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# TRC

Customer-Focused Solutions

October 11, 2005

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

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RE: Case 05 – M – 0090

Dear Secretary Brillling:

TRC Companies, Inc. welcomes this opportunity to respond to the August 31, 2005, Staff Proposal regarding the extension of the System Benefits Charge (SBC).

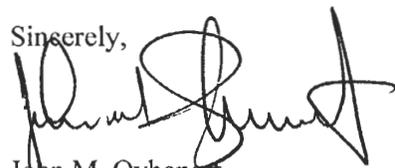
TRC is a publicly-traded engineering and environmental services firm with 96 offices and 2,400 staff throughout the United States. In New York, we are a registered engineering firm with 7 offices and a staff of 236. TRC is a technical consultant and implementation contractor to NYSERDA for four SBC-funded programs: Residential Comprehensive Energy Management, Energy Smart Schools, Commercial/Industrial Performance, and Energy Smart Energy Auditing.

We applaud the Staff's well-reasoned proposal to extend the SBC program for an additional five years. This continuity allows the programs to fully capitalize on the market momentum generated over the last eight years and continue to achieve the highest level of energy savings and environmental benefits per public benefit dollar invested. Further, we believe the Staff correctly identified the synergistic benefits of combining programs, such as the several multi-family programs and the plethora of technology programs for businesses, so that a one-stop-shopping opportunity is provided to customers for energy efficiency benefits. This is the best way of ensuring that owners take a holistic approach to energy efficiency upgrades and reap the overlapping energy savings benefits.

One note we wish to make, however, is that it appears that the program evaluation process sometimes is not flexible enough to account for the value of a program outside certain paradigms about direct energy savings. We believe that the evaluation process could be improved if evaluators better understood the benefits of each program with respect to additional factors that are important to energy competition in New York State. For example, in the Comprehensive Energy Management Program we have found that, in addition to reducing electricity use in multi-family buildings, the installation of advanced metering enables these buildings to take advantage of new rate structures under competition. However, we are not sure that these benefits are fully understood and accounted for by the evaluators and therefore we fear that some important benefits of this program are being understated.

We strongly urge the Commission to adopt the Staff Proposal. Thank you for this opportunity to express our views.

Sincerely,



John M. Oyhenart  
Associate Vice President