

**KC**  
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October 14, 2005

*Via E-Mail & FedEx No.8455 1514 4999*  
Hon. Jaclyn A. Brilling, Secretary  
New York Public Service Commission  
3 Empire State Plaza  
Albany, NY 12223-1350

RE: Case 05-M-0090 – Local Unions’ System Benefits Charge III Comments on Staff Proposal

Dear Secretary Brilling:

International Brotherhood of Electrical Workers (“IBEW”), Locals 83, 249, 966 and 1143 (“System Council U-7”) and IBEW Locals 97 & 503 (collectively referred to as “Local Unions”), through their undersigned consultant, respectfully submit an original and fifteen copies of their “Comments Pursuant to Notice Seeking Comments Issued August 31, 2005. Electronic copies of this cover letter and these comments are being e-mailed to the NY PSC list-server for distribution to the parties in this proceeding.

Respectfully Submitted,

/s/ *Richard J. Koda*

Richard J. Koda, Principal

cc: Parties in Case 05-M-0090 electronically via NY PSC list-server e-mail  
Danny E. Addy, President/Business Manager/Financial Secretary, IBEW, Local 83  
David Falletta, President/Business Manager/Financial Secretary, IBEW, Local 97  
Robert V. Citrollo, President, IBEW, Local 503



## **Immediate Background**

The State of New York Public Service Commission (“Commission”) issued a public notice, on January 28, 2005, seeking responses and comments regarding a variety of questions regarding the future of the SBC program<sup>1</sup>. Over 160 responses were received, the majority of which expressed an overall favorable view of the SBC program and recommended its continuation. Based on the comments received by the Commission and Staff’s investigation of the SBC program, Staff issued its proposal for the extension of the SBC and related programs<sup>2</sup>. The Local Unions wish to offer the following comments on Staff’s extension proposal.

## **Discussion**

The Local Unions agree with Staff’s recommendation to continue funding of the SBC program for an additional five years.<sup>3</sup>

While Staff recommends revisions to the goals for SBC III to more accurately reflect today’s energy realities by proposing such goals as:

- Improve New York's energy system reliability and security by reducing energy demand, supporting innovative transmission and distribution technologies, and enabling fuel diversity, including renewable resources; and,
- Create economic opportunity and promote economic wellbeing by supporting emerging energy technologies, fostering competition, improving productivity, growing New York energy businesses, and helping to meet future energy needs through efficiency and innovation.<sup>4</sup>

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<sup>1</sup> Case 05-M-0090 – In the Matter of System Benefits Charge III: NOTICE SOLICITING COMMENTS (Issued January 28, 2005) at 1-2.

<sup>2</sup> Case 05-M-0090 – In the Matter of System Benefits Charge III: STAFF PROPOSAL FOR THE EXTENSION OF THE SYSTEM BENEFITS CHARGE (SBC) AND THE SBC FUNDED PUBLIC BENEFIT PROGRAMS (“STAFF PROPOSAL”), Dated August 30, 2005.

<sup>3</sup> *ibid.* at 13.

<sup>4</sup> *ibid.* at 14.

and addresses Transmission and Distribution Research and Development, as well as recommends the use of a limited amount of SBC funds in this area<sup>5</sup>, Staff does not take the opportunity to specifically address what priority should be given to those projects the SBC III program. As indicated in the initial comments of the Local Unions, priority should be given to projects that do the most to improve safety and reliability of electric service in New York<sup>6</sup>. These types of projects would have the greatest impact on the socio-economic well being of all New Yorkers. An unreliable electric system would cost billions of dollars in lost revenue to businesses operating in New York and puts the public at risk of injury from in-operable equipment (medical, refrigeration, etc.) normally powered by electricity.

The Local Unions agree with Staff that, as the transmission and distribution systems are improved, it is important that the upgrades utilize the latest technologies to further promote the safety, reliability and efficiency of the electricity grid.<sup>7</sup> And while Staff maintains that there remains a continued need to enhance New York's renewable resources infrastructure, which would include training of renewable energy professionals, Staff makes no mention of the training necessary for electric utility workers to use the latest technologies in promoting the safety, reliability and efficiency of the electric grid. Use of the latest technologies on the electric grid would require education and an increase in the knowledge base of the electric utility workers who would use and maintain those technologies. The Local Unions believe that use of SBC funds would be appropriate here as well.

It should not be forgotten that experienced, knowledgeable and highly skilled utility workers have attained a certain knowledge base that is essential in maintaining and repairing all elements of the

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<sup>5</sup> *ibid.* at 17.

<sup>6</sup> Comments of International Brotherhood of Electrical Workers, ("IBEW") Locals 83, 249, 966 and 1143 ("System Council U-7") & IBEW Locals 97 & 503 and Utility Workers Union of America, AFL-CIO, Local 1-2, Pursuant to Notice Soliciting Comments Issued January 28, 2005 at 3.

<sup>7</sup> STAFF PROPOSAL at 17.

State's transmission and distribution system. The average age of utility field crew workers has increased and is at a point where there will likely be higher than normal retirement rates in the next few years. There remains an unfulfilled need to capture and transfer critical skills and knowledge, some of which are undocumented and subject to loss upon the retirements of knowledgeable individuals. Presently, there are insufficient numbers of new workers being hired and trained to be able to adequately repair and maintain the electric transmission and distribution system in New York. Therefore, the Local Unions also recommend that SBC funds should also be used to address this deficiency through the establishment of training programs, apprenticeships, internships and formal school recruitment programs. This would help to enhance and sustain a critical knowledge base and a proactive and supportive work culture. If SBC funds are not assigned to alleviating this problem, the problem will fester and the electricity consuming public will suffer as a result.

## Conclusion

For the all of the reasons cited above, the Local Unions recommend that the Commission (1) approve continued funding of the SBC program for an additional five years; (2) establish priority for projects that do the most to improve safety and reliability of electric transmission and distribution system in New York; (3) extend the use of SBC funds to research and development of the State's transmission and distribution energy resources of manpower, distribution infrastructure, and transmission capability and capacity; and, (4) extend SBC funding for training (including apprenticeships, internships and formal school recruitment programs) necessary for electric utility workers to use the latest technologies to maintain safety, reliability and efficiency of the electric grid.

The Local Unions appreciate their opportunity to comment on the important issues included in the Staff Proposal in this proceeding.

Dated: October 14, 2005  
Ridgefield, Connecticut

Respectfully Submitted,

/s/ Richard J. Koda

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To: Honorable Jaclyn A. Brillling, Secretary  
cc: Parties in Case 05-M-0090 electronically via NY PSC list-server.  
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