

COMMENTS ON CASE 05-M-0090
In the Matter of the System Benefits Charge III

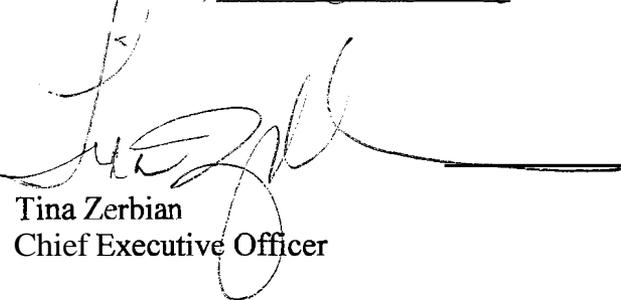
The following comments are respectfully submitted by Cattaraugus Community Action, Inc., (hereafter CCA) the community action agency serving Cattaraugus and Allegany counties' residential energy conservation needs. CCA is also the regional implementer for NYSERDA's CBO initiative, coordinating the Assisted Home Performance with Energy Star Program, and the Weatherization Network Initiative in Allegany, Cattaraugus, Chautauqua, Erie, Niagara, and Wyoming Counties.

We feel that it is imperative that the SBC program continues, and that SBC III be funded for a period of seven to ten years. Previous funding cycles of five years have been too short to allow for adequate project planning, implementation, and evaluation. Further, SBC III funding must be increased above the current \$150 million level, optimally to \$250 million. Clearly, the rapidly escalating energy costs call for high-impact strategies that can be effective and measurable in the northeast, and the current levels of funding are inadequate to address New York's needs.

CCA also supports an equal distribution between the residential and commercial allocations, and further recommends that 15-20% of the residential allocation be set aside for low income programs. The age of housing, the high percentage of substandard housing, and the poor economic conditions in Western New York call for a focused effort on the part of our policy makers to prevent utility crises and homelessness by offering equity of energy programs to the low-income. Low income residential customers should not be subsidizing industries. We ask that the PSC also maintain the definition of low-income at 80% of the State Median Income. Should SBC III be funded for 7-10 years, this would allow NYSERDA ample time to analyze the effectiveness of this funding distribution based upon available **data**, and would allow for alterations in the allocation formula if necessary.

Cattaraugus Community Action also strongly advocates for a separate natural gas SBC, similar to those operated in other northeastern states, that will provide energy conservation services to low-income, residential, and commercial users. This gas SBC should be funded for the same term as the electric SBC.

Thank you for this opportunity to comment. Should you have any questions, please feel free to contact Tina Zerbian, Chief Executive Officer, Cattaraugus Community Action, 25 Jefferson Street, Salamanca, New York 14779, 716-945-1041 Extension 111, tzerbian@ccaction.org.



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