc.

- a. Initially, the proposed method of sale and quality specification for hydrogen vehicle fuel was presented at the Western (WWMA) and Southern (SWMA) Weights and Measures Association Annual Meetings in the fall of 2008. The proposal was adopted with a recommendation that it be submitted as an Informational item on the National Conference of Weights and Measures (NCWM) Laws and Regulations (L&R) agenda at the 2009 Interim Meeting, which was held January 11 - 14, 2009, in Daytona Beach, Florida. This item was also presented at the two remaining regions, the Central (CWMA) and Northeastern (NEWMA), Annual Conferences in the spring of 2009. The proposal was again presented at the 2009 NCWM Annual Conference, held July 12 - 16, 2009 in San Antonio, Texas.
- b. The recommendations of the FSS, based on the subcommittee's April 2009 review of the proposed method of sale for hydrogen engine fuel are:
 - i. The FSS agreed to use the current proposal as a foundation for the fuel quality standard for hydrogen. The FSS will continue to consider further refinement of the definitions for hydrogen vehicle fuel based on input from SAE International should they be deemed necessary to finalize the standard.
 - ii. The FSS noted that Federal Trade Commission's (FTC) Fuel Rating Rule (16 CFR Part 309), see the requirements in "Labeling of Alternative Fuels" (<http://www.ftc.gov/bcp/edu/pubs/business/autos/bus29.shtml>), requires dispensers to bear a declaration of minimum hydrogen content determined according to the test methods described in "Standard Test Method for Analysis of Natural Gas by Gas Chromatography (ASTM D1946-90)."
 - iii. The FSS further modified the proposed HB 130 language to recognize the language in 16 CFR Part 309.15 Posting of non-liquid alternative vehicle fuel rating.

Section I. Prologue

The discussion paper that follows is "The Starting Point: A Discussion Paper Describing a Proposed Method of Sale and Quality Specification for Hydrogen Vehicle Fuel" originally published in June 2008. The corresponding proposals are for the method of sale and fuel quality.

This paper describes proposals for a uniform method of sale and fuel quality specifications on hydrogen vehicle fuels that are under development by the USNWG Fuel Specifications Subcommittee (FSS). The

purpose of this document is to organize, focus, and record the work of the FSS. Participation in the work of the subcommittee is open to anyone intending to make a positive contribution to the process

The States have always had a leadership role in establishing and enforcing the laws and regulations for legal metrology and fuel quality in the United States. The goal of this effort is to develop proposals for inclusion in NIST Handbook 130, “Uniform Laws and Regulations in the areas of Legal Metrology and Engine Fuel Quality,”¹ which is a source for model laws that the States use in developing their legal requirements. Some states adopt the regulations in that handbook by reference or citation in law. This approach has provided national uniformity in regulation of a number of significant issues, including packaging and labeling, net quantity of contents, and fuel quality.

The FSS includes hydrogen producers, dispenser and component manufacturers, weights and measures, air resource, fuel quality officials, and other interested parties. This document is presented to invite comments from automotive and fuel cell manufacturers, marketers, weights and measures, and other state officials and other experts who certainly will have questions, concerns, and suggestions as these proposals are developed in the NCWM – L&R Committee.

The members of the FSS recognize that when small groups develop standards for emerging technologies it is impossible to be knowledgeable about all aspects of a subject which is, by its nature, changing even as a meeting takes place or a report of its progress is being composed. With this in mind, please review this document and contribute your knowledge, understanding, and ideas to this effort.

Section II. Method of Sale and Fuel Quality Standard

Participants at the first FSS meeting in March 2008, considered a proposal for a Method of Sale for Hydrogen Fuel that was prepared by NIST. Recent FSS work to update the proposed Method of Sale requirements are presented below. Also discussed was the need for a quality standard. The basis for that discussion was the proposed Hydrogen Fuel Standard developed by the California Department of Food and Agriculture; Division of Measurement Standards (CDFA/DMS) contained in a March 3, 2008, regulatory notice.² The FSS recognizes and commends the State of California for sharing its knowledge and experience in providing a starting point for a national standard for hydrogen fuel. This document should be interpreted as neither an endorsement, nor criticism, of the CDFA/DMS proposal by either the FSS or NIST unless otherwise stated. For the most recent FSS updates on the fuel quality proposal, refer to Section III.

Uniform Method of Sale for Hydrogen Vehicle Fuel

Defining a legal requirement for a uniform method of sale for commodities is the most practical and efficient way that weights and measures uses to ensure that consumers can make value comparisons between competing sellers of the same commodity. The purpose is to ensure that purchasing decisions enable consumers to obtain the greatest value for their money. A uniform method of sale also ensures that sellers advertise and deliver a commodity using a single unit of measurement so comparisons can be quick and simple. Typically commodities (e.g., gasoline, diesel fuel, food, milk, wine, sand and gravel, and others) are sold by weight, measure (volume or dimensions, including area), or count.

¹ See the 2009 Edition of NIST HB 130 at <http://www.nist.gov/owm>

² Available at <http://www.cdffa.ca.gov/dms/hydrogenfuel/hydrogenfuel.html>

Establishing a method of sale for any product is a critical first step in the development of a fair and competitive marketplace for any commodity, especially one that is just emerging and for which there is not a traditional method of sale for the commodity on which to build. History has shown that when products are introduced into the marketplace without a legally defined standard, confusion and unfair competitive practices can quickly evolve and potentially harm the consumer's perception of the product and business reputation of the seller.

The need for a method of sale was stated in the 2005 "Hydrogen Delivery Technology Roadmap,"³ which called on retailers and appropriate government agencies to establish a legal unit of measurement for hydrogen (see endnoteⁱ for further discussion).

The FSS recommends that all retail sales of hydrogen vehicle fuel be by mass using the kilogram as the unit of measurement.

The industry's pre-market practice has been to dispense hydrogen using the kilogram as the unit of measurement. The use of mass was strongly favored by the FSS participants who agreed that it should be the basis for retail commercial transactions. By requiring use of the kilogram as the unit of measurement for all retail dispensers, consumers can make value comparisons between competing retailers. Dispensing hydrogen by mass using the kilogram is specified in Section 2.4.2. Indications of OIML R 139 "Compressed Gaseous Fuel Measuring Systems for Vehicles" (Edition 2007) and is the method of sale used in other countries so the U.S. method of sale will be consistent with that used in the global marketplace. As this fuel becomes fully commercialized, consumers considering the lease or purchase of a hydrogen vehicle will need to learn the fueling process for their hydrogen vehicle and be educated that their fuel purchases will be made on the basis of mass using the kilogram. The FSS considered, but does not support, a gasoline gallon equivalent (GGE) units for use in retail commercial sales (see endnoteⁱⁱ).

This proposal presents the kilogram as the unit of measurement to be used in commercial sales. (See Figure 1 [pg 7] for an example of how the unit measurement may appear on the dispenser, and see Figure 2 [pg 7] on how the street signs will display the unit price). The unit can be shown using the term "kilogram" or by use of its accepted abbreviation "kg," which is its prescribed symbol in NIST Special Publication 330 – "The International System of Units (SI)."⁴

Nothing in the proposal should be interpreted as prohibiting the use of a hydrogen GGE for information purposes to facilitate general comparisons with other fuels in advertisements and other literature. Consumers who are considering the lease or purchase of a hydrogen vehicle should be informed that they will be purchasing fuel by the kilogram and that they can make reliable value comparisons using that method of sale.

The FSS recommends that in retail sales "HXX" be used to represent Hydrogen vehicle fuel and the capital "H" precede the "XX," which represents the service pressure of the hydrogen fuel offered for sale (expressed in the International System of Units (SI) unit megapascal [MPa]).

Product Identity

The FSS agreed to support the use of the capital letter "H" as the symbol for hydrogen instead of H₂ to simplify product identification of hydrogen vehicle fuel sold at the retail level.

³ Available at <http://www1.eere.energy.gov/vehiclesandfuels> on the Internet

⁴ See NIST Special Publication 330 – 2008 "The International System of Units (SI)." Ambler Thompson, Editor.

Service Pressures shall be shown in the SI Unit Pascal (MPa)

Knowing the service pressure of the dispenser is a critical factor for consumers as the storage tanks on their vehicle is designed to be filled at one of those pressures. In addition to needing this information for safety and vehicle filling purposes, participants at the March 2008 FSS meeting indicated that retailers may charge different prices depending on the delivery pressure at which the fuel is dispensed. Currently, some dispensers are marked with service pressures in units of bar⁵ (e.g., 350 bar and 700 bar) or megapascals (MPa), which are the pressures available to service hydrogen vehicles. A few dispenser manufacturers use megapascal (MPa) in trade publications and in declaring dispenser delivery pressures. The FSS agreed that the service pressure at which the product is dispensed must be posted on the user's interface of all dispensers.

While the bar is accepted for use with SI, the metric system, the primary SI unit for pressure is the pascal (international symbol – Pa). Typical values encountered for dispenser of service pressures in pascals, bar and pounds are 35 MPa (350 bar) (approximately equivalent to 5 000 psi) and 70 MPa (700 bar) (approximately equivalent to 10 000 psi). The FSS agreed that in using the SI unit for pressure, the pascal would standardize industry practice and enable it to easily present this information in a consistent manner. It will also simplify the manner used to declare service pressures on dispensers, street signs, and in advertisements.

Unit Pricing in Whole Cents

The FSS also agreed that the conditions for sale, when unit pricing is based on features, such as operation pressure, should be stated with the unit price in whole cents per kilogram on street signage to inform drivers of hydrogen vehicles of the service pressures available at the retailer's fueling facility. The proposal does not mandate street signs, but will require that when street signs are available they must display the unit price and service pressure of the dispensers. The requirement is only applicable when retailers voluntarily post or present the price of fuel in advertisements and on street signs.

The FSS agreed the traditional practice of using decimal fractions of a cent in unit pricing in advertisements, the unit price, or in the calculation of total price should not be extended to sales of hydrogen fuel. Under the proposed method of sale, that practice is prohibited (e.g., \$3.499 per kg would not be permitted but \$3.49 per kg would be permitted).

⁵ A bar is an atmospheric pressure defined as 100 kilopascals. See NIST Special Publication 330 – 2008 “The International System of Units (SI).” Ambler Thompson, Editor.

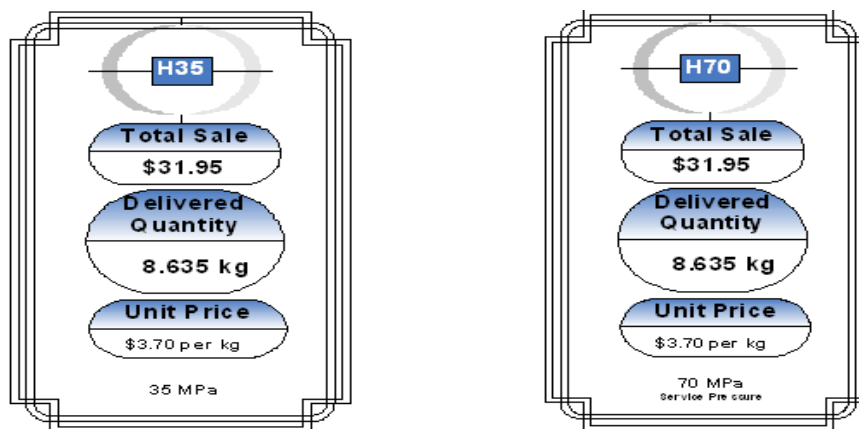


Figure 1. Examples of the product identity, measurement unit, unit price, and service pressure on the user's interface of a hydrogen Fuel Dispenser

A Competitive Marketplace

Figure 2 depicts how a fueling station in the marketplace might display required information. The purpose of the graphic is to illustrate that a uniform method of sale in a single unit of measurement and other requirements for posting of service delivery information will facilitate value comparison in a competitive marketplace and provide users with critical information. The graphics of the signage shows how posting the unit of measurement and service pressure provides drivers with information to permit them to make product and service pressure value comparisons between retailers.

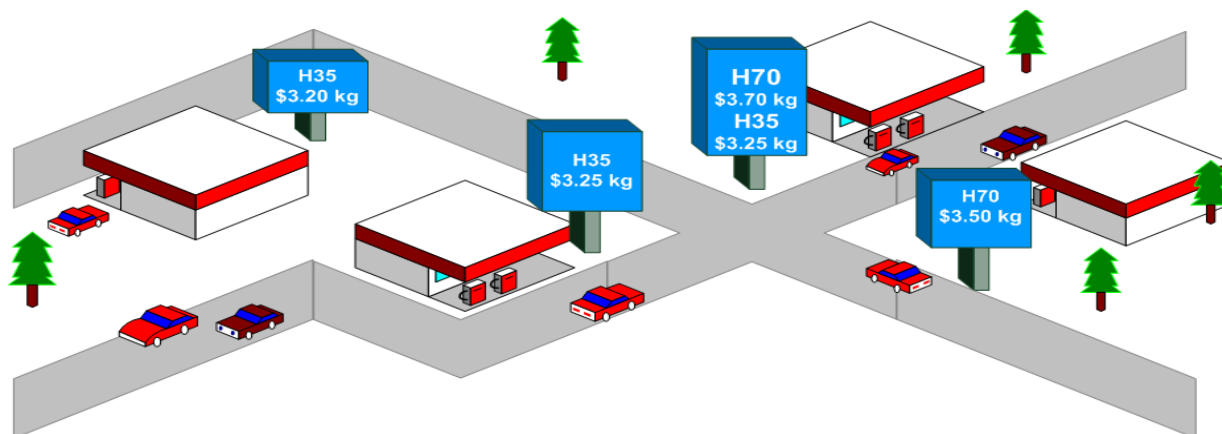


Figure 2. The use of the uniform unit of measurement and posting of product identity, and service pressure to enable value comparison.

One alternative to the posting of service pressures (perhaps even unit prices) may be found in the growing prevalence of vehicle navigation systems and satellite information services. If drivers of hydrogen vehicles have access to real-time price and service pressure information through those systems, and use them to make their purchasing decisions, the current approach of using street sign pricing may not continue in this marketplace.

The FSS supports the following method of sale for petroleum:

Recommendation: The FSS supports the proposal to be included in NIST Handbook 130: Section IV: Uniform Regulation for Method of Sale of Commodities. The FSS presented the following recommendation for consideration by the 2009 NCWM L&R Committee. This modified version includes a change to paragraph 2.XX.4.2 to include the units of megapascals.

Section 2. Non-food Products ^[Note 1, page 103]

2.XX. Retail Sales. – Hydrogen Fuel (H).

2.XX.1. Definitions – Hydrogen Fuel (H).

2.XX.1.1. Hydrogen Fuel. – A fuel composed of the chemical hydrogen intended for consumption in an internal combustion engine or fuel cell.

The symbol for hydrogen vehicle fuel shall be the capital letter "H" (the word Hydrogen may also be used.)

2.XX.2. Method of Retail Sale and Dispenser Labeling. – All hydrogen fuel kept, offered, or exposed for sale and sold at retail shall be in terms of the kilogram.

2.XX.3. Retail Dispenser Labeling.

2.XX.3.1. A computing dispenser must display the unit price in whole cents on the basis of price per kilogram.

2.XX.3.2. The service pressure(s) of the dispenser must be conspicuously shown on the user interface in bar or the SI Unit of Pascal (Pa) (e.g., MPa).

2.XX.3.3. The product identity must be shown in a conspicuous location on the dispenser.

2.XX.3.4. National Fire Protection Association (NFPA) labeling requirements also apply.

2.XX.3.5. Hydrogen shall be labeled in accordance with 16 CFR 309 – FTC Labeling Alternative Fuels.

2.XX.4. Street Sign Prices and Advertisements.

2.XX.4.1. The unit price must be in terms of price per kilogram in whole cents (e.g., "\$3.49 per kg" not \$3.499 per kg).

2.XX.4.2. The sign or advertisement must include the service pressure(s) (expressed in megapascals) at which the dispenser(s) delivers hydrogen fuel (e.g., H35 or H70).

Section III. Hydrogen Vehicle Fuel Quality Specification

The FSS will continue to develop a model regulation to specify the quality requirements for hydrogen vehicle fuel for addition to the Uniform Fuels and Lubricants Regulation (UFLR) in NIST Handbook 130. The UFLR cites ASTM International and SAE International standards for gasoline, diesel, and other fuels. At least 11 states use that model regulation as a basis for their rules on fuel quality. As with other fuels, the regulations in Handbook 130 will reference standards from appropriate standards organization and utilize the test methods authorized and referenced by those standards. The proposed regulation will likely include standards developed by ASTM International, SAE International, and the International Organization for Standardization (ISO), or other American National Standards Institute (ANSI) accredited organization.

The State of California is at the forefront in establishing a fuel quality standard for Hydrogen to meet a legislative mandate.⁶ At its first meeting in March 2008, the FSS participants reviewed the March 3, 2008 draft developed by the CDFA/DMS so that it could be used as a starting point in the development process for a national standard. This approach takes advantage of California's expertise, and the fact that it has been published for comment as part of that state's rulemaking process, meaning that it has received public review. The CDFA/DMS proposal provides an interim standard for hydrogen fuel.

Once ANSI has adopted fuel standard, the CDFA/DMS is required by law to adopt that standard by reference. Since test procedures have not yet been finalized to measure the properties specified in the CDFA/DMS interim standard, that agency will adopt sampling and test procedures in regulation as they are developed. The agency will begin enforcement of its regulations and require compliance once sample and test procedures have been adopted by an accredited organization and its regulation are finalized. Several FSS participants reminded the group that the higher the quality of the fuel the higher its cost may be, so the approach taken in the United States must be practical and cost effective if the commercialization of hydrogen vehicle fuel is to be successful.

Proposed Specification for Hydrogen Fuel

The FSS identified several quality criteria where there was tentative agreement with their associated values and the ability to test to those values with current technology available today (see properties 6, 7, 8, 9, 12, 14, and 16 which are highlighted in green) in the proposed Table 1. Hydrogen Fuel Quality Specification.

The FSS did not agree on all of the properties contained in the DMS proposal because there was either not enough research data or test methods available to support a decision (see properties 1, 2, 3, 4, 5, 10, 11, 13, and 15 which are highlighted in yellow) in Table 1 below. These and perhaps other properties will receive further consideration by the FSS and may be added to the quality standard in the future when such action is supported by research.

FSS supports the proposed new definitions to be included in NIST Handbook 130 Section IV. Uniform Regulations Part G. Uniform Engine Fuels, Petroleum Products, and Automotive Lubricants Regulations Section 2. Standard Fuel Specifications to address gaseous hydrogen refueling applications.

⁶ See <http://www.cdfa.ca.gov/dms/hydrogenfuel/hydrogenfuel.html> for more information on the California Division of Measurement Standards Hydrogen Fuel Program. (Viewed 4/11/08)

1. Specification for Hydrogen Fuel for Internal Combustion Engines and Fuel Cells

2. Definitions

1.XX. Fuel Cell. – an electrochemical energy conversion device in which fuel and an oxidant react to generate energy without consumption of its electrodes or electrolyte.

1.XX. Hydrogen Fuel. – a fuel composed of the chemical hydrogen intended for consumption in a surface vehicle with an internal combustion engine or fuel cell.

1.XX. Internal Combustion Engine. – a device used to generate power by converting chemical energy bound in the fuel into mechanical work to power a vehicle.

Cite the appropriate reference for the hydrogen fuel quality standard below that was developed by the California Division of Measurement Standards in NIST Handbook 130 Section IV. Uniform Regulations Part G. Uniform Engine Fuels, Petroleum Products, and Automotive Lubricants Regulations Section 2. Standard Fuel Specifications as follows:

Table 1. Hydrogen Fuel Quality Specification*						
Property		Value	Unit	Limit	Test Method(s)	Responsible Stds. Committee and Status of test method
1	Ammonia	0.1	ppm v/v	Maximum	to be specified	WK 10196 under ASTM D03.14
2	Carbon Dioxide	2.0	ppm v/v	Maximum	to be specified	Wk 10196 and WK 4548 under ASTM D03.14
3	Carbon Monoxide	0.2	ppm v/v	Maximum	to be specified	WK 10196 under ASTM D03.14
4	Formaldehyde	0.01	ppm v/v	Maximum	to be specified	WK 10196 under ASTM D03.14
5	Formic Acid	0.2	ppm v/v	Maximum	ASTM D7550-09	WK 10196 under ASTM D03.14
6	Helium	300.0	ppm v/v	Maximum	to be specified	ASTM D03.14
7	Hydrogen Fuel Index	99.97	% ^(a)	Minimum	to be specified	
8	Nitrogen and Argon	100.0	ppm v/v	Maximum	to be specified	WK 4548 under ASTM D03.14
9	Oxygen	5.0	ppm v/v	Maximum	to be specified	WK 4548 under ASTM D03.14
10	Particulate Concentration	1.0	mg/kg	Maximum	to be specified	WK 9688 and WK 21611 under ASTM D03.14
11	Total Allowable Non-Hydrogen, Non-Helium, Non-particulate constituents	100.0	ppm v/v	Maximum	to be specified	
12	Total Non-Hydrogen Gases	300.0	ppm v/v ^(c)	Maximum	to be specified	
13	Total Halogenated Compounds	0.05	ppm v/v	Maximum	to be specified	WK 23815 under ASTM D03.14
14	Total Hydrocarbons	2.0	ppm v/v ^(d)	Maximum	to be specified	WK 22378 under ASTM D03.14
15	Total Sulfur Compounds	0.004	ppm v/v	Maximum	to be specified	WK 24073 under ASTM D03.14
16	Water	5.0	ppm v/v	Maximum	to be specified	WK 10196 and WK 4548 under ASTM D03.14
Footnotes to Table 1:						
a. Hydrogen fuel index is the value obtained with the value of total gases (%) subtracted from 100 %.						
b. Total Gases = Sum of all impurities listed on the table except particulates.						
c. Total Hydrocarbons may exceed 2 ppm v/v only due to the presence of methane, provided that the total gases do not exceed 300 ppm v/v.						
* The FTC's Fuel Rating Rule (16 CFR Part 309) see the requirements in "Labeling of Alternative Fuels" at http://www.ftc.gov/bcp/edu/pubs/business/autos/bus29.shtm requires dispensers to bear an declaration of minimum percent of hydrogen determined according to test methods described in "Standard Test Method for Analysis of Natural Gas by Gas Chromatography (ASTM D1946)						
Updated 1/20/2010						

The FSS will monitor national and international standard activities, research, and other programs to avoid duplication of effort and to ensure that its work provides a fuel specification for hydrogen vehicle fuel that serves the needs of the this emerging marketplace. Quality standards are currently under

development in SAE International (e.g., SAE J2719 “Hydrogen Specification Guideline for Fuel Cell Vehicles”) and in ASTM International (e.g., see www.astm.org for a list of the work underway in its Committee D03.14 on Hydrogen and Fuel Cells and that organizations other committees).

Quality standards are under consideration around the world, including the European Union, Japan, and other countries. Also of interest are the efforts of Working Group 12 of ISO’s Technical Committee 197 on Hydrogen, which is very active in this area.⁷ ISO’s website indicates that its fuel quality standard will be finalized within a few years.

When a quality property and numerical value (defining a maximum or minimum limit) is added to the specification, appropriate test methods must then be identified. As test methods are identified and adopted by the FSS, they will be added to Column 6 in Table 1.

Future work of the FSS may include the development of recommendations for field sampling equipment and handling procedures, along with suggestions about what type of test equipment is appropriate for establishing a hydrogen vehicle fuel quality laboratory.

For Further Information or to Comment Contact:

Please send comments and suggestions concerning the proposals presented in this document to Ms. Lisa Warfield or Mr. Ken Butcher, Technical Advisors to the USNWG Fuel Specifications Subcommittee, at lisa.warfield@nist.gov or (301) 975-3308 or kbutcher@nist.gov or at (301) 975-4859. Faxes may be sent to (301) 975-8091.

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http://www.iso.org/iso/standards_development/technical_committees/list_of_iso_technical_committees/iso_technical_committee.htm?commid=54560. (Viewed 9/2/09)

ⁱ **Additional Information on the Importance of a Method of Sale** – Establishing a uniform method of sale ensures marketplace integrity and increases consumer confidence while ensuring fair trade practice in a competitive marketplace. In past experience, the lack of a legal standard of sale has resulted in sellers establishing different methods of sale for the same product. This resulted in investments in weighing and measuring equipment and spending on packaging and marketing programs, only to find that the units of measurement used were not appropriate for the commodity. Once a new standard was established, existing measuring equipment, labeling, and sales literature had to be retrofitted or discarded. Establishing a method of sale early in the process informs the designers of weighing and measuring devices about how they are to design the device and the user interface. It also enables marketers to create sales and promotional programs for the product using a consistent unit of measurement throughout the system. Past experience with conflicting methods of sale has taught weights and measures and sellers many valuable lessons over the years. One of the most important lessons is that consumers are intelligent and willing to learn new methods of sale and readily accept products and services, if the information they receive from different sellers is informative, uniform, and accurate. Establishing a uniform method of sale will also inform automobile and fuel cell manufacturers about how they will need to educate consumers in sales literature and owners' manuals about the fuel and how it will be measured for dispensing into the vehicles and other refueling applications. Decisions are needed so that as marketing and promotional ideas are being considered and developed, the uniqueness of the fuel and dispensers can be addressed using a single unit of measurement.

ⁱⁱ **Additional Information on the Gasoline Gallon Equivalent** – A question at the FSS March 2008 meeting was whether the marketing of hydrogen vehicles against those that use fuels sold on the basis of a gallon would benefit from the establishment of a gasoline gallon equivalent (GGE). GGEs are based on energy content of fuels. GGE for hydrogen is mentioned in the media and government literature as 1 kg = 119,823 kilojoules (kJ) (113,571 BTU (lower heating value)). GGE is used to compare the fuel in terms of price per gallon and to introduce hydrogen as a commercial vehicle fuel. This approach facilitates those comparisons as long as it is also understood that the energy content in a gallon of fuel varies widely with the fuel. When the GGE for Compressed Natural Gas (CNG) was developed as a legally defined value in the 1990s, one reason for its adoption was to allow consumers to compare the cost of competing fuels on street signs and on dispensers in a unit of measurement that was comparable among fuels such as gasoline. Thus, consumers could determine the potential savings when choosing a vehicle capable of using one type of fuel over another. In 1994, the GGE was set at 2.567 kg for CNG by NCWM using the lower heating value of gasoline, which was then given at 120,401.7 kJ (114,118.8 BTU). It should be noted that the adoption of the GGE for CNG was somewhat contentious. A proposal to add a diesel gallon equivalent (DGE) for CNG is expected to be on the NCWM's agenda in 2009.

It is difficult to make accurate comparisons between fuels because energy content varies by fuel, by region, and season for gasoline. Currently, the *Transportation Energy Data Book* lists the net energy of a gallon of gasoline at 121,753.4 kJ (115,400 BTU) and diesel as 135,785.7 kJ (128,700 BTU). Variations in energy content increase when gasoline is blended with Ethanol (E10 or E20) and E85 (15 % gasoline + 85 % ethanol) which contains only 89,679.76 kJ (85,000 BTUs) according to the National Ethanol Vehicle Coalition. Hydrogen fuel, which is expected to come into the marketplace as a commercial fuel within the next ten years, will be competing for customers who have far more fuel choices than are currently available. If a GGE is considered for hydrogen, the question that should be asked is "Would a GGE based on today's net energy content for hydrogen be a valid tool 10 years from now to compare it against gasoline, CNG, E85, diesel, and other fuels and the new electric cars expected from automobile manufacturers?"

Because of constant changes in energy policies and environmental concerns, new fuels and blends will continue to emerge in the marketplace. This constant state of change impacts the validity of GGEs. One question that must be raised if a GGE for hydrogen is proposed is, will these artificial comparison tools be periodically reviewed to ensure they provide the equitable means of ensuring reasonable and reliable comparisons between fuels.