



# EarthKind

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November 14, 2008

Jaclyn A. Brilling, Secretary  
New York State Public Service Commission  
3 Empire State Plaza  
Albany, NY 12223-1350  
secretary@dps.state.ny.us

Re: CASE 08-E-1007 - *Petition of Consolidated Edison Company of New York, Inc. for Approval of an Energy Efficiency Portfolio Standard (EEPS) "Fast Track" Utility-Administered Electric Energy Efficiency Program.*

Dear Secretary Brilling:

EarthKind Energy hereby submits comments on ConEdison's 60 day filings pursuant to the Commission's June 23rd Order in Case 07-M-0548.

In the Commission Order, Item # 11 states that *"The applicable gas utilities shall within 60 days of the issuance of this Order submit program plans for our approval to implement a residential gas heating, ventilation and air conditioning (HVAC) energy efficiency program in the scope and manner described in this Order and appendices."* (emphasis added)

Appendix 2, Fast Track Program Name: "Residential Efficient Gas Equipment", Program Equipment: *"This program will promote efficient furnaces, boilers, water heaters, clothes washers, solar hot water technology, and hot water conservation measures."* (emphasis added).

EarthKind Energy believes ConEdison responded appropriately to the Commission's directive to include Solar Thermal technologies in its 60 day filing for residential gas customers.

The Commission's June 23<sup>rd</sup> order did not include residential electric programs in the appendix and therefore did not identify technologies for residential electric programs. Solar hot water is a measure that can be applied to preheat the water in any domestic hot water system: Electric, gas, oil, propane. The measure is more cost effective when applied to an electric hot water system due to the higher relative cost of electric compared to the cost of natural gas.

Solar Thermal systems provide the added benefit of reducing kW demand during peak periods. If the order had identified measures for residential electric hot water customers, Solar Thermal was likely to be identified as element of these programs.

In addition to the Residential Gas Program, ConEdison is proposing a program for residential Electric customers. To provide consistency for residential customers, a Solar Thermal option should be provided to Con Edison's residential electric customers as well as their gas customers. There will be program administration savings from a coordinated programs with similar measures.

The August 2008 NYSERDA REPORT #08-09: "*SOLAR DOMESTIC HOT WATER TECHNOLOGIES ASSESSMENT*" found that:

- **1.2+ Million NYS Households** can make effective use of Solar Hot Water (SWH) technologies
- **SHW can provide 50% to 70% of the annual energy** needed to heat hot water in most regions of the state
- **SHW can save 171 Million KWhs** of Electricity
- NYS was installing **~300 to 400 solar hot water systems per year** in 2005 and installation companies with a well-developed infrastructure have lower installed system cost
- A market penetration rate of **1% per year (~11,700/yr)** would create over **1,100 jobs**

EarthKind Energy provided an Independent Administrator proposal to Con Edison and the other utilities NYSERDA for an Solar Thermal systems for the 900,000 residences that use electricity to heat their hot water. Con Edison (and the other utilities) did not accept this proposal. EarthKind will be resubmitting the Independent Administrator proposal as part of the 90 day filings.

Sincerely,

*Ron Kamen*

Ron Kamen  
Senior Vice-President