

June 24, 2010

Ms. Brenda Edwards-Jones  
United States Department of Energy  
Building Technologies Program  
Mailstop EE-2J, Room IJ-018  
1000 Independence Avenue, SW  
Washington, DC 20585-0121

Re: Petition of Massachusetts, Furnace Efficiency Standard EERE-BT-PET-0024

Dear Ms. Edwards-Jones:

This letter is in support of Massachusetts' Petition to Exempt from Federal Preemption Massachusetts' 90% Annual Fuel Efficiency ("AFUE") Standard for Non-weatherized Gas Furnaces, dated October 1, 2009 ("the Petition").

Meeting the energy needs of western Massachusetts for more than 150 years, Berkshire Gas provides natural gas service to 36,000 customers in Berkshire, Franklin and Hampshire Counties. For many years, the Company has provided its customers with information and programs to assist them in controlling their energy costs, including comprehensive energy efficiency programs. Energy efficiency is the consumer's best defense against higher energy prices and the economic and environmental consequences of imported fossil fuels. Setting an aggressive appliance standard, such as the one presented in the Petition, will make a critically important contribution to the energy efficiency goals for Massachusetts consumers.

Extreme winter weather and a high number of annual degree-days in our region makes savings through energy efficiency all that much more important to Massachusetts consumers. Strong fuel efficiency standards would provide important public benefits in the Commonwealth of Massachusetts.

Massachusetts has taken a leading role in promoting energy efficiency and clean energy goals through the Global Warming Solutions Act ("GWSA"), 2008 Mass. Acts Ch. 298 and the Green Communities Act ("GCA"), 2008 Mass. Acts Ch. 169. The GWSA requires the Commonwealth to reduce GHG emissions by 80% (from 1990 levels) by 2050, and to set interim GHG emission limits for 2020, 2030 and 2040. Energy efficiency goals set forth in the GCA include reducing fossil fuel use in buildings by 10% (from 20078 levels) by increasing the efficiency of

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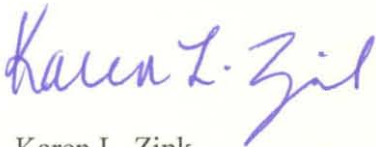
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both equipment (e.g. appliances) and the building envelope, and meeting at least 25% of the Commonwealth's electric load through energy efficiency and other demand-reduction measures.

Implementing the 90% AFUE standard is an important step in support of the Commonwealth's efforts to meet its GHG reduction goals and energy use priorities. The standard will save money for Massachusetts citizens, and will serve as a model for other states and the nation, as a whole. We respectfully ask you to assist the Commonwealth of Massachusetts in achieving its energy efficiency objectives by approving the Massachusetts petition.

Thank you for your consideration.

Sincerely,



Karen L. Zink  
President, Treasurer and Chief Operating Officer