

February 7, 2010

Pennsylvania Public Utility Commission
Commonwealth Keystone Building
Attn: Secretary's Bureau
2nd Floor, Room-N201
PO Box 3265
Harrisburg, PA 17105-3265

Dear PUC Secretary James McNulty:

Re: Comments on PUC Proposal to Create a Uniform Set of Standards for Weatherization Training – Docket # M-2010-2152691

Comments due on Friday, Feb. 12, on the following:

- Current training required by the electric and gas utility companies of its employees and contractors that conduct weatherization audits
- Impact on companies' existing Low Income Usage Reduction Programs (LIURP)
- Cost impact of changes in training certification
- Program impact of changes in certification on Act 129 plans

The Energy Coordinating Agency fully supports the Pennsylvania Public Utility Commission's proposed requirement to establish a uniform set of training standards for all energy efficiency auditors and installers, whether employed directly by electric and natural gas utilities or by their contractors and subcontractors and to make those standards consistent with those developed by the PA Department of Labor and Industry for the Weatherization Assistance Program.

The benefits from statewide standardization of training are very significant and will increase the quality of work performed, the level of energy savings achieved, the number of energy efficiency jobs created, the workers' professionalism and eventually, the strength and size of the clean energy workforce in Pennsylvania. By developing a high, uniform standard to which all residential energy conservation technicians must adhere, all the following benefits will flow:

Consumers will Benefit:

We believe that the state's consumers receiving home weatherization services will benefit through this change:

- Higher quality work will be performed, resulting in higher energy savings, greater bill reductions, fewer callbacks, and higher levels of safety and comfort in homes.
- Workers will be uniformly able to educate consumers on energy efficiency
- Consistency in level of work performed during weatherization

Utilities' Programs will Benefit:

The Department of Labor and Industry (L&I) now requires that all Weatherization Assistance Program (WAP) workers be trained and certified to state and national standards. L&I has significantly expanded weatherization and energy efficiency workforce development capacity in Pennsylvania by increasing from one to six training centers across the state, and by putting in place a statewide intake, screening and testing process involving all Career Links and the training centers. This statewide system provides much more opportunity for training, and greater convenience at lower cost to trainees and their employers. There is also a rapid growth in the range of training available in Pennsylvania and a rapid growth in the number of highly skilled certified trainers. All of this infrastructure has been built within the last year, and is now available to the utilities and their CSPs.

With the current level of training given to WAP workers, the impact on the utilities' LIURP and Act 129 budgets should be minimal to ensure that all their Conservation Service Providers meet state and national standards as well. LIURP and WAP already share many of the same contractors statewide and it has long been a recommendation of the PUC that the LIURP program should be coordinated with WAP.

Current training standards in utility programs are uneven across the state, and in many cases unarticulated, leaving the programs exposed to poor quality workmanship and lower quality results than would result from higher training standards. Poorly trained workers increase the burden on program administration and inspection to make up for inadequate performance in the field. Like the old adage "An ounce of prevention is worth a pound of cure," it is equally true that all the inspection and oversight in the world cannot compensate for inadequate training.

Workers will Benefit:

All WAP auditors in PA must be trained and certified Building Performance Institute (BPI) Building Analysts by July 2011. This certification is also required for the national Home Performance with Energy Star Program. Thus with this requirement, the PA L&I has unified these two workforces: the low income and the market rate workforces in Pennsylvania. This is critically important for a number of reasons vital to market transformation: consistent quality of work, higher public confidence in energy efficiency retrofit work, higher energy savings etc.. But it is also critical to the employees, giving them a nationally recognized and highly prized credential that is portable across employers and across state lines. It is an important credential which will prepare them for further progress in a career in clean energy. Establishing a uniform standard for all auditors, employees, and contractors is important so that these workers have secure employment and are able to transfer their skills to another program easily if necessary.

Pennsylvania will Benefit:

Most importantly, the proposal will help ensure green job creation throughout the state. The initial expansion of the WAP program alone expects to create 1,000 new jobs, and the federal, state, and private infusion of money into weatherization programs will require far more capacity than at current levels for weatherization workers.

According to the recently released “The Pennsylvania Green Jobs Report” January 2010, Pennsylvania is currently third in the nation in the number of clean energy jobs. Developing high uniform training and certification standards will help us stay in a leadership position as the competition increases.

This is a critical step in building high quality energy efficiency and conservation programs and ECA commends the PUC for its leadership in this area.

Respectfully submitted,

Liz Robinson
Executive Director
Energy Coordinating Agency