



MASSACHUSETTS UNION OF PUBLIC HOUSING TENANTS

784 WASHINGTON STREET, SUITE 504
DORCHESTER, MA. 02124
(617) 825-9750 PHONE (617) 822-0238 FAX

Ms. Brenda Edwards-Jones
United States Department of Energy
Building Technologies Program
Mailstop EE-2J
Room 1J-018
1000 Independence Avenue, SW
Washington, DC 20585-0121

April 1, 2010

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

Dear Ms. Edwards-Jones:

I am writing 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.")

As you know, energy is fast becoming one of the pressing issues of our time. Emissions from fossil fuel combustion contribute greatly to global warming, energy costs burden consumers, and, energy independence is fast becoming synonymous with national security.

Setting aggressive appliance standards, such as the one presented in the Petition, is integral to reducing energy consumption, especially in Massachusetts, where "unusual and compelling" circumstances related to energy exist. Massachusetts residents are burdened by some of the highest energy costs in the nation. In addition, the number of "heating degree days" in Massachusetts greatly exceeds the national average. This combination of high energy prices plus long cold winters results in Massachusetts residents needing to spend more on energy than the average U.S. resident. Moreover, the unusually high number of renters in Massachusetts means that a greater number of Massachusetts residents are not in the position to choose the efficiency of the furnace used to heat their homes.

Greenhouse gas (“GHG”) reduction and energy efficiency goals expressed in recently enacted Massachusetts legislation—the Global Warming Solutions Act (“GWSA”), 2008 Mass. Acts Ch. 298, and the Green Communities Act (“GCA”), 2008 Mass. Acts Ch. 169—reflect these realities. 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 2007 levels) by increasing the efficiency of 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.

Implementation of product and appliance standards is integral to Massachusetts achieving these goals, and is an effective, least-cost tool for reducing energy use and GHG emissions. If granted, the 90% AFUE standard would greatly reduce energy use, costs, and GHG emissions. As explained in the Petition, implementing the standard would, between 2013 and 2030, save the state approximately 19.4 million therms in terms of gas usage and \$144 million in heating costs, and reduce GHG emissions by approximately 100,000 metric tons over the same time period. The average household buying a 90% AFUE furnace would see savings of approximately \$3,600 over the life of the furnace—approximately \$180 in annual fuel costs.

There is a separate Agreement¹ among various industry groups (AHRI and others) and various energy efficiency advocacy groups (American Council for an Energy-Efficient Economy and others) which urges DOE to adopt the 90% AFUE standard in many states. But there is no deadline by which must act on this voluntary agreement. I therefore urge you to approve the Massachusetts petition by the October 2010 deadline for acting on the Massachusetts petition, if not sooner.

Implementing the 90% AFUE standard is integral to Massachusetts meeting its GHG reduction goals and energy use priorities, will save money for Massachusetts citizens, and will serve as a model for other states and the nation as a whole. I strongly urge you to grant the Commonwealth’s petition.

Respectfully,

John A. Cooper, Executive Director

William H. King, Chairman

¹ “Agreement on Legislative and Regulatory Strategy for Amending Federal Energy Efficiency Standards, Test Procedures, Metrics and Building Code Provisions for Residential Central Air Conditioners, Heat Pumps, Weatherized and Non-Weatherized Furnaces and Related Matters, October 13, 2009,” available at: <http://www.standardsasap.org/documents/Furnace-ACAgreement.pdf>.