



IDT Energy, Inc.
520 Broad Street
Newark, New Jersey 07102

July 25, 2007

VIA EMAIL

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

Re: **IDT Energy, Inc.**
Case 07-M-0548 – Energy Efficiency Portfolio Standard
Response to ALJ Stein’s Questions

Dear Secretary Brillling:

I am providing below answers to Judge Stein’s questions, dated June 22, 2007. Please note that we are responding only to questions 6 – 9 directed to “all parties.”

6. What entities would be most appropriate and effective in delivering:
- (a) market transformation type programs
 - (b) peak shaving/demand response type programs
 - (c) end-user rebate type programs
 - (d) energy audit type programs
 - (e) weatherization type programs
 - (f) programs for participants lacking capital
 - (g) programs targeted to new construction
 - (h) programs targeted to existing building stock, appliances and fixtures

Answer: Appropriate entities should include energy services companies (“ESCOs”). ESCOs provide competitive supply service to nearly 1.3 million of New York State’s natural gas and electric consumers. Competitive markets currently focus not only on supplying energy, but also consider value-added services related to energy efficiency and management as an integral part of the long-term energy solution for consumers. Competitive markets provide a means to present efficiency choices to consumers rather than the compliance-driven offerings consumers usually are presented with. ESCOs are principal competitive suppliers in the market, and as such, their participation is critical to the success of all of these types of programs.

7. What entities would be least appropriate and effective in delivering:

- (i) market transformation type programs
- (j) peak shaving/demand response type programs
- (k) end-user rebate type programs
- (l) energy audit type programs
- (m) weatherization type programs
- (n) programs for participants lacking capital
- (o) programs targeted to new construction
- (p) programs targeted to existing building stock, appliances and fixtures

Answer: Entities least effective would be those offerings efficiency programs as a matter of compliance. Efficiency programs need incentives at multiple levels. Incentives at the consumer level may be in the form of tax, purchased equipment rebates or assistance in financing projects. Incentives for those entities delivering these programs are financial in nature. Competitive markets, not regulatory directives, are best suited to drive innovative programs.

8. Is your entity or organization interested in being a provider of energy efficiency programs? If so, what types?

Answer: Yes. All types that give the consumer added value and choice

9. Is your entity or organization opposed to being a provider of energy efficiency programs? If so, what types?

Answer: No

Respectfully submitted,

IDT ENERGY, INC.

By: 

Andrew Fisher
Senior Regulatory Counsel

/s/
Wayne Stoughton
Vice President – Sales and Customer
Service