

April 1, 2010

VIA OVERNIGHT UNITED PARCEL SERVICE

James J. McNulty, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor
Harrisburg, PA 17120

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

Dear Secretary McNulty:

Enclosed for filing are an original and four (4) copies of the Comments of Metropolitan Edison Company, Pennsylvania Electric Company and Pennsylvania Power Company pursuant to the Commission's Order in the above-captioned docket.

Please date stamp the additional copy and return it to me in the enclosed, postage-prepaid envelope. Please contact me if you have any questions regarding this matter.

Very truly yours,



Bradley A. Bingaman

dlm
Enclosures

c: As Per Certificate of Service

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PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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

**COMMENTS OF METROPOLITAN EDISON COMPANY,
PENNSYLVANIA ELECTRIC COMPANY AND
PENNSYLVANIA POWER COMPANY**

I. INTRODUCTION

On January 14, 2010, the Pennsylvania Public Utility Commission (“Commission”) adopted an Order in the above-captioned proceeding seeking comments 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 and their contractors. The Order was subsequently entered by the Commission on March 2, 2010. The Order invited interested parties to file comments within 30 days after the Order was entered and reply comments within 40 days from the date of entry of the Order.

In its Order, the Commission specifically seeks comments on the current *training* required by EDCs and gas utilities of their employees and contractors who conduct weatherization installation and audits, as well as the impact on the companies’ Low Income Usage Reduction Program (“LIURP”). The Order also requests comments on the cost and program impact of any changes from the EDCs’ approved Act 129 plans.

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PA PUBLIC UTILITY COMMISSION
SECRETARY’S BUREAU

Metropolitan Edison Company, Pennsylvania Electric Company and Pennsylvania Power Company (“the Companies”) respectfully submit the following comments in the above-captioned docket in response to the Commission’s invitation for comments regarding the Order.

II. COMMENTS

Following are the comments of the Companies in response to the Commission’s request for comments on the current training required of EDC employees and contractors who conduct weatherization installation and audits, the impact on the Companies’ LIURP programs and the cost and program impact of any changes from the EDCs’ approved Act 129 plans.

A. Current Training of Employees and Contractors.

The Companies’ employees do not conduct weatherization installations or audits. The Companies contract with Community Action Program agencies, state Weatherization Assistance Program agencies, and private contractors for their LIURP and Act 129 Programs. Pursuant to the contracts utilized to implement these programs, the Companies’ LIURP auditor or crew chief who will decide the measures to be installed in the home and any Act 129 Whole House Program auditor must be Building Performance Institute (“BPI”) Certified as a Building Analyst I Professional.

Understanding that it takes a significant amount of time and effort to obtain training and certification, the Companies’ LIURP contractors were informed in August of 2008 that training and certification would be required by the end of 2009. The Companies assisted with training and certification costs. The Companies chose BPI certification for contractors because it is the nation's premier building performance credentialing, quality assurance, and national standards setting organization. BPI supports the development of a highly professional building

performance industry through individual and organizational credentialing and a rigorous quality assurance program. BPI offers the following:

- Certification of individuals in building analysis, heating, air conditioning/heat pump, shell/envelope, and multi-family designations. New certifications are being developed for air sealing and insulation. Certifications require written verification of knowledge and lab/in-field verification;
- Accreditation of contractors committed to delivering quality, home performance improvements;
- Quality assurance to verify conformance with BPI Standards and feedback for continuing improvement. This component is independent of the program, which maintains a consistent standard across programs, making it superior to other models;
- Affiliation of organizations that deliver BPI services in their market; and
- Open, transparent, and consensus developed national technical standards based on sound building science.

BPI, in cooperation with the building performance industry stakeholders, establishes a professional performance bar at a level appropriate to ensuring the consistent delivery of exceptional building performance services for those entrusting the BPI brand. The BPI national expansion is supported by a grant from the United States Environmental Protection Agency, the United States Department of Energy, and the United States Department of Housing and Urban Development, as well as various regional, state, and local programs.

In addition to BPI certification, the Companies' LIURP agencies and contractors are required to attend company-sponsored energy conservation training programs. Past training topics have included electric bill analysis, combustion safety testing, zonal pressure diagnostics,

mobile home insulation training, cool roof, window tint and cooling reduction training, etc. The Companies also pay for LIURP contractor/agencies' core conference fees for ACI Home Performance national or regional conferences to provide contractors with opportunities to obtain continuing education credits required to maintain BPI certification.

The Companies also provide up to two full days of individual one-on-one weatherization field training for new auditors, crew chiefs and installers by BPI certified trainers. The Companies do not believe additional training and certification is necessary because the LIURP program has been performing exceptionally well and has obtained very respectable energy savings every year. Because of the program's success, the Companies have been asked to share details about the LIURP program with others across the country and Canada.

In addition, the Companies and/or their contracted conservation service provider for approved Act 129 residential programs, Honeywell Utility Solutions, will provide support for BPI training initiatives for the Comprehensive Whole House Program.

B. Training Recommendations.

Beyond the Companies' training efforts, hundreds of contractors across the state have already invested substantial amounts of their own money in BPI training and certification as part of the Pennsylvania Home Energy Program. Another standard would cause confusion, devalue that training effort and place an unreasonable burden on contractors who have demonstrated an interest in participating in this business. If the state weatherization certification was determined to be the only standard, it would have a serious negative impact on the contractor community. A commitment to Pennsylvania weatherization training in time, costs, and lost production results in a non-transferable certification outside of the state. Training and certification programs should be transferable and portable. BPI certification is accepted by many state and national programs.

Training weatherization workers to meet a uniform minimum standard is not the only assurance of work being completed correctly nor does it always produce the expected energy savings. The Companies ensure the highest quality installation and energy savings by employing third-party quality assurance inspectors who are also BPI training instructors. Currently, inspections are conducted on 50 percent of LIURP electric heat homes and 15 percent of LIURP non-electric heat homes. These inspectors also recommend individual training for auditors, crew chiefs or installers where job performance issues have surfaced.

Since the Companies contract with 20 state Weatherization Assistance Program agencies, many contractors have attended the required Pennsylvania Department of Labor and Industry and Department of Community and Economic Development state weatherization training programs and have received the state certifications. Some agencies' staff had already obtained BPI Certification, and this additional training took them and their subcontractors away from productive field work for several days. Some incumbent contractors that have made investments in training may need a day of refresher training to understand the differences in terminology and other minor differences between certifications, but not several days of complete re-training.

In the past, some private contractors' crew members, crew chiefs and auditors have attended training at the state Weatherization Training Center when openings were available. In recent years, these openings have become less available. This is one of the reasons the Companies chose BPI certification for its LIURP program.

The Companies were pleased to learn that additional training facilities are available throughout the state and would look for opportunities to take advantage of no-cost or low-cost training opportunities for *new* LIURP contractors. This may provide for workforce development for emerging technicians and contractors.

C. Impact on LIURP and Act 129 Plans.

The Companies are pleased to provide comments on the impact on LIURP and the impact, from both a cost and programmatic prospective, of any such changes from the EDCs' previously approved Act 129 plans. Due to the cost of certification and backlogs that can be experienced with any training and certification program and the similarities between the two certifications, the Companies would recommend that the state allow either BPI Certification or Pennsylvania State Weatherization Certification.

The increased number of contractors needed to be properly trained to support program growth of WAP, LIURP, Act 129, and ARRA, may place a strain on the expanded state weatherization training network. Pennsylvania needs all available training resources including state weatherization and BPI to meet the demand for quality performance for all programs. The Companies also recommend that contractors who can sufficiently demonstrate their capabilities and knowledge be afforded an opportunity to pass the BPI certification or state weatherization tests without being required to attend training.

The Companies would also recommend that, if any certification is required, contractors be given a minimum of six months to comply. The Companies would recommend that certification only be required for auditors or those making decisions on what measures will be installed in the home. If crew members are supervised and are taking direction from an auditor, certification should be encouraged but not required. Some Act 129 measures and LIURP baseload measures, such as the installation of CFLs, require little training and no certification. The Companies would not recommend a certification for this type of work.

The Companies are unable to comment on the direct training cost of the state weatherization training because the Companies do not have a price schedule for that training.

The Companies have already provided part of the cost of BPI certification and would not recommend any additional certification of LIURP or Act 129 contractors. Regarding the impact on contractor productive time, travel time, etc., the Companies have already seen a decrease in LIURP production due to the required mandatory training for ARRA. This indirect impact to the programs could make it difficult for the company to meet LIURP goals. Any additional training requirement beyond BPI certification for Act 129 could jeopardize attainment of the Companies energy efficiency and conservation plan goals pursuant to Act 129.

III. CONCLUSION

The Companies appreciate the opportunity to provide comments on the Commission's Order seeking comments on the level of training and certification that should be required of residential weatherization installers and auditors employed by EDCs, natural gas distribution companies and their contractors.

Respectfully submitted,

Dated: April 1, 2010



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**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true and correct copy of the foregoing document upon the individuals listed below, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

Service by overnight United Parcel Service, as follows:

James J. McNulty, Secretary
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Service by electronic mail, as follows:

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Dated: April 1, 2010



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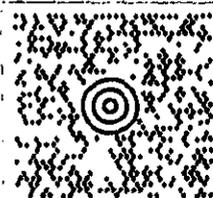
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