



June 15, 2010

**George R. Gantz**  
Sr. Vice President  
Distributed Energy  
Resources

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

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")

Unitil provides electric and gas distribution services to 170,000 New England customers including 15,000 natural gas customers in Massachusetts. For many years, the Company has worked to provide its customers with information and programs to assist them in controlling their energy costs, including comprehensive gas and electric 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 aggressive appliance standards, such as the one presented in the Petition, is a critically important contribution to the energy efficiency goals for Massachusetts consumers.

It is important to note that Massachusetts consumers face some of the highest energy costs in the nation, and home heating demands that far exceed the national average. In addition, many of our communities have an unusually high proportion of rental properties that rely on the decisions of their landlord's relative the choice and the efficiency of their heating system. Strong fuel efficiency standards would, as a consequence, provide important public benefits in the state of Massachusetts.

Massachusetts has also 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 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.

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Implementing the 90% AFUE standard is an important step in support of the state'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 state of Massachusetts in achieving its energy efficiency objectives by approving the Massachusetts petition.

Thank you for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "George R. Gantz". The signature is stylized and cursive, with a large initial "G" and "R".

George R. Gantz

Senior Vice President, Distributed Energy Resources