



One NSTAR Way
Westwood, Massachusetts 02090

June 25, 2010

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

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

Dear Ms. Jones:

NSTAR strongly supports 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").

In serving 1.4 million customers in over 100 cities and towns in Massachusetts, NSTAR takes great pride in its decades of experience in offering customers a comprehensive portfolio of energy efficiency programs. These programs and services provide our customers with ways to manage their energy costs -- a task not to be underestimated given the energy demands unique to the Northeast. Setting aggressive appliance standards, such as the one presented in the Petition, is integral to reducing energy consumption for our customers.

As you may know, Massachusetts residents have some of the highest energy costs in the nation. This is compounded by the number of "heating degree days" in our region, which greatly exceeds the national average. This combination of high energy prices and long cold winters results in our customers' need to spend more on energy than the average U.S. resident. Furthermore, 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.

I'm very proud of Massachusetts' leading role in promoting energy efficiency and clean energy goals through the Global Warming Solutions Act and the Green Communities Act. 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. The GWSA and GCA are clear demonstrations of the Commonwealth's commitment to energy efficiency and a cleaner environment.

Adopting the 90% AFUE standard is key 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. We urge you to assist the Commonwealth of Massachusetts in achieving its energy efficiency objectives by approving the Massachusetts petition.

Your consideration of this critical matter is greatly appreciated.

Sincerely,

A handwritten signature in dark ink, appearing to read "Penni McLean-Conner".

Penni McLean-Conner
Vice President – Customer Care/Energy Efficiency