

*Margert Community Corporation*



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 SBC III*

**Comments**

Submitted by: Joseph G. Barden, Executive Director  
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Margert Community Corporation is an independent, nonprofit, charitable, community-based housing organization that provides neighborhood preservation services, housing assistance, energy affordability analyses and retrofits, health & safety improvements, client education and housing counseling to low and moderate income tenants and homeowners, the elderly and persons with disabilities. While our primary service area is Far Rockaway, Queens, we also provide vital housing services to all of Queens County and the entire NYC Metro Area. These services are provided by leveraging a variety of public and private funds primarily designed to assist households at or below 90% of our area's medium income, and/or in severe financial distress. These resources, leveraged through the core administrative budget provided by the NYS DHCR Neighborhood Preservation Program, include the DHCR Energy Services Bureau Weatherization Assistance Program (WAP), the NYS DHCR HOME Program (LPA), the NYS DHCR/HTFC RESTORE Program (LPA), the US Department of Housing and Urban Development (HUD) Comprehensive Housing Counseling Program (CHC), the NYC DFTA Last Resort and coordinated weatherization programs (e.g., WRAP), the Long Island Fuel Fund's Project Warmth, NYC Housing Authority Homeownership Initiatives, the NYC HPD Protect Assets and Community Equity (PACE) program and new construction through the NYS DHCR Unified Funding Process and the NYC Housing Partnership/HPD Edgemere Urban Renewal Plan. Margert also provides assistance, when funding is available, through the state legislature's Urban Homeownership Assistance Program (UHAP). This program has allowed the agency to provide a more comprehensive level of homebuyer education and assistance targeted to the Rockaways, and professional staff hours to combat predatory lending and fraudulent mortgage practices, especially within the traditionally under served communities of the NYC Metro Area. Margert is a member of the New York Mortgage Coalition, and is an approved housing counseling agency for NYCHA and NYC HPD. We also partner with LIPA to administer its Residential Energy Affordability Program (REAP) in the

Rockaways, and serve as Local Case Manager (LCM) for NYSERDA's Assisted Multi-Family Program (AMP) and Weatherization Network Initiative (WNI), through which we provide additional energy conservation measures to publicly assisted multi-family buildings, and previously weatherized small homes which never received the full benefit of electrical DSM reduction measures.

As the subgrantee responsible for administering the New York State DHCR Energy Services Bureau (“the Division”) **Weatherization Assistance Program** (WAP) in south Queens, we appreciate the opportunity to provide comments on the staff proposal regarding SBC III.

We believe that the important public service provided to New Yorkers by the Public Service Commission in adopting and continuing the SBC program through SBC I and II simply cannot be underestimated, and strongly support the continuation of public benefit program funding through an **SBC III**.

For over twenty years, we have provided energy efficiency services to low-income households in both small homes and multifamily buildings through the Federal Weatherization Assistance Program. During that time, we have witnessed remarkable growth in the both the effectiveness and professionalism of the delivery of weatherization services to vulnerable, low-income households living in inefficient, costly and often unsafe or unhealthy housing. The engine driving this growth has always been the dedication and commitment of local agencies, fueled by the vision, determination and willingness of our state counterparts, to provide the absolute best level of service possible. In recent years, this standard of service has been enhanced greatly with the addition of Systems Benefit Charge (SBC) programs, and the coordination of these programs with WAP.

Since 1999, we have been able to participate in several NYSERDA-funded programs made possible by the Public Service Commission’s System Benefits Charge. Under the coordinated project model developed first under NYSERDA’s Direct Install program, we have been successful in providing a more comprehensive scope of services and to do so in more low-income housing units in our community. This coordination of federal dollars with State funds has resulted in leveraging more resources to address the growing needs of low-income households in a time of rapidly increasing household energy prices.

We respectfully offer the following specific recommendations for your consideration in reviewing the staff proposal regarding SBC III:

1. **Increase Funding Share for Low Income Programs**

An increased share of SBC funds should be allocated for low-income programs, including those targeting low-income residents in multifamily buildings where heat is included in the rent but tenants pay directly for their electric utility bills (direct metered customers).

## 2. Expand Definition of Energy Burden to Include “Rent plus Utility” Burden

In developing low-income programs, we recommend that a broader definition of “energy burden” be used to recognize that when heat is included in the rent (as it is in most rental properties in NYC), the rising cost of oil and natural gas puts an upward pressure on rent that results in a much higher “household rent plus utilities” burden.

## 3. Provide Greater Funding for Residential Sector, Including Multifamily Buildings

Address the undercounting of the need and opportunity in multifamily buildings where the common area account is identified as either a small or large commercial service classification but the electric service provides public hallway and other common area lighting and electricity.

## 4. Continued Coordinated Programming with the Weatherization Program

In low-income programs, continue to utilize and build the capacity of the existing statewide network of local community based organizations and community action agencies funded by the Federal Department of Energy’s Weatherization Assistance Program and the Low Income Home Energy Assistance Program, taking full advantage of leveraging and program coordination opportunities. Specific NYSERDA SBC programs such as the Direct Install program, the CBO Initiative and the Empower program have each adopted this approach; and should be expanded under SBC III.

## 5. Training and Certification

Continue and expand SBC support for the development of a broad based, statewide **training** and certification infrastructure, including training for building performance contractors, weatherization field staff, building superintendents, property managers, heating system designers and installers and a variety of new job classifications relevant in the changing energy industry.

## 6. Advanced Metering and New Information and Controls Technology

Expand on existing NYSERDA initiatives providing targeted support for development of an **advanced metering** infrastructure in the mass residential market, including apartments in multifamily buildings as well as in small homes, in order to provide the information, technology and controls enabling effective implementation of time sensitive rates, and promoting energy efficiency and load management.

## 7. Continued Support for Energy Efficiency Resource Acquisition Programs

We support continued market transformation approach but recognize the continued need for resource acquisition strategies and incentives to address the market barriers, particularly in the split incentive environment of multifamily buildings where building owners often pay only for common area energy use while tenants are directly and individually metered for their electric use. Incentives sufficient to overcome such

barriers are still needed. We also recommend a balanced approach that continues greater focus on energy efficiency, while incorporating demand reduction strategies.

Thank you for the opportunity to share these recommendations for your review; we hope they are considered favorably.



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Executive Director  
10/14/2005