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April 19, 2010

Hon. Jaclyn A. Brillig, Secretary
NYS Public Service Commission
3 Empire State Plaza
Albany, NY 12223-1350

RE: 08-E-1132SP2 A Specific Agriculture Energy Efficiency Program (State Reg. id PSC-09-10-00012-P)

Dear Ms. Brillig,

New York Farm Bureau (NYFB) is the largest general farm organization in the state. We are proud to advocate for our farm family members who are representative of all types of agricultural production and who live and work in all parts of the state. As an organization, we believe strongly in programs and objectives that help encourage the long-term sustainability of farm businesses. For that reason we commend the Public Service Commission (PSC) for working with NYSERDA to put forth a draft proposal for a specific agriculture energy efficiency program. We appreciate the opportunity to provide comment on the draft and are very supportive of the general program concepts. NYFB respectfully encourages a rapid adoption and implementation of the agriculture program.

As the Commission discussed in its November 13, 2009 order,¹ the existing programs established under the Energy Efficiency Portfolio Standard generally do not address the unique needs of on-farm energy efficiency. Since energy represents a large cost to farm businesses, having the assistance to reduce overall energy use not only provides system benefits for ratepayers but also helps encourage the viability of farm operations. Due to the cost of some energy efficiency practices, without ratepayer support, farms would not be able to afford implementation, limiting the ability of agriculture to contribute to New York's energy use reduction goals.

We applaud NYSERDA for a rapid response to the Commission's Order. Its establishment of a broad range of stakeholders to advise in the development and implementation of the agriculture specific plan will increase the program's overall efficacy and efficiency.

¹ "Order approving certain commercial and industrial customer energy efficiency programs with modification and addressing independent program administrator filings"

Regarding the specific plan put forth by NYSERDA, it is our understanding that NYSERDA will seek to administer much of the outreach and coordination aspects of the program through the use of a third party contractor. We agree that use of a third party contractor that has experience working with farms would be an effective way to administer certain aspects of the program. We also believe that actual on-farm program implementation should be performed by any NYSERDA approved contractor chosen by the farm. Farms may already have service providers that they have worked with on previous projects. They should have the option to maximize these existing business relationships to encourage faster, more accurate implementation.

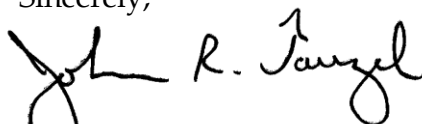
As a specific agriculture program is implemented, NYFB supports providing farms with maximum flexibility to match on-farm efficiency needs with existing technology. The final program should not restrict eligible equipment to one make or model, but rather establish general qualifying standards that individual on-farm contractors can then utilize to select the most appropriate product.

We believe the proposal's projected farm participation numbers do not adequately reflect the high demand of the program. The relevancy of this program in today's economic environment is quite significant and NYFB anticipates there will be strong demand by the farm community. With that in mind, we support a higher funding level as an initial allocation and the ability to request additional funds if qualified requests exceed funding prior to the end of the two year time frame. We recommend that all farms in eligible service areas, regardless of their grid connection status, have the opportunity to participate in the program, provided they are able to demonstrate that their participation will result in a net benefit to rate payers.

As we discussed in our comments to the Commission dated October 20, 2009, many of the existing utility administered programs are not easily matched with on-farm energy efficiency efforts. While the NYSERDA program is a positive step in addressing this issue, NYFB continues to hope that existing utility administered efficiency programs can be reviewed and amended to better meet the unique nature of farm operations.

Again, thank you to the Commission for its recognition of the need for a specific agriculture energy efficiency program. We respectfully urge the plan put forth by NYSERDA to be amended as discussed above, approved and implemented as soon as possible. Please know that NYFB stands ready to assist in any way possible with the implementation of this important program. As always, do not hesitate to contact us with any questions or concerns.

Sincerely,

A handwritten signature in black ink that reads "John R. Tauzel". The signature is written in a cursive style with a large, looped initial "J".

John R. Tauzel
Senior Associate Director of Public Policy