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February 12, 2009

Committee on General Law
Co-Chair Thomas Colapietro
Co-Chair Jim Shapiro
Senator Kevin Witkos
Representative Penny Bacchicchi

Re: AN ACT TO REQUIRE THE USE OF FUEL ADDITIVES IN DIESEL FUEL
SOLD FOR THE OPERATION OF MOTOR VEHICLES OR POWER PLANTS.

To Whom It May Concern:

Global is a large independent marketer of heating oil, diesel fuel and gasoline throughout the Northeast and mid Atlantic States. We own, operate, or thruput at 9 terminals in Connecticut and at over 50 terminals throughout the rest of our marketing area.

We are opposed to this bill for the following reasons:

1. Lack of empirical data demonstrating products performance. Customers could be forced to increase fuel costs without getting the desired results.
2. OEM position on additive use. Many OEM engine manufacturers have concerns and in some cases void warranties for use of additives that they do not approve.
3. ASTM conformance...Does the additive alter the D 975 or D396 fuel specs in any way?
4. In border areas this could make our fuel uncompetitive with fuel supplied from surrounding States thereby hurting Connecticut dealers.
5. There are compatibility concerns with premium additives we and others are currently using. These additives are very important especially in winter because they allow the fuel to operate at the cold ambient temperatures experienced in our area.
6. There is a lack of infrastructure to inject additional additives and it is very expensive to add that infrastructure.