

800 North Third Street, Suite 301 • Harrisburg, Pennsylvania 17102  
Telephone (717) 901-0600 • Fax (717) 901-0611 • [www.energypa.org](http://www.energypa.org)

April 1, 2010

VIA HAND DELIVERY

James J. McNulty, Esq.  
Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
P.O. Box 3265  
Harrisburg, Pennsylvania 17105-3265

RECEIVED  
2010 APR - 1 PM 2:14  
PA PUC  
SECRETARY'S BUREAU

**RE: COMMENTS of THE ENERGY ASSOCIATION of PENNSYLVANIA  
TRAINING CERTIFICATIONS for WEATHERIZATION INSTALLATIONS  
and AUDITS  
DOCKET NO. M-2010-2152691**

Dear Secretary McNulty:

Enclosed for filing are an original and 3 copies of the Association's Comments on behalf of its members in the above-referenced docket.

Sincerely,

A handwritten signature in black ink, appearing to read "Donna M. J. Clark".

Donna M. J. Clark  
Vice President & General Counsel

Enclosures

CC: James H. Cawley, Chairman (w/ enclosure, via hand-delivery)  
Tyrone J. Christy, Vice Chairman (w/ enclosure, via hand-delivery)  
Robert F. Powelson, Commissioner (w/ enclosure, via hand-delivery)  
Wayne E. Gardner, Commissioner (w/ enclosure, via hand-delivery)  
Scott Gebhardt, Energy Program Specialist (w/encl., [sgebhardt@state.pa.us](mailto:sgebhardt@state.pa.us))  
David Mick, Supervisor – Energy Policy and Compliance (w/encl., [dmick@state.pa.us](mailto:dmick@state.pa.us))  
Stephanie Wimer, Assistant Counsel (w/encl., [stwimer@state.pa.us](mailto:stwimer@state.pa.us))

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

RECEIVED  
2010 APR - 1 PM 2: 14  
PA PUC BUREAU  
SECRETARY'S BUREAU

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

---

Comments of  
The Energy Association of Pennsylvania

---

**I. INTRODUCTION**

On March 2, 2010, the Pennsylvania Public Utility Commission (“PUC” or “Commission”) entered an Order seeking “comment on the level of training and certification that should be required of residential weatherization installers and auditors employed by electric distribution companies (“EDCs”), natural gas distribution companies (“NGDCs”) and their contractors...[in order] to assure that weatherization work is completed correctly and produces the expected energy savings.” Order at p.1. The Commission’s inquiry stems in part from an influx of federal stimulus funding provided to the existing Pennsylvania Weatherization Assistance Program (“WAP”)<sup>1</sup>, a portion of which has been designated to expand an existing training program and establish uniform certification for all workers participating in the federally funded weatherization programs. The Commission states in its Order that “[t]raining

---

<sup>1</sup> Stimulus funding for weatherization of \$252.8 million has been approved by the federal government and is in addition to the annual weatherization dollars received by WAP from the U.S. Department of Energy (“DOE”) and from the Pennsylvania Department of Public Welfare (“DPW”) in connection with the federal LIHEAP block grant. The stimulus funding must be fully expended by March 31, 2012. The Pennsylvania ARRA Weatherization Final State Plan details criteria and program parameters for the expenditure of stimulus funds. [www.newpa.com](http://www.newpa.com).

weatherization workers to meet a uniform minimum standard may serve to assure that weatherization is completed correctly and produces the expected energy savings.” Order at p.4. Inasmuch as workers will be required to complete specific training in order to participate with both the traditional WAP and stimulus-funded WAP, the Commission asks whether workers employed by the utilities or contractors to perform Low Income Usage Reduction Program (“LIURP”) measures or Act 129 weatherization services should be subject to the same training and certification requirements. The Commission also seeks comments on the impact such a change in training requirements would have on existing LIURP programs and the recently approved EDC Act 129 EE&C Plans from both a cost and program perspective.

The Energy Association of Pennsylvania (“EAPA” or “Association”) supports the Commission goals of ensuring good work quality and customer savings from weatherization services. Workforce training clearly plays an important role in meeting those goals. As such, a careful review of current training practices and their results should be undertaken prior to supporting a change to new untested standards. The Association files the instant comments on behalf of its members.<sup>2</sup>

## II. COMMENTS

Prior to the availability of stimulus funding, training of weatherization workers employed by WAP agencies and contractors for utility LIURP programs was made available through Penn College of Technology in Williamsport. In addition, some weatherization contractors/workers

---

<sup>2</sup> EAPA members joining in these comments include: Allegheny Power, Citizens’ Electric Company, Columbia Gas of PA, Duquesne Light Co., Equitable Gas Co., Metropolitan Edison Company, a *FirstEnergy Corp.*, National Fuel Gas Distribution Corp., PECO Energy Co., Pennsylvania Electric Company, Pennsylvania Power Company, a *FirstEnergy Corp.*, Peoples Natural Gas Company, Philadelphia Gas Works, Pike County Light & Power Co., PPL Electric Utilities, UGI Central Penn Gas, Inc., UGI Electric Utilities, Inc., UGI Gas Utilities, Inc., UGI Penn Natural Gas, Valley Energy, Inc. and Wellsboro Electric Co.

also obtained Building Performance Institute (“BPI”)<sup>3</sup> and RESNET training and certification. With respect to gas line and gas appliance safety checks, workers hold city/county certification for repair of interior gas lines, U.S. Department of Transportation certification for repair/replacement of exterior gas service lines and, in some cases, utility specific training relating to customer service. Additionally, some utilities provide company-sponsored training and/or pay conference fees for contractors at ACI Home Performance conferences to assist with maintenance of BPI certifications<sup>4</sup>. Employees of Association member companies do not routinely perform weatherization work for LIURP or pursuant to Act 129 programs. In fact, only one company has employees perform limited LIURP related installation and maintenance of HVAC equipment. The utilities uniformly contract with third parties for weatherization installation and audit services.

If the Commission were to adopt a new set of uniform standards for weatherization training, similar to that established by the Department of Labor & Industry (“L&I”) for workers participating in the federally funded WAP, the immediate impact would be whether a sufficient number of qualified third-party vendors would be available to meet the required production goals of LIURP and/or Act 129 weatherization services. Inevitably, a number of contractors which have regularly provided LIURP weatherization services would not be certified under the new L&I standards. These contractors, which often-times hold BPI/RESNET certifications, have undergone company specific training and have obtained experience and on-the-job training, would be precluded from continuing in the utility weatherization business. Having to renegotiate

---

<sup>3</sup> BPI is a nationally recognized credentialing organization for the residential energy efficiency retrofit and weatherization workforce. See also comments of PECO Energy Company which detail current BPI Training Standards and provide a comparison with the new training criteria established for the WAP workforce.

<sup>4</sup> EAPA directs the Commission to comments filed by its individual member companies which provide additional details regarding specific contractual qualifications and established practices for performing weatherization related services with a trained workforce.

contracts with existing vendors or seek new vendors would likely increase program costs, decrease productivity and hamper the ability of utilities to deliver weatherization programs and services to customers as required by law.

A related concern would necessarily be the availability of training programs/sites for those contractors seeking the required certification. Currently, the number of state-funded training locations has been increased from a single site in Williamsport to seven sites throughout the state. The new sites were funded in part through a L&I grant tied to the PA ARRA stimulus funding, which must be expended by March 31, 2012. Recognizing the short-lived nature of the stimulus funding, Pennsylvania certified weatherization training centers were required to develop a sustainability plan, describing how operations will be funded beyond March 2012, as part of the grant application.<sup>5</sup> Furthermore, anecdotal evidence suggests that even with seven sites for weatherization training and certification, not all currently qualified contractors have been able to *participate in training or receive certification through an accelerated procedure established by L&I.*<sup>6</sup> Any consideration of establishing a new set of uniform standards for weatherization training and requiring specific certifications for the current work force must consider the availability of training to those workers, now and in the future, after stimulus funds have been expended.

Additionally, in deciding whether a new set of uniform standards for weatherization training and certification is necessary, EAPA urges the Commission to consider the experience and outcomes of the existing LIURP, which uses a combination of for-profit and non-profit contractors for weatherization installations and audits and which has documented and verifiable savings. For over two decades, Pennsylvania's electric and natural gas distribution companies

---

<sup>5</sup> Announcement of Grant Availability (AGA) for Weatherization Training at: [www.newpa.com](http://www.newpa.com).

<sup>6</sup> Worker Certification Application (7/31/2009) at: [www.newpa.com](http://www.newpa.com).

have successfully operated their LIURP programs. Funded through residential rates and regulated by 52 Pa Code, Chapter 58, LIURP programs are aimed at helping low-income residential high-use households reduce their energy usage through various weatherization and energy conservation measures, and through energy education, resulting in more affordable bills.

The benefits of LIURP, however, extend far beyond affordable bills. A January 2009 study conducted by the Pennsylvania State University's Consumer Services Information System Project<sup>7</sup> of the utility-sponsored LIURP programs reported that, *"The list of customer, utility and community benefits includes: bill reduction; improved health, safety and comfort levels; LIHEAP leveraging (Pennsylvania receives additional funds due to the LIURP resources that supplement LIHEAP funds); arrearage reduction; reduced collection activity; improved bill payment behavior; reduced use of supplemental fuels and secondary heating devices; more affordable low income housing; impact on homelessness; and less housing abandonment."*

The Project credits the utility programs as being both *"cost effective and successful at meeting its goals of reduced energy"* and attributes their success to the *"ongoing evaluation"* built into the utilities' LIURP process. An integral part of the program regulations require utilities to collect and provide to the Commission various data from the LIURP household, including energy usage for the 13-month period prior to and following the installation of the weatherization treatments, so as to determine the difference in the household's usage. This data, along with additional household demographics are then used by the Commission to evaluate the program's overall effectiveness and to recommend modifications as necessary.

---

<sup>7</sup> The report is entitled Long Term Study of Pennsylvania's Low Income Usage Reduction Program: Results of Analyses and Discussion, and may be located at the PA Public Utility Commission website at: [http://www.puc.state.pa.us/general/publications\\_reports/pdf/PSU-LIURP\\_Report2008.pdf](http://www.puc.state.pa.us/general/publications_reports/pdf/PSU-LIURP_Report2008.pdf)

Based on the LIURP track record, confirmed by the Commission and third parties, EAPA asks the Commission to carefully consider the need for new training requirements where, as here, the parties which would have to undergo the training are third party vendors experienced in the weatherization field as evidenced by the documented success of LIURP. Even without a Commission requirement, many of these contractors will eventually obtain the L&I sponsored certification if they intend to perform WAP weatherization services. An additional regulatory requirement by the PUC adopting new untested standards does not provide proven benefit to offset the impact on weatherization productivity and contractor availability.

Further, with respect to Act 129 weatherization, many of the EE&C Plans provide for an extension of existing LIURP for low-income residential customers, as well as weatherization measures for non-low-income customers. Savings are to be measured through the Technical Reference Manual and audit procedures established by the Statewide Evaluator. Results will be examined to determine Act 129 compliance. Additional training or certification requirements do not appear warranted, given the strict accountability for cost-effectiveness and energy savings under Act 129, coupled with the recognition that Act 129 programs for weatherization extend and mimic the very successful LIURP.

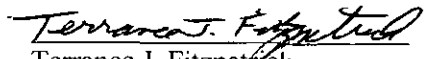
### **III. CONCLUSION**

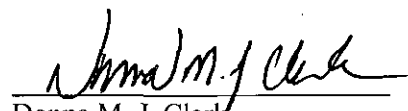
The Energy Association of Pennsylvania welcomes the opportunity to comment on this Order seeking input on the programmatic and fiscal impacts of standardizing current training and certification requirements for residential utility weatherization installers and auditors to match the training certifications required by the federally-funded state Weatherization Assistance Program for its grantees and subgrantees. The Association asks the Commission to refrain from

mandating new training and certification based on the current expertise of weatherization installers and auditors as evidenced by the successful utility LIURP.

Altering current practices which are a hallmark for cost-effectiveness, efficiencies and proven results, particularly at a time when the influx of stimulus funding coupled with Act 129 mandates have increased the workload and competition for contractor services would not be in anyone's best interest ... not the contactor, not the utility, and most certainly not the customer/ratepayer.

Respectfully Submitted,

  
Terrance J. Fitzpatrick  
President & CEO  
Energy Association of Pennsylvania  
800 North Third Street, Suite 301  
Harrisburg, PA 17102  
(717) 901-3912  
[tfitzpatrick@energypa.org](mailto:tfitzpatrick@energypa.org)

  
Donna M. J. Clark  
Vice President & General Counsel  
Energy Association of Pennsylvania  
800 North Third Street, Suite 301  
Harrisburg, PA 17102  
(717) 901-0631  
[dclark@energypa.org](mailto:dclark@energypa.org)

Date: April 1, 2010