

PRICE RESPONSIVE LOAD COALITION
100 N. 17th Street, 14th Floor
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January 25, 2008

Hon. Eleanor Stein
Hon. Rudy Stegemoeller
Administrative Law Judges
New York State Public Service Commission
Empire State Plaza
Agency Building 3
Albany, NY 12223

**Re: CASE 07-M-0548 -Proceeding on Motion of the Commission
Regarding an Energy Efficiency Portfolio Standard.**

Dear Judges Stein and Stegemoeller:

This letter, in response to your "Ruling Establishing Comment Schedule" of January 11, 2008, supports the comments of the National Association of Energy Service Companies (NAESCO) on the proposal for the "EPS Administration Consensus Recommendation" filed by the Consensus Parties.

The Price Responsive Load Coalition (PRLC) was founded in 1999 by market participants looking to increase participation of Demand Response resources in wholesale markets. Currently the PRLC members include Integrys Energy, Energy Curtailment Specialists, Galt Power, Innoventive Energy, Energy Analytics, and EnerNOC, who represent some of the most significant players in the emerging Demand Response Industry.

The PRLC's Mission is to promote the ability of electric customers to respond to market signals through load reduction, curtailment, fuel switching, generation, energy-efficiency, and other technologies. The PRLC works towards ensuring that Demand Response can effectively participate in wholesale markets. The PRLC has actively participated in many of the NYISO and PJM Committees and Working Groups to further its mission and expand the opportunities for demand response participation in the developing ISO/RTO run wholesale markets.

PRLC members may respond separately to the EPS Administration Consensus Recommendation with specific comments.

The PRLC, like NAESCO, takes issue with the process used to arrive at the proposal of the Consensus Parties, as well as the substance of the recommendations contained therein. In particular, the PRLC is troubled that Demand Response Providers were not adequately consulted in the development of the proposal. It is the position of the PRLC that no meaningful and balanced discussion can be had on the Governor's goal

and the best means of achieving it without the active involvement of Demand Response Providers.

The PRLC specifically supports the continued use of the New York Energy Research Development Authority as the primary program administrator. To do otherwise would severely and unnecessarily hamper the timely and cost effective achievement of the Energy Portfolio Standards' goals.

The Demand Response Providers have demonstrated their ability to provide effective solutions to capacity and energy reductions through the New York Independent System Operator's Demand Response programs and would provide similar benefits if given the opportunity through a program design which is open to the free market forces.

Rick Mancini

Executive Director

Price Response Load Coalition