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January 16, 2009

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

Re: <sup>8-E-1275</sup>  
Case 08-E-275

Dear Ms. Brillling:

I write with respect to the application by the owner/operator of Peter Cooper Village/Stuyvesant Town to submeter apartments within this complex. I am a long time resident of Stuyvesant Town. While I generally applaud efforts to increase energy efficiency, I have several concerns regarding this application:

1. **Apartments in Stuyvesant Town are not properly insulated.**

(a) There is **no weather stripping** on or around the apartment door. In the summer time, cool air from our apartment flows freely through the crack under the front door into the hallway from our apartment. This places unnecessary strain on our air conditioners, for which we currently pay a significant monthly surcharge, year round, and uses unnecessary electricity.

(b) Similarly, **Stuyvesant Town prohibits the proper installation of air conditioners**. The required model of air conditioner is intended to be installed almost flush with the window on the inside of the apartment and supported by a brace on the outside of the building. Stuyvesant Town prohibits this, requiring the air conditioner instead to be installed with support from the inside of the apartment, on the window sill, with about 1/3 of the air conditioner extending into the apartment. This breaks the seal that is intended to be around the air conditioner to keep hot air out in the summer (and cold air out in the winter). (This type of installation also makes the unit much noisier in the apartment.) Installers try to deal with this by stuffing insulating material around the air conditioner, with only partial success. Air still flows freely around the unit. I feel that if the intent of the submetering application is to reduce energy use and to shift electricity costs to tenants, these conditions should first be addressed so as not to place an unnecessary burden on tenants, a burden that we, because of lease restrictions, are powerless to address.

(c) **Roofs and apartment windows are exposed**. We live in a top-floor, south and east facing apartment. In the summer, the sun beats down on the roof and through the windows from dawn until sunset, making our apartment almost unlivable without air conditioning. To properly address energy consumption and before costs are shifted to tenants, measures should be taken to insulate the roofs. Awnings should be installed over windows to reduce the heat load. Has the landlord explored new green roof technology or the installation of solar panels to address energy efficiency? Cost shifting to tenants may be an effective tool to reduce energy consumption, but it is not, and should not, be the only way.


2. **Appliances are old and not energy efficient.** It is well known that one of the largest consumers of electricity in a home is the refrigerator. Stuyvesant Town, of course, provides refrigerators but, as might be expected in a rental, they are low-end models that are not energy efficient. Tenants are not allowed to purchase and install new, Energy Star appliances at the tenants' own cost. If tenants are to be responsible for electricity, we should be provided with Energy Star appliances first or, at the very least, be permitted in our leases to provide the same for ourselves without being in lease default.

3. **Submetering should not be considered a Major Capital Improvement.** As I understand it, the idea is to reduce energy consumption by making tenants responsible for electricity costs. I don't know if this actually works, but even so, it is difficult to see how cost-shifting improves the property. **Cost-shifting doesn't make the buildings any more energy efficient.** It just encourages tenants to use less electricity, whether or not they need the level they are using because of building inefficiencies. I believe that the measures I have outlined in this letter would, in fact, improve the property by making the buildings themselves more energy efficient and would **reduce the need for energy consumption** by tenants. These measures should certainly be required if the application is to be granted and an MCI increase awarded.

I appreciate this opportunity to express my opinion with respect to the application to submeter Peter Cooper Village and Stuyvesant Town. I am a very happy resident of Stuyvesant Town and, as stated above, generally support efforts to reduce energy consumption. The carelessness of tenants who do not pay an electricity bill certainly contributes to excessive consumption of electricity. Such carelessness, however, is by no means the sole nor even the primary contributing factor to excessive consumption. In our household we make it a point to turn off lights that we are not using, pull down the window shades on summer afternoons and use the air conditioners as sparingly as possible and only when we are at home. This is just part of being a responsible citizen. However, these measures are limited in the extent to which they can reduce energy use. Other measures depend on the actions and willingness of the landlord. Approval of the current application, without requiring the landlord to implement measures that would increase the energy efficiency of the buildings themselves, would penalize my family for electricity usage attributable to factors that are beyond our control. That penalty would be magnified if an MCI increase were to be awarded in connection with the submetering project.

I have outlined several items that I believe should be addressed before any submetering application is considered for approval. I am sure there are other measures that more knowledgeable individuals can suggest. I look forward to reading the comments of my neighbors.

Very truly yours,

  
Maria Cassidy