



November 22, 2010

VIA EMAIL: secretary@dps.state.ny.us

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

RE: Case 10-M-0457 - Petition of New York State Energy Research and Development Authority
in the Matter of the System Benefits Charge IV

Dear Secretary Brilling:

As representatives of Efficiency First, the national trade association of Home Performance contractors and the Efficiency First New York State Chapter, we are writing to acknowledge our support of NYSERDA's proposed continuation of Systems Benefit Charge programs under SBC IV. Over the past 12 years, NYSERDA has provided a leading edge vision for leveraging public funds cost-effectively to generate energy savings and tangible environmental benefits for New York State residents. This public policy vision has resulted in lasting changes to the state's energy resource landscape, not the least of which is evidenced by the Efficiency First membership including 70 contractors and stake-holders in the state.

Our member companies believe that continued support of NYSERDA's on-going market transformation and resource acquisition initiatives including statewide residential programs such as Home Performance with Energy Star, Assisted Home Performance, and Energy Star Homes is vital to ensuring that the Home Performance Contracting remains a robust industry in the state and continues to grow in market regions that have not yet reached maturity.

In particular, Efficiency First member companies urge the Commission to accept NYSERDA's proposal to allow for fuel-blind services to be incentivized for homeowners who may not have the resources to invest and yet also have the greatest need for energy efficiency improvements. In the current economic environment, it is more important than ever that these homeowners have continued access to programs like Assisted Home Performance and are not left behind as a result of the heating fuel that is available to them.

Efficiency First members are Home Performance contractors and energy professionals that work with homeowners every day, and we know that fuel siloing would be difficult for contractors to work with and difficult for customers to understand. Efficiency First asks that the Commission not adopt fuel siloing rules.

We further support NYSERDA's ongoing investment of SBC funds to promote workforce development initiatives and continued improvement of standards and codes. It is only through these kinds of programs that we will continue to raise the bar for energy efficiency in the state and in turn, continue the legacy of more than a decade to lead by example for the rest of the nation.

We fully support NYSERDA's approach of comprehensive whole-house energy solutions and hope that the Commission will accept NYSERDA's proposal for a renewed vision as the state enters into its fourth round of SBC programs.

Sincerely,



Damian Hodkinson
True Energy Solutions
Co-Chair, Efficiency First New York



Jeff Emerson
Blueox Energy Products and Services
Co-Chair, Efficiency First New York

Jared Asch
National Director,
Efficiency First

Efficiency First New York Chapter represents 70 Home Performance companies in the state. The New York chapter of Efficiency First is part of the national organization which represents over 1,100 companies and 9,000 workers nationwide.

Efficiency First is a national nonprofit trade association that unites the Home Performance workforce, building product manufacturers and related businesses and organizations in the escalating fight against global warming and rising energy costs. Efficiency First represents its members in public policy discussions at the state and national levels, to promote the benefits of efficiency retrofitting and to help our industry grow to meet unprecedented demand for quality residential energy improvements.