



COMMONWEALTH of VIRGINIA

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MEMORANDUM

To: Eric Olson
Executive Director
Virginia Department Professional and Occupational Regulation – Board for Contractors

From: Joshua E. Laws
Assistant Attorney General

Date: June 10, 2020

Subject: Letter of Assurance for Repeal of Regulations – Regulations Governing Natural Gas Automobile Mechanics and Technicians found at 18 VAC120-50

I have reviewed the Department of Professional and Occupational Regulation’s (the Department) proposed repeal of regulations – Regulations Governing Natural Gas Automobile Mechanics and Technicians found at 18 VAC120-50 that was posted on the Virginia Regulatory Town Hall on June 4, 2020. In my view, as counsel to the Department of Professional and Occupational Regulation and the Board for Contractors, these regulations may be repealed pursuant to Chapter 1168 of the 2020 Acts of the General Assembly, which repealed Chapter 23.4 (54.1-2355 through 54.1-2358) of Title 54.1 of the Code of Virginia.

The regulations do not appear to conflict with the Constitution of the United States or the Constitution of the Commonwealth of Virginia, nor do they appear to conflict with any federal or state law currently in effect. Further, I certify that the proposed changes are exempt from the Administrative Process Act under Code of

Virginia § 2.2-4006(A)(4) as the changes are “[n]ecessary to conform to changes in Virginia statutory law or the appropriation act where no agency discretion is involved.”

This memorandum addresses legal matters only and is not intended to serve, nor should it be construed, as a comment for or against the merits of the proposed regulations.