

TO: State of New York Public Service Commission
FROM: Comlinks, Community Action Partnership
DATE: March 3, 2005
SUBJECT: Case 05-M-0090 – In the Matter of the System Benefits Charge III

You have asked for our comments on whether funding levels are appropriate, if the program should be continued and how well the program has achieved its goals and objectives. Our comments which follow are keyed to the 14 questions listed on page 3 and 4 of your 1/28/05 notice.

General Observations

Comlinks, a Community Action Agency based in Malone NY, administers many of the programs funded by the SBC charges. Our primary service area is Franklin County but we also act as Program Manager for some SBC funded programs in the other counties in upstate NY. In general our service area represents the coldest and poorest part of New York State. Our housing stock on average is older and therefore often poorly insulated. The continuing rise in energy costs, the deterioration of our manufacturing base, and the recent closing of some of our last major manufacturing activities has meant that our population is often unable to afford energy saving refrigerators, efficient light bulbs etc., that could reduce their energy bills. So our residents, who are poor and cold encounter inefficient and dangerous furnaces, chimneys, and hot water tanks, failing septic systems, no heat situations, leaky roofs and so on a daily basis.

Because of SBC funded programs like WNI, Empower and the other programs you provide and particularly because of the possibility to coordinate, leverage and integrate your programs with other programs, we were able to improve many hundreds of peoples' living conditions in the last year. For example in the administration of a 2002 HUD grant for the Village of Malone we were able to realize an additional \$41,000 of energy improvements over and above the HUD grant by marrying SBC programs with the HUD programs. If you continue to fund us we will continue to send crews out there every day responding to needs.

Another point we want to emphasize, is all the SBC programs trickle down to us through statewide agencies, subcontractors, and field reps and program managers. These people we deal with every day, in all these programs, are personally committed to them and really hustle. They return calls, give us good support and are easy to deal with. The administrative structure that has been set up to manage all these programs may look a little like Rube Goldberg on paper, but it works for us. We just cannot say enough good things about NYSERDA and Honeywell and AEA.

The major comment we would make is on #2, and it is our most important comment on the whole document. Please do not allow any funding gap or lag to appear between the end of this program and its reauthorization. We do not have the financial reserves to keep our trained but underpaid crews on staff for very many weeks if we do not have work for them for which their reimbursement is certain. We can't perform work without the certainty of payment. Even a gap of a month would place our technical capability at risk because if we lose trained crew it will take us a while to restore our technical capability.

Comments on some of the questions.

(3). Have conditions changed since SBC was established?

Since the program was established many things have changed. ALL in directions that suggest the program should be expanded not reduced. Energy costs have increased while the economy has remained flat so fuel and energy consume a larger percentage of the average budget. Your programs all work to reduce the energy component of the family budget so recent energy cost and economic trends all argue for the program's expansion.

Of course since the program was established the need for our country to become energy independent has become an important element of our national security, perhaps the most important. Every program SBC funds, directly or indirectly, including the education component, reduces our energy dependence as all these programs result in reduced consumption of energy. For all practical purposes your programs represent a substantial portion of the hands-on, day to day activities which actually reduce energy consumption. A national security rationale alone could argue that your programs should be squared. We have begun thinking about the SBC and weatherization programs as a kind of national security and energy independence programs and when we do everyone involved in the program as consumer or program deliverer instantly "gets it".

(4-8). How can programs be improved and adjusted?

We understand that consideration is being given to liberalizing the loan qualification procedures for Home Performance and AMF; we encourage you to do this as much as possible subject to the necessary demands that an acceptable loan to equity relationship be maintained. Also we understand that for Empower, the PSC or NYSERDA will be taking a look at the referral procedures and policies which are not the same between NIMO and NYSEG, our two suppliers. The percentage of referrals allowed from Office of Aging should be increased to the maximum you can justify. Ideally the referral policies in place for NYSEG should become the uniform standard. As it is we really have an uneven application of the program based on the vagaries of address.

(13). Natural Gas Pilot.

We applaud the pilot for natural gas and suggest you expand it to oil too. Just as benefits should be awarded irrespective of the type of energy used or who happens to be the energy supplier, statewide programs to reduce energy consumption should be funded by taxing all fuel types equitably.

Thank you for the opportunity to comment on this document.

Sincerely,

Nancy Reich
CEO
Comlinks