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Via Hand Delivery

June 20, 2008

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

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

Dear Secretary Brillling:

These comments are submitted on behalf of the Independent Energy Efficiency Program ("IEEP"), in response to the Commission's Notice Soliciting Comments issued May 30, 2008.

The IEEP is the energy efficiency arm of (now 24) municipal electric utility systems in New York State. The IEEP carries out an aggressive and robust energy efficiency program for its municipal member systems, in close cooperation with the New York Power Authority ("NYPA") and the New York State Energy Research and Development Authority ("NYSERDA").

The IEEP has no position on the incentive issues identified by the Commission in its *Notice*, as those issues may affect other parties. In so far as the IEEP and its member systems are concerned, incentives are unnecessary, and inappropriate. Energy efficiency services are a core mission of the IEEP's member systems. As public power systems, the IEEP systems consider energy efficiency to be an obligation. The member systems do not seek any further incentive to pursue energy efficiency programs, and would resist imposing on their customers the costs implicit in an incentive scheme.

Respectfully submitted,

READ AND LANIADO
Attorneys for the Independent Energy
Efficiency Program

By: 
Kevin R. Brocks

cc: Active Party List (Via Electronic Mail)