



October 17, 2005

Ms. 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 that we serve in Kings County in New York City. For more than 36 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 the past seven (7) years we have expended about \$6.4 million on weatherization work.

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.

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

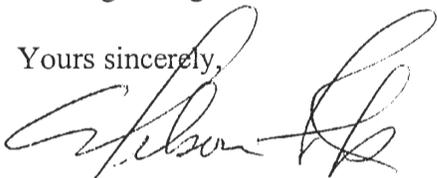
In low-income programs, continue to utilize and build the capacity of the existing statewide network of local community based organizations and community action agencies funded by the Federal Department of Energy’s Weatherization Assistance Program and the Low Income Home Energy Assistance Program, taking 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.

We thank you for taking the time to consider our comments and trust that they would be helpful in your reaching a decision to support the continuation of public benefit program funding through an SBC III.

Yours sincerely,



Nelson Ramos
Executive Director