

July 7, 2010

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

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

Dear Ms Edward-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").

First some background about who we are. National Grid is a utility gas and electric distribution company providing electricity and gas to over 3.5 million consumers in New England and New York. For over 20 years, we have provided systems benefits electric and gas energy efficiency programs to our customers. Energy efficiency. Energy efficiency is the consumer's best defense against higher energy process 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 of 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 green house gas (GHG) emissions by 80% (from 1990 levels) by 2050, and 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.

Implementing the 90% AFUE standard for gas furnaces 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.

Sincerely,

A handwritten signature in black ink, appearing to read 'E. White', with a long horizontal flourish extending to the right.

Edward H. White
Vice President
Energy Products

Cc Mohammed Khan – USDOE via e-mail
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Rick Carter – National Grid via e-mail