



Together We Can Change
National Markets

RECEIVED
PUBLIC SERVICE
COMMISSION
OSEC-FILES-ALBANY

D May
05 + E (8th)

2005 OCT 17 PM 12: 50

October 14, 2005

Staff of the New York State
Department of Public Service
Three Empire State Plaza
Albany, NY 12223-1350

Dear Staff:

As the Executive Director of the **Consortium for Energy Efficiency** I am submitting these comments on the Staff Proposal for the Extension of the System Benefits Charge (SBC) and the SBC-Funded Public Benefit Program in the matter of the System Benefits Charge III, Case 05-M-0090.

I want to first state our appreciation for having New York's system benefit charge administrator as an integral part of the national consortium of efficiency program administrators. At CEE, NYSERDA works together with all the other North American administrators addressing the national aspects of delivering energy efficiency to benefit New York ratepayers. New York is more effective and contributes New York's perspective to the national effort to address common issues with national market players from strength in numbers because of NYSERDA's participation in CEE. At CEE, New York is partnering with 62 other program administrators from a total of 25 states and 2 provinces with mandated, ratepayer-funded energy efficiency programs. New York is similarly more effective in dealings with the national ENERGY STAR program through its involvement with CEE.

I also want to commend the staff for recommending a continuation of funding and a five-year extension of the commitment to SBC-funded efficiency programs. From the perspective of CEE members across North America, we are seeing expansion of ratepayer-funded investments in energy efficiency to more states and provinces as well as increases in funding for efficiency in more and more jurisdictions. Therefore, we can share with you that there is minimal risk in maintaining current SBC funding levels.

The five-year extension is also to be commended. Again, the experience of CEE members from multiple jurisdictions is that a long-term commitment to efficiency programs sends a clear signal to the market that market players can unhesitatingly commit their resources and business fortunes to advancing energy efficiency because the program encouraging their participation is not going to go away tomorrow. This is a critical component of market transformation and cost-effective efficiency resource procurement. New York should be recognized for its foresight in making this long-term commitment.

