

**Submitted by: Northern Manhattan Improvement Corp
76 Wadsworth Ave NY, NY 10033**

October 14th 2005

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

Thank you for the opportunity to provide comments on the staff proposal regarding SBC III. We acknowledge the important public service that the Public Service Commission provided to New Yorkers by adopting and continuing the SBC program through SBC I and II and strongly support the continuation of public benefit program funding through an SBC III.

Our agency is a non-profit community-based organization that provides a range of services to low-income neighborhoods we serve in New York City. Please see enclosed.

For more than 24 years, we have provided energy efficiency services to low-income households in both small homes and multifamily buildings through the Federal Weatherization Assistance Program (a total of over 11,000 units in over 350 buildings).

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 have the following specific recommendations for your consideration in reviewing the staff proposal regarding SBC III :

- **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).
- **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.
- **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.
- **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.
- **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.

- **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.

- **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.

Sincerely,

Dan Rieber, Weatherization Director, NMIC