

   
**Lighting  
Research Center**

Mr. D. May  
ETB  
 Rensselaer

February 17, 2005

Ms. Jaclyn A. Brillling, Secretary  
New York State Department of Public Service  
3 Empire State Plaza  
Albany, New York 12223-1350

**ENERGY  
RESOURCES  
FEB 23 2004  
AND THE  
ENVIRONMENT**

RE: Case 05-M-0090

Dear Ms. Brillling:

Enclosed is one original and 15 copies of this letter commenting on *Matters for Comment of the System Benefits Charge III* in the above referenced case

**MATTERS FOR COMMENT**  
Question 2

The Lighting Research Center (LRC), a part of Rensselaer Polytechnic Institute, supports the continuation of system benefit charges (SBC) on electric customers' bills to fund energy efficiency programs and certain energy research beyond its current expiration date of June 30, 2006. New York's expenditures of SBC funds have shown themselves to be cost effective for the electric customers of the state based on the program evaluations conducted by New York State Energy Research and Development Authority. The energy efficiency programs and research efforts are having a positive effect in permanently reducing electric energy use and peak electric demand.

Specifically, the LRC wishes to comment on the necessity, adequacy and benefits of continuing to fund research and development through the SBC. Developing and demonstrating new energy efficiency technologies is a necessity if improvements in energy efficiency are to continue. Assisting New York based industries in the development of these products ensures the continuation of energy efficiency technologies and the economic development of New York industries. Funding from the current research and development allocation has assisted New York based industries to develop innovative, efficient lighting and to have their products tested and demonstrated. These products are entering the marketplace and will be manufactured within the state, creating jobs. The New York State Excellence in Lighting program and the Demonstration and Evaluation of Lighting Technologies and Applications program, both managed by the LRC, assist lighting manufacturers to build better, more efficient lighting products.



Similarly, the SBC research and development funds have been used to test the claims of new energy efficient lighting technologies to ensure they meet consumer needs and save energy. This protects the public against misleading information sometimes published by manufacturers. The National Lighting Product Information Program, administered and operated by the LRC, performs this function for New York State.

Current funding levels for the research and development portion of the SBC have been adequate to promote the development of efficient lighting technologies. However, additional funding would be desirable for technology development of new, highly efficient lighting sources and uses such as solid state lighting and lighting used for demand reduction. Solid state lighting has the ability to reduce lighting energy needs by 50% as the development of this technology reaches its potential of 200 lumens per watt. Today's fluorescent technology, by comparison, is 95 lumens per watt and is not expected to become much more efficient. Peak electric demand reduction from cost effectively reducing lighting energy needs by 30% is possible without compromising worker productivity. Both of these technologies need further research, application development, demonstration and evaluation that can only be achieved with additional research funding. They also offer economic development opportunities for New York based companies to initiate or expand operations into manufacturing these products.

Thank you for the opportunity to comment on the need to continue SBC funding for the research and development of high efficiency lighting products that will meet the needs of New York state businesses and citizens.

Sincerely,

A handwritten signature in black ink, appearing to read 'Mark Rea', with a large, sweeping flourish extending to the right.

Mark Rea, PhD, FIES  
Director and Professor