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February 25, 2005

STATE OF NEW YORK
PUBLIC SERVICE COMMISSION
3 Empire State Plaza
Albany, New York 12223-1350

Re: CASE 05-M-0090 - In the Matter of the System Benefits Charge III.
RESPONSE TO NOTICE SOLICITING COMMENTS
(Issued January 28, 2005)

Dear Members of the Public Service Commission:

I am happy to provide comments in response to specific questions issued on January 28, 2005 for CASE 05-M0090. These responses are offered by me as an academic principal investigator funded by the NYSERDA Environmental Monitoring, Evaluation and Protection (EMEP) Program under award #7616, for projects "Sampling and Analysis of Acidic Organic Compounds in the New York City Area" (funded May 2003, $228,890) and "Chemical Composition of Fine Particulate Matter from Urban and Regional Background Locations in New York State"(funded September 2004, $450,000).

Separate from the specific questions, I would like to communicate the important role NYSERDA has played in the development of a molecular level organic analysis capability for fine particulate matter in urban and regional background airsheds in New York State. This technology is now supporting advanced molecular level measurements of organic compounds present in fine particles in partnership with NYSDEC Division of Air Resources, Bureau of Air Quality Surveillance (BAQS) monitoring sites in Queens and the Bronx, and at Pinnacle State Park in the Southern Tier of NY. Atmospheric abundance, chemical composition, and sources of the fine particles organic matter are linked to federal fine particle programs measured at these NYSDEC sites. This organic chemical information is critical for controlling sources of fine particles and for reducing exposure to harmful airborne particles by the citizens of New York State, particularly in metropolitan areas. In addition, funding from the NYSERDA EMEP Program is responsible for a new partnership with the NYSDEC Automotive Emission Laboratory (AEL) that will update the emissions inventory for cars and trucks operating on NY highways by generating chemical "source profiles". These molecular level chemical profiles will be used to improve control strategies for major vehicle types, reducing the fine particles they emit in the NY region, and setting current benchmarks for fuels and emissions. Finally, the NYSERDA EMEP Program Managers deserve special recognition, not only for program management activities, but also for their scientific knowledge and contribution to the actual projects by connecting and facilitating key resources and people.

The NYSERDA research programs provide great benefit to the citizens of New York State. It is a solid public benefit program that has generated innovative, energy-efficient and environmentally beneficial products, processes, and services. The System Benefits Charge is an important

mechanism where NY energy consumers can choose to invest in forward-thinking energy programs that will fundamentally influence their quality of life in both the near and long-term future. Below are my responses to questions. Only those are answered where I have direct knowledge. Thank you very much for the opportunity to comment on the NYSERDA Program.

Sincerely,

Monica A. Mazurek
Assistant Professor

MATTERS FOR COMMENT

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

With respect to the EMEP Program, NYSERDA has established a strong policy-relevant environmental research portfolio with it's component elements outlined in the "Environmental Research and Monitoring Needs in New York State" document (April 1, 2002). The multi-year research plan connects to State and federal environmental research and monitoring programs, augmenting these and bringing focus to particular issues in NY State that otherwise would not be addressed adequately. As a public benefit corporation, NYSERDA has greater flexibility to adjust the focus of it's environmental research programs than typical government entities. Because of this, NYSERDA projects can respond more rapidly to environmental issues in NY State.

2. Should the SBC program continue beyond its current expiration date of June 30, 2006? If so, for what duration should the SBC be extended and at what funding level?

Yes, the SBC program should be extended for a minimum five-year duration. Funding should remain at the same level or higher. Effects of energy-related pollutants will continue as environmental issues in NY State. Energy use policy must continue to link to environmental research, monitoring and control strategies. NYSERDA's EMEP program addresses this fundamental linkage.

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?

Energy resources are changing continually. New fuels and alternative, renewable energy sources should factor more heavily into the SBC with a view to how this effects the environment using measurement and modeling approaches. The goals and objectives of SBC seem to have been written in a broad enough fashion to take this into account. No changes are recommended.

4. If assuming continuation of the SBC, how should program goals be prioritized?

The overall goals and objectives of the SBC remain current and relevant. Greater public education and outreach should have a more visible role, especially with links to K-12 education by updating curriculum in science and technology. Efficient energy use, new and renewable energy sources, and personal responsibility for energy choice are themes that can be woven into K-12 curricula. Providing relevant content and science units for K-12 teachers in NY State should be a highly articulated goal for NYSERDA. New York's young citizens will have many important energy

decisions to make as adults. Broadening their technical understanding at a young age is critical and is an important long-term investment.

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)?

No opinion.

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

No opinion.

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

Expand consumer energy education and K-12 science and technology education (see comment #4).

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

No opinion.

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

No opinion.

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

No opinion.

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

No opinion.

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

No opinion.

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

No opinion.

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

No.