



March 31, 2010

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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 Secretary James McNulty:

The Keystone Energy Efficiency Alliance (KEEA) appreciates this opportunity to comment on Docket Number M-2010-2152691, the Joint Motion of Commissioners Gardner and Pizzigrilli regarding training certifications for weatherization installations and audits.

KEEA supports the Commissions recommendation for training and certification to common standard work requirements for home energy retrofit workers in Pennsylvania utility company programs.

KEEA recommends that Building Performance Institute (BPI) Building Analyst certification be accepted as equivalent to the present Department of Labor and Industry weatherization certification for experienced home performance contractors.

Pennsylvania utility companies can implement their programs faster and at a reduced cost by utilizing BPI certified home performance contractors for their programs. These contractors have already invested their own time and resources in training and certification. They understand the benefit of building consumer confidence by investing in independent quality

assurance inspections. They are building their business reputations by making a commitment to quality installations and customer satisfaction.

The option to accept BPI certified and accredited contractors expands the pool of service providers available to LIURP, Act 129, and other residential energy retrofit programs. The very successful Keystone Home Energy Loan Program (HELP) requires training and certification for its contractors and allows the most preferential terms for consumers who use BPI certified contractors. In addition, this growing corps of BPI certified contractors expands the green workforce and positions Pennsylvania to respond quickly to pending Federal initiatives such as Home Star, PACE, and other Recovery through Retrofit programs. More than 500 Pennsylvanians hold BPI certification and more than 80 contractors are enrolled in the PA Home Energy Program, a program that requires independent inspections.

BPI certification is referenced by the EPA suite of Energy Star® programs. In addition, BPI Building Analyst certification for auditors and instructors is called for in the Pennsylvania WAP State Plan with an effective date of July 2011.

BPI is recognized by WAP, utility, and State programs in 35 States. DOE is currently investing significant funding into the creation of a common national standard that would integrate WAP, utility, union, and other similar standards with BPI.

KEEA understands that there are important differences between programs that target low-income consumers and those that homeowners invest in. It is most important that service providers adapt to program requirements and understand the reasons for those requirements. In the private sector service providers need to solve customer problems and learn to sell the benefits of improved energy performance. Behind these obvious differences, the building

science and the laws of thermodynamics are the same. Every Pennsylvania family deserves to have the best possible energy performance from their home that technicians and contractors can provide with the resources at hand. Air leakage, carbon monoxide, and energy waste are equal opportunity offenders. The solutions for solving energy waste problems are the same in homes across all social and economic categories yet at the same time the solutions are unique to every situation. The nature of these problems requires contractors who learn from their experiences and build on a strong foundation. Common national standards reduce the chance for market confusion and they bring equity to families who want to reduce energy consumption.

Finally, KEEA recommends that the Commission convene a stakeholder meeting with a professional facilitator to resolve the differences in our technical standards and our training and certification plans in an effort to have a stronger common training and certification plan that embraces utility, weatherization and private sector services. Members of KEEA, PA Home Energy and Keystone Help are all interested in participating in any stakeholders meetings the Commission convenes. Common standards allow for common messaging, result in a stronger green workforce and a greater chance of achieving the benefits of reduced energy consumption.

Thank you for this opportunity to respond to this order.

Sincerely,

*Maureen Mulligan*

Maureen Mulligan  
On behalf of Keystone Energy Efficiency Alliance

