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Comment: Dear Planning Board Members and Staff, We are very encouraged by New York's efforts and look forward to the issuance of the final plan. Our only comment is that the Interim Report, other than in referring to an ongoing PSC proceeding, makes no reference to demand response. We believe that this is because demand response is intended to be subsumed within the broader term "energy efficiency," but the Interim Report does not make this clear. Just as an efficiently designed system of generation includes baseload, intermediate and peaking facilities, so too must an optimal system of demand side management (DSM) include energy efficiency, economic demand response and emergency demand response. Indeed, the DPS staff in the EEPS case has referred to problems with system load factors that can arise when DSM investments are limited to just baseload/energy efficiency measures. Peaking/demand response is required as well. The final state energy plan should clearly state either that references to energy efficiency also refer to demand response, or adopt the use of a more generic term (such as demand side management) when overarching goals are discussed. Best Regards,  
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