



October 12, 2005

Honorable Jaclyn A. Brillig
Secretary
New York State Public Service Commission
Three Empire State Plaza
Albany, New York 12223

RE: NEW YORK STATE PUBLIC SERVICE COMMISSION CASE 05-M-0090 – IN THE MATTER OF THE SYSTEMS BENEFIT CHARGE III: STAFF PROPOSAL FOR THE EXTENSION OF THE SYSTEM BENEFITS CHARGE (SBC) AND THE SBC-FUNDED PUBLIC BENEFIT PROGRAMS

ICF Consulting is pleased to submit these additional comments in response to the above referenced Staff document dated August 30, 2005. We applaud the proposal developed by the Department of Public Service Staff to extend Systems Benefit Charge-funded public benefit programs for an additional five years. As we noted in our March response to the DPS's call for comments, we strongly support the continuation of the SBC in New York. Further, we believe that NYSERDA has done an outstanding job in designing and implementing a cost effective suite of programs for New York ratepayers impacted by the SBC. We are gratified that Staff has come to same conclusion as we have.

Proving the volatility in the domestic and international energy supply situation, much has changed since our March response. Crude oil prices began a roll-up during the 2nd and 3rd Quarters, exacerbated by the impact of the two hurricanes on major domestic crude oil production and refining centers. With oil prices at record levels, and natural gas prices expected to follow the same increasing trend, the call to use energy wisely has been echoed by the federal government as well.

NYSERDA, as implementer of these public benefit programs, has proven to be an effective agency in its work related to more rational use of electricity. Now, with the Staff's proposal to extend their mandate to include natural gas, this Authority can use their expertise to make a significant impact on the use of this natural resource as well. We hope that the Commission will approve and implement the findings of the Staff's investigation, continuing SBC for an additional five years.

Thank you again for this opportunity to comment on the Systems Benefit Charge.

Sincerely,

A handwritten signature in black ink, appearing to read "Michael E. Mernick".

Michael E. Mernick
Senior Vice President