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March 31, 2010

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Mr. James J. McNulty, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, Second Floor
Harrisburg, PA 17120

**PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU**

Re: **Training Certifications for Weatherization Installations and Audits**, Docket
No. M-2010-2152691

Dear Secretary McNulty:

Enclosed for filing, please find an original and three (3) copies of the Comments of UGI HVAC Enterprises, Inc. and UGI HVAC Services, Inc. in the above-captioned proceeding.

Copies of the enclosed Comments are being served by electronic mail to the individual Commission Staff members identified in paragraph three of the Commission order entered March 2, 2010.

If you need anything further, please do not hesitate to contact me.

Sincerely,

Kent D. Murphy
Counsel for UGI HVAC Enterprises, Inc.
and UGI HVAC Services, Inc.

Enclosures

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Training Certifications for Weatherization : Docket No. M-2010-2152691
Installations and Audits

COMMENTS
OF
UGI HVAC ENTERPRISES, INC.
AND
UGI HVAC SERVICES, INC.

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PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

In accordance with the Order of the Pennsylvania Public Utility Commission (“Commission”), entered March 2, 2010 in this proceeding (“March 2nd Order”), UGI HVAC Enterprises, Inc. and UGI HVAC Services, Inc. (together, the “UGI HVAC Companies”) hereby submit these comments on the questions posed by the Commission in the March 2nd Order.

I. INTRODUCTION

In the March 2nd order, the Commission seeks comments on the level and type of training that should be required of residential weatherization installers and auditors employed by electric distribution companies (EDC), natural gas distribution companies (NGDC) and their contractors in LIURP programs as well as the EDC’s Act 129 plans. The March 2nd Order discusses the Pennsylvania Department of Community and Economic Development’s (“DCED’s”) training and certification requirements under the

state-wide Weatherization Assistance Program (“WAP”). Specifically, the March 2d Order provides:

The Pennsylvania ARRA WAP budget includes adequate funding to establish a training program for WAP agencies and for other public and private-sector weatherization providers. To implement this training, L&I is now supporting seven geographically dispersed training centers across the Commonwealth to provide weatherization training to students learning to become weatherization installers, crew chiefs and auditors. These centers will train and certify workers to complete high-quality energy reduction, conservation and weatherization activities in single- and multi-family homes across the state.

March 2nd Order at 4. Among other requests, the Commission requests comments on the question of “whether utilities conducting similar weatherization audits would benefit from the same training certifications.” Id.

II. BACKGROUND ON UGI HVAC COMPANIES.

UGI HVAC Companies provide heating and cooling, weatherization, energy audit, electric, refrigeration, and related services throughout Central and Eastern Pennsylvania. Our workforce includes 35 employees that have received energy audit certification through the nationally recognized Building Performance Institute (“BPI”) which provides nationally recognized certification of residential energy auditors, and provides weatherization and other courses related residential energy conservation. Under BPI standards, the energy auditor position requires the greatest skill sets among the three positions recognized by the WAP training program: weatherization installer, crew chief, and auditor.

In addition, these same UGI HVAC employees all have been trained and have a wealth of experience in combustion analysis of heating and water heating equipment, installation and service of heating, air conditioning and water heating equipment,

building air exchange requirements to support proper operation of this equipment, residential construction methods and all are trained in the requirements of the National Fuel Gas Code. UGI HVAC employees who work on weatherization projects have also received weatherization and lead remediation training from the Performance Systems Development Company (PSDC"). PSDC conducts certified training on behalf of the Building Performance Institute (BPI).

With this workforce, UGI has recently contracted to perform work under the WAP program and plans to offer weatherization services authorized by the Commission for various EDCs' Act 129 and potentially, gas and electric LIURP programs. UGI HVAC companies have operated favorably below the industry average in OSHA Recordable and OSHA lost time injury measures for the last three years and have enjoyed extremely high scores in Customer Satisfaction as measured by an outside third party agency. For the most recent trailing twelve month period a total of 4,056 customers who were surveyed and who answered the question, "Would you recommend UGI HVAC's Services to a friend or a neighbor?" over 97% of customers answered this question affirmatively.

III. COMMENTS

UGI HVAC Companies commend the Commission for opening the inquiry into the appropriate standards for training and certification of weatherization professionals for the LIURP and Act 129 programs. The UGI HVAC Companies acknowledge that consumers of weatherization services should be entitled to receive such services from well-trained and certified weatherization professionals. Receipt of quality weatherization

services from such individuals is necessary to further enhance the credibility to the weatherization industry and to achieve the energy conservation goals of the Weatherization Assistance Program administered by the Pennsylvania Department of Community and Economic Development (“DCED”), the Commission’s gas and electric LIURP programs, and the electric distribution companies’ Act 129 programs.

At this point, however, UGI HVAC Companies do not believe it would be appropriate for the Commission to immediately impose the requirements of training and certification required under the WAP program upon the weatherization providers under the Act 129 and LIURP programs. This position is based on 1) EDC’s Act 129 programs have already been approved based on installer and auditor requirements tied to BPI certification; 2) the limited space availability for PA WAP training and certification; and 3) the critical uncertainty as to how PA DCED will apply its policy of waiving formal training requirements for experienced and BPI Certified HVAC and weatherization professionals and allow them to take the certification test without additional in-class training. Each of these factors militate in favor of allowing installers, crew chiefs, and auditors qualified under the existing Act 129 and LIURP program qualification criteria to perform that work during a limited moratorium period, while they apply for and obtain WAP certification through the DCED certification process.

UGI HVAC Companies believe that a moratorium period for requiring DCED certification will allow currently qualified professionals the opportunity to continue to ply their trades and earn a living. At the same time, these same professionals should be expected to apply for and obtain WAP certification process administered by PA Labor and Industry. As designed, that process offers an accelerated means of certification for

experienced HVAC professionals, weatherization installers and energy audit professionals that permits the experienced professionals to take the certification test without the 21-day in-class training otherwise required for inexperienced or new installers. If those same experienced professionals do not pass the certification test, they will be required to take a 4-day advanced class before they are permitted to retake the test. As this application and testing process takes time, and the professionals must continue to earn a living, granting a moratorium period to gain certification would be reasonable.

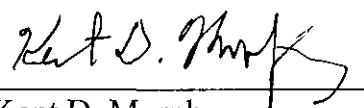
UGI HVAC Companies believe that, if the Commission concludes that a uniform certification process should be applied to the Act 129 and LIURP weatherization programs, a one-year moratorium period should provide weatherization professionals currently qualified under Act 129 and LIURP programs to apply for and obtain PA WAP certification. This moratorium should not apply however to currently unqualified weatherization professionals, who would be required to obtain PA WAP training and certification in order to perform such work. UGI believes that a one year period is the minimum period necessary for weatherization professionals to attain certification without unreasonable hindrance to their existing relationships with utility LIURP and Act 129 programs.

IV. CONCLUSION

UGI HVAC Companies believe that the goal of requiring statewide certification of weatherization professionals is a commendable one, as it would benefit the quality of the services provided consumers. However, immediate imposition of those requirements on the Commission's Act 129 and LIURP programs could jeopardize existing

relationships between the utilities and their weatherization service providers. Therefore, the Commission should implement a limited period of moratorium that would enable the weatherization industry to apply for and obtain PA WAP certification, without jeopardizing their businesses during the moratorium period.

Respectfully submitted,



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April 1, 2010

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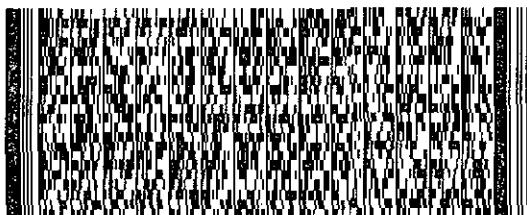
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