



Energy Coordinating Agency of Philadelphia, Inc.

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March 24, 2010

Secretary James J. McNulty
Pennsylvania Public Utility Commission
PO Box 3265
Harrisburg, Pennsylvania 17105-3265

M-2010-2152691

Dear Secretary McNulty:

Please find enclosed ECA's Comments on Training Certification for Weatherization Installations and Audits. Contact information is submitted. Thank you.

Sincerely,

Liz Robinson (LR)

Liz Robinson
Executive Director

LR/cas

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Comments on Training Certifications for Weatherization Installations and Audits

Docket # M-2010-2152691
Pennsylvania Public Utility Commission
Secretary James J. McNulty
PO Box 3265
Harrisburg, PA 17105-3265

March 22, 2010

Submitted by:
Liz Robinson, Executive Director
Energy Coordinating Agency of Philadelphia
1924 Arch Street
Philadelphia, Pa. 19103

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The Energy Coordinating Agency fully supports the establishment of a uniform set of training and certification 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 and the emerging national standards being developed by the U.S. Department of Energy.

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 consistently able to educate consumers on energy efficiency
- Consistency in level of work performed during weatherization and energy conservation retrofits

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 seven 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 rapid growth in the range of training available in Pennsylvania and 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 Conservation Service Providers.

With the current level of training given to WAP workers, the impact on the utilities' Low Income Usage Reduction Program (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 programs, 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 that is consistent with national standards for all auditors, installers, 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 PA Department of Labor and Industry's 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.

Pennsylvania's Standard Must be Consistent with National Standards

It is critically important to recognize that the curriculum and standards will evolve over time in order to keep pace with advances in technology and methods. Pennsylvania is quite new to the adoption of consistent standards for residential energy efficiency. The Department of Labor and Industry adopted statewide standards for the WAP program only six months ago. There are gaps in this standard which need to be addressed. For example, there is no standard for HVAC training, for Energy Education, or Multi-Family Buildings.

The U.S. Department of Energy is now reviewing the existing training standards and curriculum for the Weatherization Assistance Program, and is expected to issue a series of contracts in the very near future in order to refine and improve upon existing WAP training.

The Building Performance Institute (BPI), whose Building Analyst training is probably the closest we have now to a national standard, is currently refining its curriculum. BPI could well become the national standard for training and certification. **It is critically important that Pennsylvania be consistent with the national standard.**

In developing a statewide standard for Pennsylvania, it will be critical to make a distinction between technical training and program specific training. Obviously it is only the technical training that can be standardized. BPI is excellent technical training, and should be required for home auditors and wherever else it is applicable. The state needs to develop an equivalence between BPI and state certification. There are approximately 200 BPI certified auditors in Pennsylvania who are working on the market rate side of the industry, rather than in low income programs. There needs to be a simple test out procedure developed to determine if an incumbent worker is qualified. The state does have a test out procedure currently available, but it needs to be applied more broadly and made much more accessible.

Need for a Statewide Training Committee

There is an urgent need to establish a statewide training advisory committee, composed of representatives of the Pa. Department of Labor and Industry (L&I), the Public Utility Commission (PUC), Department of Community and Economic Development (DCED), Department of Environmental Protection (DEP), the training centers, the utility industry, other employers, and national experts. This group needs to meet to develop the standards and certification requirements to be put in place statewide.

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.