

E3, inc.

Energy and Environmental Services

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October 17, 2005

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

RE: Comments on Systems Benefits Charge III (SBC-III)

Dear Ms. Brillling,

Thank you for the opportunity to provide input on the NYS Public Service Commission review of the SBC – III.

The SBC – III provides support to improve energy efficiency and electric energy generation capability for New York State. In our current era of global competition for energy resources, no issue is more central to the future prosperity of New York State from the point of view of economic vitality, homeland security, and the overall basic functioning of our social process.

Question 2.

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

Comment:

The program is critical to the economic and environmental health of the state. By all means the program should be extended another 5 years and doubled in size. New York State has some of the highest energy costs in the nation. To be competitive with other regions of the country, the state must provide attractive ways to reduce energy costs such as through the Distributed Generation program and Research and Development programs to improve the percentage of Renewable Energy produced in the State.

Question 7.

What specific programs should be eliminated, expanded or created?

Comment:

The programs to be expanded include:

Get Energy Smart
Power...Naturally
Premium Efficiency Motors
Small Commercial Lighting
Research and Development
Clean Energy Projects
Any and all Innovative Hydroelectric Projects Support

New York State maintains a “world class” energy research and development capability. These programs provide multiple benefits to the state with respect to improved economy and environmental quality.

Expand:

Programs that improve renewable energy productivity should be expanded. These include the DG/CHP programs that support new forms of energy technology such as wind, tidal electric, innovative hydropower, solar photovoltaic and other means of clean energy production that will facilitate improved electrical energy generation, while at the same time using no fuel and producing no pollution.

Clean energy production is the key to a sustainable and healthy future. New York State has made and can continue to make significant strides to improve the transformation to a sustainable future by meeting the goals already set forth by the Renewable (Energy) Portfolio Standards (RPS) which include 25% Renewable Energy Production by 2012.

By expanding these programs, the transformation of the energy base of the culture will accelerate enabling the infusion of capital to new industries, many of which will find homes in New York State. While this capital infusion occurs, operating costs (for energy, pollution control, public health, military drain of best manpower and vital resources) will be reduced, further accelerating the economic transformation and creating jobs focused on the improvement of the quality of life of New Yorkers. The result of this activity will make New York State more attractive for businesses and jobs and overall a better place to live.

Create:

Create a world class renewable energy institute in New York State to attract talent international talent to contribute to the technical capability required to meet the RPS goals.

For tidal electric energy generation and river based systems, this institute may be part of the Governor's recent initiative for the Estuary and Rivers Center in Beacon, New York.

Question 9.

How can SBC funded programs be marketed more effectively?

Comment:

SBC programs should be marketed by capitalizing on the school districts throughout NYS starting with K-12, and continuing to support programs that provide for an integrated understanding through college and university consortia.

The increased participation of elementary and secondary schools can enable focused growth of programs that directly impact the residential sector as well as the school infrastructure throughout the state.

By tapping the intellectual and creative resources of college faculty and students as a vital part of the curriculum, a better understanding of the impacts of the SBC will be incorporated into the general understanding. Workforce development and policy improvements will result from this type of participation, for the benefit of all.

Sincerely,

Roger Bason,
E3, Inc. – President