



# P.E.A.C.E., Inc.

People's Equal Action and Community Effort, Inc.  
217 South Salina Street • 2nd Floor • Syracuse, NY 13202  
Phone (315) 470-3300 • Fax (315) 472-8939  
www.peace-caa.org

Joseph E. O'Hara, Executive Director

811 East Washington Street, Syracuse, W 13210

October 12, 2005

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

Re: **SBC3**-Testimony

Dear Ms. Brillling:

■ am the local case manager for **NYSERDA's** AMP program in **Central** New York ■ am responding on behalf of myself and Ray Yehle, the Director of the Department of Energy and Housing at P.E.A.C.E., Inc. We firmly support the Public Service Commission Staff Proposal for the Extension of the System benefits Charge (SBC) and the **SBC-Funded** Public Benefit Programs.

Our work has given us insight into the needs of buildings and their residents from the state's theoretical prospective as well as the day to day practical realities of low income people contending with sky rocketing fuel costs.

Morally, SBC must be extended to provide relief to low **income** individuals and their families. The low income population is the hardest hit when the cost of fuel increases. Families with limited resources **are** confronted daily with difficult choices between fuel, food and rent

*"Helping People in The Community Realize Their Potential For Becoming Self-Sufficient"*

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among the other expenses they must meet in order to survive. No family should be forced to face the discomfort and hardship of inadequate warmth or power. As the supply of fossil fuel is depleted, higher costs can certainly be anticipated. Measures must be taken to reduce our energy consumption needs. The poor population will not be able to afford the increased costs and will be forced to face greater hardship.

The work of **SBC1 & SBC2** has made a deep impact on the quality of life for low income families in the State of New York. However, there are many more housing accommodations that have yet to benefit from the **programs**. The extension of the SBC funding will enable local case managers to reach out to many more owners. As winter nears, and the media highlights the predictions of higher fuel costs, more owners will want to take advantage of the programs. The extension of the **SBC** funding will assure that assistance, both technical **and** financial, will be available for owners to improve their properties. This will result in reduced **utility** costs for a greater number of low income **individuals** served by the program while moving closer to the state's goal of reducing energy consumption statewide.

**SBC3** should be extended for ten years. Staffing up to meet the goals of the program could be more confidently achieved with a longer period of funding in place. Upgrading the energy efficiency of our housing stock and business properties requires the employ of highly knowledgeable and technologically proficient professionals. A ten year extension of the program will promote the hiring of the highest quality of professional staff to achieve the goals of the NYSERDA programs. A ten year extension will allow businesses engaged in energy **and** housing to attract more professionals to join their teams by offering longer term job security.

The annual SBC3 budget should be increased to **\$250,000,000**. We are in the midst of a serious energy crisis. Our dependence on foreign fuel has put our county at the mercy of unfriendly nations. An increase in the annual budget would allow for the hiring of more of those same professional people to more quickly achieve the state's goals. Additionally, the increased budget would allow benefits to be extended

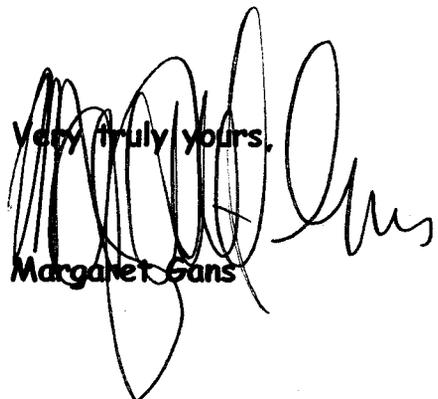
to a greater number of **projects** within the same time period. It is in the state's best interest to reduce our energy needs and dependence on **foreign** fuel as soon as **feasibly** possible. The costs associated with our dependence on foreign fuel is greater than the amount needed to reduce that *same* dependency. Every effort must be made in **terms** of time devoted, resources allocated and money earmarked to achieve of goal of fuel independence.

**SBC3** should be enacted to provide resources for the research and development of "green" solutions to our energy needs. Money must be made available to encourage the development and implementation of new technology to replace fuel **guzzling** equipment.

**SBC3** should move forward to provide funding to assure the public is educated on every measure they can personally incorporate into **their** daily routines to reduce their individual energy requirements. Knowledge is 'powerful.'

Very truly yours,

Margaret Gans





# PEACE, Inc.

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Phone (315) 470-3300 • Fax (315) 472-8939  
[www.peace-caa.org](http://www.peace-caa.org)

Joseph E. O'Hara, Executive Director

Energy & Housing Services

October 11, 2005

Jaclyn A. Brillling,  
Secretary, New York State PSC  
3 Empire State Plaza,  
Albany, New York 12223-1350

Dear Secretary Brillling:

Attached are comments on the Public Service Commission "**Staff proposal** for the extension of the System **Benefits Charge (SBC)** and the SBC-~~jknded~~ Public Benefit Programs." Case 05-M-0090 In the Matter of the System Benefits Charge III. **These** observations are based on PEACE Inc.'s Energy & Housing Services programs' experience with law-income consumers' residential single and **multi-family** energy issues.

We are pleased that the **staff proposal** advocates for the extension of the SBC programs, albeit for **only an additional five** years. It is our suggestion that the programs be extended for a longer period of time, possibly ten years. **This** would promote greater **confidence** in both the public and private sector to develop the **infrastructure** and **capacity** to deliver energy **efficiency** services.

**The** current crisis in energy **costs further** documents the **need for** delivering assistance to law income families residing in the least **efficient** housing stock. **This** segment of the state population, which presently pays a disproportionate percentage of income for basic home heating needs, will be impacted to the greatest degree by the increased costs. Residents who have been barely making ends meet will now be forced into choosing between basic human needs.

Given these facts we would recommend that the Commission reconsider **the funding** levels for SBC III and raise them to \$250,000,000. In addition, we ask that the Commission examine the percentage of SBC **funding** levels divided between commercial and residential customers. Residential and low-income customers **presently** receive a disproportionate share of **revenues**. **These** customers should, at the very least, receive the percentage **of funding** at the same percentage as they subsidize the programs through charges on their utility bills. A **50-50** split between commercial and residential would be fair and a separate **fund** for low-income customers should be established **apart from** the 50-50 split.

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Based on the **current** crisis we feel the percentage of revenues expended on R&D should be lowered and those funds utilized for delivering energy **efficiency**. **Making energy efficiency** protocols and measures available to both residential and commercial customers is a proven method of both reducing demand and assisting customers with **the** high cost of energy. At this point in time we should be maximizing our resources to deliver these proven **methods**.

Not included in the **staff recommendations** is **formation** of a natural gas SBC. We understand that there have been some preliminary discussions concerning a gas SBC and want to go on record in support of any **additional** revenue to support low-income **energy** reduction programs. A gas program could greatly expand the scope of services currently delivered under the electric reduction programs.

In conclusion we would like to **applaud** the PSC for supporting, **and NYSERDA** for advancing, what we feel are **good** public policy **goals** in regards to the competitive electric **market** in New York State through the **SBC programs**. As advocates for low-income residents we encourage your continued support of initiatives that can lessen the burden of high-energy costs on the segment of our citizens that already expend a disproportionate percentage of their resources on energy needs and who are most vulnerable to the **current** energy crisis.

Sincerely,

Ray Yehle,  
Director, PEACE Inc. Energy & Housing Services  
**Ex-Officio**, New York State Weatherization Directors Association