



AFC FIRST FINANCIAL CORPORATION
AFC FIRST ENERGY CENTER
1005 BROOKSIDE ROAD | P.O. Box 3558
ALLENTOWN, PA 18106
(610) 433-7486 | (610) 433-7488 FAX | (888) AFC FIRST
afcfirst.com | keystonehelp.com | energyloan.net | ctsolarlease.com

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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

AFC First Financial Corporation operates the Commonwealth's highly successful Keystone HELP (Home Energy Loan Program) www.keystonehelp.com in partnership with Pennsylvania Treasury, DEP and PHFA. Keystone HELP has provided financing to over 5,000 Pennsylvania middle-income homeowners for close to \$40 million in energy efficiency and whole house improvements in the last three years. Work is performed by over 1,500 Approved Keystone HELP contractors – private businesses engaged in heating, cooling and remodeling work. The mission of Keystone HELP has been to not only address emergency repairs like heating replacements but also to take the lead in the market transformation of the energy improvement industry toward a "whole house" approach. To this end Keystone HELP offers lower interest rates for whole house improvements, particularly those that meet the guidelines of Home Performance with Energy Star as monitored by the program sponsor PA Home Energy.

The biggest obstacle to moving contractors into a more holistic approach to energy efficiency has been their perception that there are no strong national standards for contractor training and accreditation and that it would be difficult to make a profitable market in the Home Performance business. That has radically changed in the last year as Keystone HELP has trained over 700 contractors in "Home Performance 101" – introducing them to the concepts that would propel them to embrace Home Performance as a viable business model. The other key is the clear emergence of BPI (Building Performance Institute) and RESNET as the national standards and the foundation for all proposed federal programs such as Home Star. Market driven contractors are now elevating their businesses and their expertise by rushing toward BPI certification. This has been the goal of Pennsylvania and Home Performance with Energy Star program nationwide all along. Now that it is happening it would be confusing and redundant to add additional layers of training to contractors who already meet the high national standard of BPI certification.

We concur with PA Home Energy's comments as summarized here:

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.

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 and Keystone HELP have done to establish a standard for residential energy efficiency in Pennsylvania.



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. Keystone HELP has partnered with Lehigh Carbon Community College to create the Green Energy Training Center which is seeing wait lists for all its training programs.

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 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.

We appreciate the opportunity to comment. As an organization that deals daily with the "feet on street" of market based energy efficiency contractors, the requirement of training outside the national standards would be a huge impediment to the growth of the private Home Performance contracting business in Pennsylvania.

Sincerely



Peter J. Krajsa
Chairman & CEO