

Environmental
Business Association
OF NEW YORK STATE, INC.

October 17, 2005

Jaclyn A. Brillling
Secretary
Department of Public Service
Three Empire State Plaza
Albany, New York 12223-1350

Re: Case 05-M-0090 – In the Matter of the Systems Benefits Charge III

Dear Secretary Brillling:

The Systems Benefit Charge (SBC) has provided business opportunities for many of the members of the Environmental Business Association of New York State, Inc. (EBA/NYS) to both improve their own operations and to assist their fellow New Yorkers and New York businesses to become more energy efficient. The SBC, a visionary program at its inception, has significantly helped to address energy-related economic development challenges and has improved the economy in New York State. I want to advise you about how the EBA/NYS believes that the next phase of the SBC can continue to foster energy efficiency development, environmental stewardship, and economic vitality in New York State over the next several years.

The current phase of the SBC program is slated to end in June 2006. The renewal proposal now being considered by the Department of Public Service would continue the SBC programs, for a third phase, beyond this date without interruption at least until June 2011 at roughly the same funding level (\$150,000,000 per year).

The EBA/NYS believes that an eight year SBC period, from 2006 to 2014, would be both more valuable to our state and appropriate, due to the fact that SBC I and II, when taken together, encompass a similar eight year time period during which a significant rise in energy costs began to manifest itself in our state. Extending the SBC program for a like period will encourage more strategic investments that will, in turn, enable our state to manage its energy needs in an increasingly efficient and sustainable manner.

The EBA/NYS also believes that the next phase of the SBC program should be funded at approximately \$175,000,000 per year, given the steep rise in energy costs and concern about energy affordability/availability. In this period of intense pressure on both cost and availability of energy resources we believe that not to increase the annual amount provided for SBC operations would send an uncaring and uncompetitive message to, respectively, our state's citizens and businesses.

We further believe that our less fortunate citizens would be well served by having 20% of the next phase of SBC resources allocated to activities designed to benefit low income New Yorkers.

Thank you for your attention to our concerns.

Very truly yours,

A handwritten signature in cursive script, appearing to read "Ira S. Rubenstein", with a long horizontal flourish extending to the right.

Ira S. Rubenstein
Executive Director