

October 14, 2005

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

Dear Ms. Brillling,

Northfield Community Local Development Corporation of Staten Island, Inc. appreciates the opportunity to respond to the PSC's request for comments. It is of particular interest to the LDC as we are well-aware of the ever-rising cost of home heating and cooling costs. This winter, as our clients face 40% plus increases in their heating costs, we are delighted to be able to provide them with some answers through SBS programs such as Home Performance with Energy Star and WNI (Weatherization Network Initiative) together with our Weatherization Assistance Program.

To tell you a little about ourselves, Northfield Community Local Development Corporation was founded in 1978 by the merchants, property owners and residents of Port Richmond, Staten Island for the purpose of community improvement and advocacy. Our mission is to take a holistic approach to community development and improve the quality of life within Port Richmond, the North Shore and Staten Island as a whole through the development and upgrading of affordable housing, creation of economic development opportunities, weatherization and energy conservation and cultural and educational programming.

***We have been a subgrantee of the Weatherization Assistance Program since 1983 and appreciate the fact that Weatherization subgrantees have been part of NYSERDA'S initial strategy regarding Home Performance and have been able to participate in SBC Programs. Of course, we would like to see the continuation and expansion of coordinated programming with the Weatherization Assistance Program.*** Because of the SBC Programs initiated in 2001, we have been able to offer our low income clients so much more in the area of reducing energy consumption, such as refrigerator replacement, appliance controls, energy efficient hardwired lighting, home performance and assisted home performance options.

Recently, we became a Home Performance with Energy Star contractor and this enables Northfield to expand services to **all** Staten Islanders, regardless of income. We use the latest in technology to address the performance of homes with respect to health, safety and energy efficiency issues. Home Performance with Energy Star is an SBC program that allows us to provide grants and low interest loans to those Staten Islanders at or below 80% of the median. For those over the 80% median, through the Home Performance with Energy Star program we can provide a 10% Homeowner Financing Incentive up to \$2,000.

Our first Home Performance client stated in a letter to NYSERDA, “*My reason for writing is to let you know what reliable and efficient company they are! It’s nice to know that there are still contractors out there whom you can trust to show up when they say will, and complete the work in a timely manner. Also, WITH manners, I might add. Jim Reilly’s crew was so pleasant to be around that I didn’t even mind having them in my house for 3 weeks!*”

We, literally, have hundreds of such letters in our files that we received over the 20 + years of providing weatherization services to the Staten Island community.

The Public Service Commission’s Notice takes into account 14 questions and we will address a few pertinent ones. In response to case 05-M-0090 – In the Matter of the System Benefits Charge III, we would like to comment on the following.

**The SBC Program should be extended beyond the 5 year period.** We believe that extending the time period by at least 2 more years, for a total of 7, would assure for more long term benefits. Once the program experiences a longer extension period, consumers would see at least a full five-year cycle of activity under the program, as there would be no curtailment prior to the commission’s decision. Committed continuity, in our mind, is necessary for success.

**Continued coordination with the Weatherization Assistance Program:** As stated above, Northfield Community LDC would like to see the continuation and expansion of coordinated programming with the Weatherization Assistance Program. Under SBC I and II low-income programs benefited by utilizing and building the capacity of the existing statewide network. Building on this success, the approach should be expanded under SBC III.

**The extension of the SBC should include programs for gas customers.** It was noted in the “Notice Regarding Service of Comments” issued October 13, 2005, that the PSC will be conducting a study regarding an adjustment to the scope of SBS programs to include programs for gas customers. It further stated that a decision will be made after more information is in hand. We will also wait for the results of this study before making comment.

**SBC revenues should be enhanced by the reestablishment of full funding from electricity sales:** Since the current funding level for SBS was set in July 2001 at \$150 million, inflation has already reduced this amount by a substantial amount (approximately \$137.5 million). It seems quite clear that SBC future funding levels must exceed the initial 2001 amount if SBC is to continue and be meaningful. Therefore, we suggest the extended SBS funding level should be increased to at least \$200 million.

**The presentation of SBS charges on customer bills should be revised.** We advocate that efforts to educate the consumer regarding the itemization of the SBS surcharge on their bills be a priority. Customers deserve to know where their money is going and what it is doing. Customer bills should clearly indicate the benefits derived from the SBC program.

**Program revenues should be distributed to programs for residential customers in proportion to the share of electric revenues paid by residential customers.** We recommend that an appropriate distribution of SBC funding to programs associated with benefits to the residential customer be consistent with the percentage residential customers pay, which is approximately 44%. Further, we request that great attention be given to assure this is happening.

**Training:** Staff of both Northfield Community LDC and Northfield Neighborhood Performance, Inc. has derived great benefit from training and certification under past SBC programs. The continuation and expansion of SBC statewide training and certification is of utmost importance. We believe this training should include training for building performance contractors, weatherization field staff, building superintendents, property managers, heating system installers, etc. As the energy field changes, new classifications should be included.

In conclusion, we would like to commend the Public Service Commission and NYSERDA for their accomplishments on behalf of the Staten Island community. We most certainly advocate for the continuation of the programs now in place and would also like to see new initiatives and products developed in the future.

Warmest regards,

Joan Catalano  
Executive Director