

COMFORT

HEALTH

ENERGY EFFICIENCY

Performance Systems Contracting INC.



October 14, 2005

*Building Performance*

*Green Building*

*Indoor Air Quality*

*Diagnostic Testing*

*Heating*

*Air Conditioning*

*Ventilation*

*Insulation*

*Air Sealing*

*Solar*

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

RE: Staff Proposal for The Extension of the System Benefits Charge (SBC) and SBC  
Funded Pubic Benefit Programs

Dear Secretary Brillng,

Thank you for this opportunity to comment on the System Benefit Charge programs. NYSERDA's programs have set the pace for public funding of energy efficiency nationally by creating market based programs that focus on meeting the needs of home and business owners while simultaneously providing public benefit. Since NYSERDA programs are market based, especially the residential sector programs, these programs have also been effective in job creation. Our company has grown from a staff of two in 1999, to over 30 employees in 2005. This market based approach needs to continue.

Another aspect of the NYSERDA programs that helps the market is the consistency of program design and incentive delivery. This is another area where NYSERDA has assisted the market development. The basic nature of the incentives has been consistent, and the long term funding provided the SBC has also helped our business to make investments in growth. Five years is the minimum to provide businesses with the incentive to invest in development. A longer term would drive more investment by businesses that support the delivery of energy efficiency services. States that have dealt with annual redesign of programs have seen their energy efficiency infrastructure suffer.

In total dollars it may look like New York is making a major investment in efficiency, but in terms of energy expenses and per capita criteria other states are increasing their level of investment relative to New York in response to both concerns about cost and supply. New York is beginning to lag behind other states. Higher funding for efficiency and renewables would be a benefit to both ratepayers and to New York State's businesses. New York is an energy importer. Retaining saved energy dollars in the State's economy is good for everyone in New York.



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The New York Assisted Home Performance program has been a particular benefit to low and middle income homeowners and renters. This innovative program has provided key funding for the improvement of the State's affordable housing and has helped reduce energy costs and improve the safety of homeowners. Since these houses have often not been well maintained, we frequently find problems with combustion and venting. A study of the impacts of this program would be sure to find that lives have been saved and homeownership maintained in the face of climbing energy bills.

We look forward to helping New Yorkers reduce their energy bills and improve their building performance with the support of the next round of SBC funding.

Sincerely,

A handwritten signature in cursive script that reads "Greg Thomas". The signature is written in black ink and is positioned above the printed name and title.

Gregory Thomas  
President