

**State of New York
Public Service Commission**

CASE 07-M-0548 – Proceeding on Motion of the Commission Regarding an Energy Efficiency
Portfolio Standard

REPLY COMMENTS OF CURRENT GROUP, LLC

Pursuant to the January 16, 2008 Ruling Establishing Comment Schedule, CURRENT Group, LLC (“CURRENT”)¹ files these Reply Comments in the above-captioned proceeding concerning the “Consensus Recommendation” by various parties proposing an administrative framework for energy efficiency programs in New York State. CURRENT wishes to comment on the Consensus Recommendation in only one respect: As CURRENT has urged at other points in this proceeding, New York can and should do more to fully exploit traditional efficiency measures such as improved building codes and weatherization programs. These types of programs appear to be the focus of the Consensus Recommendation, and CURRENT has no objection to the proposed structure for such initiatives. However, the State will not achieve its ambitious goals merely by doing “more of the same.” Transformational initiatives must be essential components of the State’s energy conservation regime if the 15 by 15 target is to be met.

To that end, CURRENT urges the Commission to retain jurisdiction over transformational energy efficiency measures that, by their nature, require (or benefit from) multi-

¹ CURRENT, a privately held company based in Germantown, Maryland and with its Network Operations Center in the Rochester, New York area, is the nation’s leading provider of Broadband over Powerline- (“BPL”) based Smart Grid solutions and services to electric distribution companies worldwide. CURRENT is also a fully integrated communications service provider offering high performance broadband Internet services to consumer and business users over existing electric power lines and in-home electric wiring. Further information about CURRENT is available at <http://www.currentgroup.com>.

utility or state-wide action. For example, deployment of the Smart Grid technologies that CURRENT has described elsewhere in this proceeding will involve a variety of questions solely within the Commission's jurisdiction, as will matters such as selecting, installing and financing advanced meters, establishing rate plans to encourage shifting demand away from periods of peak load, and creating economic incentives for utility investments to enhance energy efficiency. In these and other matters, the Commission should continue to work to create a regulatory climate that encourages transformative energy conservation efforts. More locally-focused organizations have an important role to play in energy efficiency in New York; but the Commission should retain jurisdiction over transformative energy efficiency endeavors in the State.

Respectfully submitted,

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