



# Independent Power Producers of New York, Inc.

Gavin J. Donohue  
*President & CEO*

19 Dove Street  
Suite 302  
Albany, New York 12210

Tel: (518) 436-3749  
Fax: (518) 436-0369  
www.ippny.org

October 17, 2005

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

Re: **Case 05-M-0090 - In the Matter of the System Benefits Charge (SBC) III**

Via hand delivery and via email to [secretary@dps.state.ny.us](mailto:secretary@dps.state.ny.us) and [sbc@dps.state.ny.us](mailto:sbc@dps.state.ny.us)

Dear Secretary Brillling:

The Independent Power Producers of New York, Inc. (IPPNY) is an Albany-based trade association, which represents the competitive power supply industry in New York State, including companies involved in the development of electric generating facilities; the generation, sale, and marketing of electric power; and the development of natural gas facilities. IPPNY Members generate almost 75 percent of New York's electricity using a wide variety of generating technologies and fuels including hydro, nuclear, wind, coal, natural gas and biomass. IPPNY submits the following comments in relation to the above-referenced proceeding.

IPPNY supports the recommendation of the Staff of the Department of Public Service that the New York State Public Service Commission make a determination regarding the potential expansion of the SBC to gas customers after the Gas Statewide Study has been completed and analyzed. IPPNY also supports the August 31, 2005 Notice's statement that whether the SBC should be expanded to include programs for these customers will be considered in a separate proceeding, after the data from this study is available.

In addition, if an SBC III program is authorized, the Public Awareness and Education Program should be continued at levels needed to inform the general population about energy issues. This program is consistent with the goals for the SBC III program, as proposed by the Staff of the Department of Public Service, especially in the areas of improving New York's energy system reliability and security, enabling fuel diversity, fostering competition, and helping meet future energy needs.

Thank you for taking the time to consider and address these comments.

Sincerely,

Gavin J. Donohue  
President & CEO