



sea gull lighting®

Jeffrey Beiter

Director, Business Development
Energy Efficient Products

Phone: 610.688.8939

Fax: 610.688.3623

JBeiter@SeaGullLighting.com

February 3, 2005

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

Honorable Secretary:

On behalf of Sea Gull Lighting Products, Inc., I would like to take this opportunity to respectfully respond to the commissions request for public comments on the value and potential extension of the Public Service Commission's establishment of the System Benefits Charge (SBC) established July 1, 1998.

It is our opinion that the competitive markets have not and do not adequately address the important electric demand reduction component required to adequately transform the utility market.

Rate payers and residential consumers do not understand the impact supply side only philosophy of the competitive market will have in terms of increased utility cost and decreased environment conservation. Demand reduction components have demonstrated to reduce energy consumption, increase efficiency and promote environmental conservation.

To that end please allow me to offer input on the following:

1. We believe the goals and objectives of the commission have been achieved and are beginning to show significant signs of growth by way of additional innovative product development in the lighting industry. It has allowed manufacturers such as Sea Gull Lighting to expand development of and sale of highly efficient lighting products within the State of New York. This growth has also been seen in increased consumer awareness of and request for the ENERGY STAR brand.
2. We believe the SBC program should continue for a minimum of five (5) years and the funding level be increased to \$200 million.
3. We do not believe there should be any change to the SBC goals and objectives; current goals and objective should remain the same.
4. We believe the programs and consumers would benefit more if the goals and objectives placed more emphasis on sustained retail and consumer product development; provided continued and increased awareness to the benefits to demand

Sea Gull Lighting Products, Inc.
301 West Washington Street
Riverside, NJ 08075

phone:

800.414.5112

fax:

856.764.0024

www.SeaGullLighting.com



PARTNER OF THE YEAR 2004

reduction and if the program reduced barriers between the different residential programs.

5. No comment
6. No comment.
7. We believe a great deal more kilowatts can be saved in the various Residential Product Programs than any other program and therefore we believe the commission should expand its offering and funding for Residential Programs.
8. The program is just beginning to gain recognition should therefore be left to mature or elevated to accelerate it's goals.
9. SBC funds can be marketed more effectively if core generating utility increased awareness to the demand reductions programs and benefits.
10. We believe NYSERDA would benefit if it considered consolidating its contractors and/or programs for ease of implementation and reporting.
11. No comment
12. No comment
13.
 - a. No Comment
 - b. No Comment
 - c. No Comment
 - d. No Comment
 - e. No Comment
14. We believe that SBC funds are required because the competitive, supply side market does not adequately address, support or efficiently educate consumers to the benefits demand reduction programs.

We hope and trust these comments adequately emphasize the significant importance Sea Gull Lighting Products places on the SBC component as well as our dedication to energy savings and environmental conservation.

Respectfully submitted,



Jeffrey Beiter
Director, Business Development
Energy Efficient Products



PARTNER OF THE YEAR 2004