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March 31, 2010

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

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

Dear PUC Secretary James McNulty:

Affordable Comfort, Inc. (ACI) commends the Commission for its interest and action in training and certification for the home energy retrofit workforce. ACI appreciates the opportunity to respond to this order. ACI supports the adoption of common national standard work requirements and comprehensive training programs which comply with nationally recognized standards for Pennsylvania utility-sponsored residential energy retrofit programs. State-level training and certification should grow into alignment with established national standards.

There are significant benefits of aligning any Pennsylvania home energy retrofit training and certification with recognized national standards as represented by the Building Performance Institute (BPI).

Pennsylvania home energy retrofit training and certification alignment with BPI will provide important portability for the workforce across programs, service territory, and states. This alignment will provide a consistency that will reduce market confusion for the customer and the service providers.

An alignment with national standards such as BPI will be consistent with DOE's ARRA initiatives, EPA's Energy Star programs, and the Keystone HELP program. The PA Home Energy Program is a part of the EPA Energy Star programs and uses these national standards.

Alignment with national standards creates an environment that will permit immediate response to job creating roll-outs with federal initiatives like Home Star, PACE, other financing opportunities that call out BPI. Home Star legislation was released March 29, 2010 with bipartisan support as Senate Bill 3177. The House bill is expected to be released after the Easter break. Home Star is designed to complement and work with state and utility initiatives already in place.

Already 500 Pennsylvania practitioners and home performance contractors hold BPI certifications. These certifications have been earned at their own expense. These practitioners are in position to respond to state, federal, and utility retrofit programs. The 100 contractors involved in the Pennsylvania Home Energy Program are required by the program guidelines to participate in on-going training and quality assurance inspections by a third party.

It is important to avoid creating a barrier to participation by these existing, trained service providers. Demanding additional investment of time and money to those individuals and companies who are BPI certified and working in programs with on-going mentoring and third party quality assurance would be wasteful. These highly qualified contractors are the very businesses that Pennsylvania should be encouraging to grow. These are the companies who have made a commitment to quality. They are

eager to add employees with the assurance that the company commitment to training and to quality is already in place.

ACI recognizes that some shortcomings exist in both WAP, BPI, and RESNET standards development and trainings. Until the advent of ARRA funding standards development and trainer preparation and requirements for qualifying curriculum and training programs have been significantly underfunded. DOE is making standards development, training qualifications, financing tools, energy labeling/metrics, and assessment tools high priorities in the Recovery through Retrofit initiative. It would be premature to create a state-level certification when large amounts of funding are being directed to the creation of a national standard for these things through the national labs and with deliverables by September 30, 2010.

Pennsylvania's state plan for the Weatherization Assistance Program calls for BPI Building Analyst certification for energy auditors and instructors by July 2011. This is an important sign that leaders in our State agencies understand the value of national standards and have begun to move toward recognizing appropriate ones.

Collaboration among the various programs and sponsors - WAP, utility, and market-based initiatives can address the gaps in each training and certification path. The ultimate goal in both private and public sector programs is to make each effort more effective in reducing energy consumption and in meeting very aggressive program goals.

ACI recommends that:

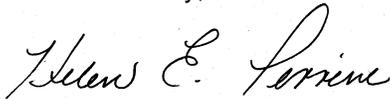
1. Modifications be made to the PUC order to include BPI certification and accreditation as equivalent to the Pennsylvania Training and Certification for installers, crew chiefs, and auditors as offered by the Weatherization Training Center;
2. A stakeholder working group be established immediately to investigate and address the gaps in the training and certifications to improve training plans to be comprehensive and compliant with national standards. The working group should include, but not be limited to, representatives from State agencies such as the PUC, DCED, L and I, and the DEP; the home performance contractor network; WAP subgrantee organizations, utility companies and their Act 129 contractors, the WTC instructors, union-based trainers, community colleges, and residential energy efficiency advocacy organizations such as ACI, Efficiency First, and the Keystone Energy Efficiency Alliance;
3. Recognition be given to the difference between technical standards and program standards. Program standards may differ due to the goals of the program as set by regulators, the federal government, or program sponsors. Technical standards are comprised of the methodologies, protocols, and best practices that are based on building science principles and expressed by understanding the job task analysis, standard work requirements, job instruction protocols, skill sets, and verification of performance.
4. The PUC implement a training and certification requirement for all utility energy retrofit programs immediately with the condition that the training and certification requirement conform to BPI standards and certifications.

ACI's Board of Directors and our constituent network includes professionals from utility programs, weatherization, and market-driven sectors. ACI represents the 25,000 person North American network of residential energy retrofit professionals, manufacturers, and businesses that have made a commitment to using the systems approach to whole house retrofit to achieve optimal energy performance without compromising the health, safety, and comfort of the families, nor the durability of the building. ACI has been educating program managers, practitioners, trainers, inspectors, raters, auditors, and policy makers in best practice for retrofit since 1986. ACI has been named the premier training event for the home

performance industry for the United States and Canada and is the principal provider of continuing education opportunities for the industry.

ACI staff is actively engaged with DOE, EPA, and HUD in residential energy retrofit programs. We are also engaged with BPI, RESNET, and Efficiency First at the national level as well as with the PA Home Energy Program and similar programs in other States.

Sincerely,

A handwritten signature in cursive script that reads "Helen E. Perrine".

Helen E Perrine
Senior Advisor, ACI