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March 2, 2005

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

Re: CASE 05-M-0090 – In the Matter of the System Benefits Charge III

#### **Response to Notice Soliciting Comments**

OCM-BOCES (Onondaga-Cortland-Madison Board of Cooperative Education Services) is a regional vocational education provider under the aegis of the New York State Department of Education. We have worked in partnership with NYSEDA over the last five years to deliver Building Performance Training related to Home Performance with Energy Star and Energy Star Labeled Homes Programs. We respectfully offer the following comments related to the continuance of the New York Energy Smart Programs funded by the Systems Benefits Charge.

**1. To what extent have the goals and objectives established by the Commission been achieved?**

From a general perspective, the goals of the SBC program, as articulated in the 1998 Plan, are being met, as is documented in the most recent evaluation of the New York Energy Smart Programs. The programs we are most familiar with, Home Performance with Energy Star and Energy Star Labeled Homes, have been extremely successful in meeting their goals of essentially transforming the markets they have targeted. Under our Building Performance Training program, we offer comprehensive training on the Building Performance Institute standards to provide architects, engineers, contractors, builders, and energy raters with the knowledge and skills to improve the health, comfort, safety, durability, and energy efficiency of new and existing homes. OCM BOCES offers six different in-depth Building Performance training courses which last from three to six days, and include both classroom and field training. Thus far, we have issued over 500 training participation certificates to a wide variety of practitioners statewide. Our state-of-the-art training programs are currently being replicated across the nation.

**2. Should the SBC program continue beyond its current expiration date of June 30, 2006? If so, for what duration should the SBC be extended and at what funding level?**

Yes, SBC should be continued for a minimum of five additional years, but preferably longer, in order to assure that full market transformation is allowed to occur. Funding should remain at its current level or higher.

**3. Have conditions changed since the establishment of the SBC that would necessitate a change in the overall goals and objectives of the SBC? If so, what changes are recommended?**

Energy costs have risen and the volatility of energy markets has grown, creating an even greater need for, and public interest in, the types of programs funded by the SBC.

**6. In what ways might the current SBC fund collection and allocation process be improved?**

Recognizing that special allocations need to be made for low-income and R&D programs, to the extent practicable, efforts should be made to assure equity between sector collections and sector allotments.

**7. What specific programs should be eliminated, expanded or created?**

Because OCM BOCES is so committed to the underlying principles of bringing the new field of Building Science and Home Performance to the architects and contractors responsible for building and improving our homes, we strongly support continued funding for the training and certification of practitioners in the private sector. We also support ongoing efforts to reach out to younger students (K – 12), and are particularly interested in incorporating Building Performance training into high school vocational training curricula to assure the next generation of Home Performance experts.

**10. In what ways can NYSERDA improve its administration of the SBC?**

We support NYSERDA as the single administrative entity and value the competence of their performance to date.

**13. Should the scope of the SBC program be expanded to include programs for natural gas customers? (a-e)**

Yes, the SBC program should be expanded to include energy efficiency programs for natural gas customers. Under NYSERDA administration, the existing "House as a System" approach will be able to seamlessly incorporate incentives specific to further reducing gas usage. Funding for these efforts should be *in addition to* the base SBC electric funds. While any decision on a gas SBC should not delay continuance of the electric SBC, it would make sense to align the end dates of both initiatives.

Respectfully submitted,



Paula Hayes

Program Manager

OCM-BOCES Building Performance Training Programs