

July 1, 2010



Ms. Brenda Edward-Jones
U.S. Department of Energy
Building Technologies Program
Mailstop EE-2J, Room IJ-018
1000 Independence Ave, SW
Washington, DC 20585-0121

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").

New England Gas Company provides gas distribution services to over 55,000 residential and commercial & industrial customers in southeastern Massachusetts. For nearly 20 years, the company has worked to provide our customers with comprehensive energy efficiency programs and information specifically targeted at them to manage their energy costs – including nationally recognized and award winning programs.

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 Greenhouse Gas ("GHG") emissions by 80% (from 1990 levels) by 2050, and to set interim GHG emissions 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 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 blue ink, appearing to read "David Black", is written over a horizontal line.

David Black
Chief Operating Officer