

**STATE OF NEW YORK
PUBLIC SERVICE COMMISSION**

**Proceeding on Motion of the
Commission Regarding an
Energy Efficiency Portfolio
Standard**

Case 07-M-0548

**RESPONSE OF PUBLIC ENERGY SOLUTIONS, LLC TO ADMINISTRATIVE
LAW JUDGE ELEANOR STEIN'S QUESTIONS TO ALL PARTIES**

Public Energy Solutions, LLC (PES) hereby submits its responses to the ALJ's June 22, 2007 questions to all Parties.

1. Can you please identify any inventories in New York State of existing building stock, appliances and fixtures that might be used to identify and target efficiency opportunities?

PES is unaware of any inventories of existing building stock specific to the state of New York. The Energy Information Agency maintains databases of typical appliance and fixtures configurations by building use type which might provide some insight into consumption amounts and patterns.

2. Can you please identify any specific methods used in this or other jurisdictions of creating inventories of existing building stock, appliances and fixtures that might be used to identify and target efficiency opportunities?

In the late 1980's Massachusetts used an "opt in" approach to having customers complete building surveys as a method of delivering information to ESCO's interested in serving the Massachusetts market. It was found by the ESCO's to be of some value in preparing their businesses for operations in the Commonwealth.

3. Can you please identify any specific energy efficiency programs targeted to existing building stock, appliances and fixtures rather than to new construction? If possible, provide a description, cost per MWh or Decatherm, and total resource cost test score for each such program.

One program offered by Consolidated Edison, the Targeted Load Reduction program is ongoing and focused on existing building stock. ConEd has reported on the costs of the program.

4. Can you please identify any specific energy efficiency programs targeted to participants lacking available capital to invest in energy efficiency measures? If possible, provide a description, cost per MWh or Decatherm, and total resource cost test score for each such program.

PES operates its programs under the Targeted Load Reduction program of ConEd. PES targets the mid and small commercial customers and high density residential customers who have as a characteristic, low access to capital. PES is not aware of the TRC for this program.

5. Are you aware of any specific market transformation energy efficiency programs that are not already being pursued in New York? If possible, please provide a description, cost per MWh or Decatherm, and total resource cost test score for each such program.

PES is not aware of such programs but is not representing that there are none.

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

PES believes that the ratepayers and the State should and can demand that all programs be implemented on a performance basis and as such do not believe that there is a place for rebate programs moving forward. All other forms of programs can be delivered by any party willing party to assume acquisition, performance and persistence obligations, which parties could include ESCO's, contractors, utilities and authorities.

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

PES believes that the ratepayers and the State should and can demand that all programs be implemented on a performance basis and as such do not believe that there is a place for rebate programs moving forward. All other forms of programs can be delivered by any party willing party to assume acquisition, performance and persistence obligations,

which parties could include ESCO's, contractors, utilities and authorities. As such, any party unwilling or unable to assume, acquisition, performance and persistence obligations should not deliver energy efficiency programs.

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

Yes. A,B,E,F,H

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