Honorable Members of the Public Service Commission: I am a resident of Island House and given the deterioration of the building's systems, and the fact that the owner has not made the necessary repairs or done the upgrades that would have been necessary to ensure that the building is energy-efficient, instead the landlord wishes to shift the cost of the repairs and the cost of heat - by means of 40 year-old old/broken/ineffective baseboard heating units, in the setting of a building which has never had its windows upgraded in 40 years, moreover none of the appliances are Energy-Star appliances, including the building-supplied air conditioning units, I entreat the Public Service Commission to deny the owner's petition to sub meter, as the sole intent of his action is to shift the heating cost and his not having made the needed repairs to those who will purchase their units in the cooperative conversion by means of sky-high maintenance and assessments and the "fleecing" electrical surcharge based on the number of shares each cooperator will purchase although their maintenance already will pay for the electric bill along with rents, as well as to those who will remain as rental tenants - already facing a future filled with danger and risks as the landlord will seek any way to remove the rent-regulated tenants in order to sell their units at market price - how very "convenient" to make the moderate-income Mitchell-Lama tenants leave their units by levying huge electrical charges on them, charges they will never be able to afford, huge because the landlord never made the upgrades he was supposed to have made for over 20 years! The building in short is a sieve. The baseboard heating units are antiquated and lack thermostats; even if left on day and night, the units are still cold in the winter. Likewise, tenants suffer in the heat of summer - because the insulation in the exterior walls long ago crumbled to dust and was never replaced by the owner, just as the windows were never replaced, the baseboard heaters were never replaced, and the appliances were never upgraded to Energy Star appliances. By pushing a coop conversion, the landlord, who is putting only a fraction of the cost of the needed repairs into the reserve fund, hopes to shift the cost of repairs to the cooperators, just as he hopes to shift the cost of heat to the tenants by means of sub metering. It is both illogical, unreasonable, unjust and unfair to "punish" the moderate-income tenancy by allowing sub metering under these circumstances: The tenancy will "pay" and will likely "move out" if the landlord's request to sub meter is granted - given the astronomical cost of electrically heating the units by means of the antiquated, inadequate, inefficient baseboard heaters. And as each Mitchell-Lama tenant leaves their apartment, yet another affordable apartment in NYC will be lost, as the apartments will become impossible to afford for the population for which they were built - the moderate-income tenants - if sub metering is allowed given the above-described circumstances. At the very least, as long as the building throughout is leaking heat in the winter and coolness in the summer - it should not be allowed to sub meter, and the landlord should continue to pay the electrical bill out of the proceeds of the rent, which he has done since 1975, with no financial problem to him. He is requesting sub metering now, under the "guise" of "energy conservation" so as to shift the cost of heat to the tenants, so as to improve his profits. On a long term basis, sub metering can only "make sense" if the needed energy-efficiency/system upgrades are first implemented: Windows, appliances, baseboard heaters, and insulation would all have to be replaced in order to make the building energy efficient.

Sub metering without the upgrades is like putting "lipstick on a pig" - making a wasteful building "seem" energy-efficient, although it is not. Thank you, Helen Chirivas