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**New York  
Interfaith Power and Light**

**Jaclyn A. Brillling**  
**Secretary**  
**New York State Public Service Commission**  
**3 Empire State Plaza**  
**Albany, New York 12223-1350**

Comments on CASE 05-M-0090 - In the Matter of the System Benefits Charge III.

February 28, 2005

Secretary Brillling:

New York Interfaith Power and Light (NYIP&L) appreciates the opportunity to comment on the past, current and future of the System Benefits Charge. NY IP&L is a not for profit 501(c)(3) faith-based organization that promotes stewardship of God's creation through energy conservation, energy efficiency, and the use of renewable energy. As such, we share in common many of the goals and objectives of the SBC. NY IP&L is one of over 30 state based interfaith organizations dedicated to these efforts.

NY IP&L's primary comment relative to the SBC relates to the Energy Audit Program. In particular, we are concerned with that portion of the program operated by NYSERDA that provides service to not-for-profit institutions with annual electric bills less than \$100,000. This program, combined with the Smart Equipment Choices and Loan Fund, facilitates our mission of promoting faithful and just stewardship of God's creation through energy conservation, energy efficiency and the use of renewable energy. New York can be proud of the leadership that these programs provide people in New York State, as well as the model they provide for the rest of the nation.

The success of the SBC is in part measured by the communication and implementation of its goals and objectives. Worship facilities of all faiths are commonplace in all New York communities. NY IP&L's goal is for these facilities to be models of energy/environmental/creation stewardship and to provide another avenue of communication about energy stewardship to the New York residents. We are approximately one year into NY IP&L's effort and we favor the Energy Audit, Smart Equipment Choices and Loan Fund Continuation.

With respect to your requested particular areas of comment:

1. To what extent have the goals and objectives established by the Commission been achieved?

*From our perspective the foundations are in place with implementation continuing to mature.*

2. Should the SBC program continue beyond its current expiration date of June 30, 2006?

*Yes.*

If so, for what duration should the SBC be extended and at what funding level?

*The funding for the Energy Audit, Smart Equipment Choices and Loan Fund will likely expand as our effort continues to grow. Our current target is 100 member congregations by 2006. A minimum five (5) year period for continuation should be considered for program stability.*

3. Have conditions changed since the establishment of the SBC that would necessitate a change in the overall goals and objectives of the SBC? If so, what changes are recommended?

*Yes. The stability of the oil fossil fuel supply from the Middle East remains in question. This, accompanied by an increased demand from the growing economies of India and China for this same resource should provide for renewed efforts toward energy efficiencies and renewable supplies.*

4. If assuming continuation of the SBC, how should programs be prioritized to meet those goals and objectives?

*As with the results of the Energy Audits, the most cost-effective methods should be pursued. Education, communication, and motivation are essential elements of this effort and should be given priority. The interfaith community is an excellent avenue for all of these elements.*

5. How might the SBC programs be adjusted given the Commission's order, issued September 24, 2004, regarding a Renewable Portfolio Standard (Case No. 03-E-0188)?

*One adjustment would be to provide continuing and expanded support to those initiatives promoting renewable energy, such as exemplified by NY IP&L.*

6. In what ways might the current SBC fund collection and allocation process be improved?

*We would suggest that improvement be gauged, in part, by the effectiveness of the program to have the greatest involvement while assisting the least among us - the poor and elderly.*

*We support the continued environmental monitoring efforts underwritten by this program, as exemplified by the New York's Acid Deposition Monitoring Program.*

7. What specific program(s) should be eliminated, expanded or created?

*As noted above, we would anticipate a need for expand commitment to not-for-profit facilities as our program grows.*

8. How can future SBC funded programs be more responsive to the needs of New York's energy consumers?

*New York's Energy Policy may want to revisit a philosophy of continued and expanded consumption. We view continued demand growth - exemplified by larger vehicles and residences - as counterproductive to energy efficiency and renewable efforts.*

9. How can SBC funded programs be marketed more effectively?

*We believe that support to grass roots efforts, as represented by NY IP&L, is one avenue.*

10. In what ways can NYSERDA improve its administration of the SBC?

*No comment.*

11. Is the current NYSERDA program evaluation process adequate? How might it be improved?

*No comment.*

12. Should SBC funds be extended to programs that encompass research and development into retail and/or wholesale electric market competitiveness issues, or transmission and/or distribution of the State's energy resources?

*This has the appearance of underwriting the normal costs of the operating utilities and should not be undertaken, unless demonstrated otherwise.*

13. Should the scope of the SBC program be expanded to include programs for natural gas customers?

*This has the appearance of underwriting the normal costs of the operating utilities and should not be undertaken, unless demonstrated otherwise.*

If so:

a. What kinds of programs would benefit New York's gas consumers?

b. Which classes of customers would be served most effectively by a natural gas SBC program?

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c. How should a natural gas SBC program be funded and what annual level of funding might be considered reasonable? How might a natural gas SBC affect current electric SBC funding levels?

d. What should be the initial duration of a natural gas SBC, and should that term coincide with the extension of an electric SBC, if the electric SBC is extended?

e. How might a natural gas SBC be administered and evaluated and how should it differ from the administration of the electric SBC?

14. Do you have any other suggestions for improving the overall SBC program that are not addressed by the above questions?

*No Comment.*

Sincerely,

Janet Allen, President

New York Interfaith Power & Light