



March 25, 2010

Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
Harrisburg, Pennsylvania 17120

**RE: Docket No. M-2010-2152691
Training Certifications for Weatherization Installations and Audits**

PA Home Energy thanks the Pennsylvania Public Utility Commission (PUC) for the opportunity to submit comments on Training Certifications for Weatherization Installations and Audits. PA Home Energy is a residential energy efficiency program for new and existing homes, funded by the West Penn Power Sustainable Energy Fund, and managed by Performance Systems Development (<http://www.pahomeenergy.org>). Since its launch in late 2007, PA Home Energy has developed a statewide infrastructure of companies serving the residential energy efficiency marketplace, and is an official sponsor of Home Performance with ENERGY STAR and ENERGY STAR New Homes in Pennsylvania. PA Home Energy and its network of Service Providers respectfully ask the PUC to consider the key concerns of PA Home Energy when reviewing the impact of the proposed training certifications on existing programs in Pennsylvania.

Intent to Apply to Non-Low-Income Utility Programs: The Commission seeks comment on the level of training and certification that should be required of residential weatherization installers and auditors employed by electric distribution companies (EDC), natural gas distribution companies (NGDC) and their contractors. It is unclear whether the required training and certification applies to auditors and installers working on EDC/NGDC low-income residential programs, or to ALL EDC/NGDC residential programs, including the audit and whole-house programs for non-low-income customers most of the EDCs have specified in their Act 129 EE&C Plans. The intent of the Commission needs to be clarified.

Recognition of BPI and RESNET: Both the weatherization training centers and those training to the national RESNET/BPI standards have substantial experience in residential energy efficiency. The contributions and expertise of both groups should be recognized by the PUC. The incumbent certifications for residential energy efficiency at the national level are the Building Performance Institute (BPI) and the Residential Energy Services Network (RESNET) certifications. The standing of both these certifications is well-recognized at the national level by a number of relevant federal agencies.



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Disruption to Established PA Programs: RESNET and BPI certification has been the focus of the PA Home Energy program and the Keystone HELP program for the past three years. Both encourage programs, and the contractors working in these programs, have invested substantially in training and certification to these national standards. Requiring weatherization certifications for all utility work would disrupt the significant work that PA Home Energy has done to establish a standard for residential energy efficiency in Pennsylvania.

Impact on Act 129 Programs: EDC non-low-income residential audit/whole-house programs plan to roll out in the next few months. It is doubtful that the weatherization training centers would be able to train/certify contractors in a timely manner to allow implementation of these programs. If not, EDCs would be constrained to use only workers who already have weatherization certifications, which could limit EDCs' ability to meet their Act 129 goals. The majority of workers with weatherization certifications are fully involved in delivering low-income weatherization services, due to the increased ARRA funding for such services.

Exclusion of Private-Sector/Community College Training Services: Private-sector training companies and community colleges in Pennsylvania have invested in the ability to deliver energy efficiency training in accordance with national BPI and RESNET standards. Training organizations and educational institutions should be encouraged to, not discouraged from, training contractors for long-term transformation of the home improvement market. Requiring the use of state-funded training centers would very significantly compromise the ability of the private sector to deliver these training services to their previously established markets.

Impact on Established Contractor Infrastructure: Forcing utility programs to use a certification that is different from the national certifications used by PA Home Energy and Keystone HELP for the past three years is an unnecessary burden to the programs, threatening their success. The change in certification is also a burden and a cost to contractors who have already undergone considerable training, at their own expense, to meet these national certifications. Hundreds of contractors engaged in programs like PA Home Energy have invested their own time and money in training and certification to the nationally recognized RESNET and BPI standards. PA Home Energy service providers have been mentored and their work is subject to quality assurance field inspections. They should not be required to invest additional time and money to invest in weatherization certifications in order to participate in utility programs. Even if private-sector contractors take advantage of the weatherization test-out option (obtaining certification by taking the test, thus avoiding the training itself), there would still be significant time and lost revenue involved in undergoing testing.

Isolation of PA from National Standards and Pending Legislation: The US Department of Energy, the Department of Housing and Urban Development, and the US Environmental Protection



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Agency have all supported the development of the national certifications and standards of BPI and RESNET. The U.S. Department of Energy is working on the creation and/or adoption of a common national standard that is expected by September 30, 2010. States should adopt or align with the national standard. Upcoming national legislation (such as Home Star and Retrofit for Energy & Environmental Performance) will reference national standards, not state standards; Pennsylvania's contractors and consumers could face delays and unnecessary burdens in accessing national funding if they abandon national certification standards. Individual states with individual standards will make the existing market confusion worse than it is already. Certifications need to be portable from state to state and program to program. Pennsylvania should not create a standard that will isolate its workers from (1) the ability to work outside the state and (2) the ability to participate in national programs.

Distinction of Private-Sector Residential Services: While many of the technical skills required are similar for Weatherization Assistance Program (WAP) workers and private-sector contractors involved in residential energy efficiency, the business skills required are very different. WAP workers are delivering a fully-paid-for service to low-income homeowners selected by the program, delivering measures specified by the program. Private-sector contractors are selling a service to paying customers, delivering services chosen by the customer. A different training emphasis is required to *sell* energy improvements, and analyze their cost-effectiveness; this emphasis is not addressed in the weatherization certifications.

PA Home Energy thanks the PUC for this opportunity to comment on weatherization training requirements.

Sincerely,

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