



March 10, 2005

Jacyln A. Brilling, Secretary
New York State Public Service Commission
3 Empire State Plaza,
Albany, NY 12223-1350

RE: Systems Benefit Charge Program Review

Dear Ms. Brilling,

We write in response to the request from the Department of Public Service for comments on the SBC program. As a renewable energy consulting and product sale, distributions and installation firm, we have been direct and indirect beneficiaries of the SBC funded programs. The following are our responses to the questions posed for CASE 05-M-0090:

1. From Global's perspective, the Commission's goals are being adequately achieved. Although still in the embryonic stage, the renewable energy industry has seen positive growth, with increase market penetration. This is due in great part to the SBC programs that foster and support market development and awareness.
2. Our responses are based upon the knowledge that the incentive monies for the PV systems are now being funded and administered through the RPS. We would urge continuation of the SBC programs through at least 2010, at the current funding level.
3. The change most affecting the industry is the worldwide module shortage. Consequently, directing more funding toward in-state silicon and module productions would be extremely valuable. In addition, significant changes to the net metering and interconnection rules and regulations should be incorporated to bring New York en par with other states such as New Jersey. For example, businesses should be allowed to net-meter and the system size limit should be increase to 2 MW.
4. Prioritization of goals to meet objectives: Supply development is primary, then continuing market awareness and upgrading rules and regulations would be GRO's recommendation prioritization.
5. As noted in #2, our responses are all based upon the RPS in operation.
6. We are pleased with the efficient wiring of funds directly into our account upon approval of each stage. We encourage the continuation of the systems benefit charge as a proven, accepted, valuable way to raise funds for this important work.
7. Programs to expand: Silicon manufacturing, PV manufacturing, and improvement/expansion of the consumer loan program – it needs to be made easier for the consumer to obtain.
8. The SBC funded programs can be more responsive to the needs of NY's energy consumers by improving the loan program noted in #7.

9. The SBC programs are marketed well now from GRO's perspective.
10. We have been pleased with the administrative help received from NYSERDA – reachable, responsive, and attentive. We feel they work with us as part of a team to achieve mutual goals.
11. The evaluation process for the incentives is reasonable but could always be streamlined more. Rather than each year adding more upfront paperwork, possibly allocate more funding toward field review and checking. All upfront work required by installers adds to the cost of the PV systems. We very much appreciate the 75%/25% payment arrangement.
12. In general, our answer is no, with the possible exception of the study and implementation of solar distributed generation on weak distribution lines in lieu of feeder upgrades.
13. Global's philosophy addresses the whole picture, from insulation, windows and structure orientation, passive solar design, energy efficient appliances through to the renewable energy generation. A) We would encourage expansion to natural gas customers who would benefit from solar hot water for domestic hot water as a minimum through to supplementing heating and passive solar design. B) Residential customers would benefit mostly, but certain industries and commercial customers, depending on their hot water usage and/or heating needs might benefit as well. C) The natural gas benefit should not affect the electric – it should be incorporated in addition to at a level which allows for adequate training of installer, proper market awareness, market development, and sufficient incentive moneys to meet the demands for at least the initial 5 years. D) 5 year minimum initial duration is recommended. E) Evaluation based upon FCC rated BTU/panel. We can provide information about Vermont's program if desired.
14. Other: Covered above.

If you have any questions, please do not hesitate to call us.

Very truly yours,
GLOBAL RESOURCE OPTIONS, INC.

Dorothy M. Wolfe, P.E.
President