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Pennsylvania Public Utility Commission

Commonwealth Keystone Building

400 North Street

Harrisburg, PA 17120

**RE: Docket No. M-2010-2152691**

**Training Certifications for Weatherization Installations and Audits**

Conservation Consultants, Inc. (CCI) thanks the Pennsylvania Public Utility Commission (PUC) for the opportunity to submit comments on Training Certifications for Weatherization Installations and Audits. Conservation Consultants, Inc. is a 32-year-old not for profit with a mission of promoting “responsible energy use”. Since 1988, CCI has administered and/or provided services for the implementation of Pennsylvania’s Low Income Usage Reduction Program (LIURP). At present, CCI is under contract to Columbia Gas, Duquesne Light Company, Equitable Gas, Peoples Gas and TWPhillips to provide services for their respective LIURP programs. In addition, CCI is service provider of PA Home Energy and as such provides audit and inspection services to the middle and upper income market.

**Intent to Require Training for LIURP providers:** CCI would like to suggest that there is a clear distinction between the training needed to assess the needs of an electric baseload customer vs. what is necessary to assess an electric or gas heating customer.

CCI’s electric baseload auditors receive two weeks of academic training by CCI senior staff followed by several in-the-field experiences. All baseload auditors have attended training and have received certifications from the Penn College of Technology at Williamsport. These courses include:

- Diagnostics Approaches to Weatherization
- Advanced Diagnostic Approaches to Weatherization
- Introduction to Residential Heat Systems
- Basic Residential Electricity
- Weatherization Tactics

CCI believes this level of training is sufficient for the types of measures required by electric baseload customers. CCI does not support requiring weatherization certifications for all residential auditors working on EDC/GDC programs.

Conversely, heating auditors require a good deal more training and as such, CCI’s auditors have BPI and RESNET certifications. CCI deploys BPI/RESNET certified

auditors to assess all electrically heated homes, gas heated homes or multi-family residences where additional skills are warranted.

**Home Star Energy Retrofit Act of 2010.**

Of particular relevance to this topic, we offer the following text extracted from the recently filed Home Star Energy Retrofit Act bill introduced in the Senate.

**(b) CONTRACTOR QUALIFICATIONS FOR GOLD STAR**

**HOME ENERGY RETROFIT PROGRAM.**—A contractor may perform retrofit work under the Gold Star Home Energy Retrofit Program in a State for which rebates are provided under this Act only if the contractor—

(1) meets the requirements for qualified contractors under subsection

(a); and

(2) is accredited—

(A) by the BPI; or

(B) under other standards approved by the Secretary, in consultation with the Administrator.

Additionally, page 13 of the Act indicates that Quality Assurance Providers can be either BPI or RESNET certified.

CCI believes that it is important the Pennsylvanian standards comply with national standards in order that our residents may easily take advantage of both national and state sponsored programs and opportunities. Adding an additional layer of required training or certification can only slow down the progress in Pennsylvania. Both the weatherization training centers and those training to the national RESNET/BPI standards have substantial experience in residential energy efficiency. These contributions and expertise of both groups should be recognized by the PUC.

Thank you for your consideration. Should you have any questions, please feel free to contact me at 412 431-4449 X 200 or [anng@ccicenter.org](mailto:anng@ccicenter.org).

Best Regards,



Ann Jones Gerace



Executive Director