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VIA FEDERAL EXPRESS

April 1, 2010

James J. McNulty, Esquire
Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
Harrisburg, Pennsylvania 17120

RECEIVED

APR 1 2010

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

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

Dear Mr. McNulty:

Enclosed for filing on behalf of PPL Electric Utilities Corporation ("PPL Electric" or the "Company") are an original and three (3) copies of the Company's comments regarding Training Certifications for Weatherization Installations and Audits. PPL Electric is filing these comments pursuant to the Commission's order entered on March 2, 2010 at the above-captioned docket.

Pursuant to the Commission's order, the Company has also sent an electronic copy of its comments to Scott Gebhart, David Mick, and Stephanie Wimer.

Pursuant to 52 Pa. Code § 1.11, the enclosed document is to be deemed filed on April 1, 2010, which is the date it was deposited with an overnight express delivery service as shown on the delivery receipt attached to the mailing envelope.

In addition, please date and time-stamp the enclosed extra copy of this letter and return it to me in the envelope provided.

If you have any questions regarding the enclosed comments, please call me or Timothy R. Dahl, Manager-Regulatory Programs & Business Services (484/634-3297).

Very truly yours,

A handwritten signature in black ink that reads "Paul E. Russell".

Paul E. Russell

Enclosures

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**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

APR 1 2010

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

Training Certifications for
Weatherization Installations
and Audits

Docket No. M-2010-2152691

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I. Introduction

On March 2, 2010, the Pennsylvania Public Utility Commission ("Commission" or the "PUC") entered an order at Docket No. M-2010-2152691 requesting comments regarding the current training required by the electric and gas utilities for employees and contractors who conduct weatherization audits and install energy conservation measures. The Commission also seeks comments on the impact, both cost and programmatic, of any such changes from a utility's previously approved Act 129 plan. The Commission notes that workers participating in the state's Weatherization Assistance Program ("WAP") are required to complete specific training. There are three certifications available through the WAP training: installer, crew chief and auditor. The PUC is interested in exploring whether utilities conducting similar weatherization audits would benefit from the same training certifications. Interested parties have 30 days from the entry of this order to submit comments.

PPL Electric Utilities Corporation ("PPL Electric" or the "Company") appreciates the opportunity to provide comments to the Commission. PPL Electric has been providing weatherization services to low-income customers since 1985 through its Winter Relief Assistance Program ("WRAP"), which is the Company's Low-Income Usage Reduction Program ("LIURP"). From 1985 through 2009, the Company has expended approximately \$113 million to install weatherization measures in the homes of

about 64,000 low-income customers. In addition, most of these customers have also received energy conservation education as part of WRAP. PPL Electric's Act 129 weatherization programs for residential customers are ramping up after Commission approval on December 16, 2009 (Docket No. M-2009-2093216) of the Company's amended Energy Efficiency & Conservation Plan.

From PPL Electric's perspective, WRAP has been successful because of an effective partnership involving energy auditors, energy educators, installers, inspectors and Commission's Bureau of Consumer Services. The Company has worked closely with its weatherization partners to ensure a high quality of service regarding energy audits and installation of materials. PPL Electric agrees with the Commission's conclusion that proper weatherization helps customers to reduce energy use and control utility bills.

The Company believes that there is an opportunity to allow LIURP and Act 129 workers who have already received certain types of training or certifications (e.g., Building Performance Institute or "BPI"), or who have extensive experience (five years or more) to continue conducting audits and/or installing weatherization materials without the requirement of additional training. This approach would help control future program costs, maintain productivity, and avoid delays in providing programs and services to customers. PPL Electric recommends that the PUC should balance the need of providing a uniform set of standards against existing processes that are both proven and effective.

II. Training for WRAP Workers

PPL Electric is dedicated to ensuring that WRAP auditors, installers, inspectors and crew chiefs receive the appropriate training, which has included formal classroom sessions, on-the-job experience and participation in conferences and workshops. Some WRAP contractors either arrange for or provide training to their staff. Over the past 25 years, the Company has expanded its training requirements to incorporate new technologies (e.g., blower door and solar water heating) and approaches (e.g., moisture control and carbon monoxide detection). The following information provides a summary of the training received by WRAP auditors, installers and inspectors.

- **WRAP Auditor**

The majority of PPL Electric's LIURP auditors have received training through the Weatherization Training Center in Williamsport, PA. A number of WRAP auditors already have their BPI certification, which requires that participants pass a challenging test. They also must recertify with BPI every three years. Rather than attending a week-long training session, participants can choose to test out in order to receive their BPI certification. Effective September 30, 2010, all full-cost (electric heating) auditors for PPL Electric must have a BPI – Building Analyst I certification. Contractors who received their certification outside of LIURP must provide documentation to PPL Electric. Some auditors and contractors have their RESNET certification as well. The federal government recognizes RESNET standards for verification of a building's energy performance for federal tax credits, for the EPA's

Energy Star program and for DOE's Building America program.¹ Contractors must also attend mandatory PPL Electric-required training sessions as part of their WRAP contracts.

- **WRAP Installer**

Training for installers includes attending educational sessions at the Weatherization Training Center, on-the-job training and PPL Electric-required training sessions. Examples of the Company's training include combustion testing and air sealing and diagnostics. Effective September 30, 2010, all WRAP crew chiefs must obtain their BPI – Building Analyst I certification. A number of crew chiefs already have their BPI certifications. Some WRAP contractors have worked with PPL Electric for over 20 years and have received Residential Conservation Service ("RCS") certifications. CBOs and contractors also establish the training and certification requirements for installers and provide that information to PPL Electric as part of the bidding process for LIURP contracts. In addition, PPL Electric has used staff professionals from the Weatherization Training Center to conduct field evaluations of WRAP installers and provide feedback.

- **WRAP Inspector**

Many WRAP inspectors have received training through the Weatherization Training Center in Williamsport, PA and are required to participate in PPL Electric-sponsored training. Effective September 30, 2010, all full-cost (electric heat) field

¹ RESNET is the Residential Energy Services Network; EPA is the U. S. Environmental Protection Agency; and DOE is the U. S. Department of Energy.

inspectors must obtain their BPI – Building Analyst I certification. A number of inspectors already have their BPI certification.

In addition to the above-described training, PPL Electric sponsors the attendance of WRAP contractors at the annual Affordable Comfort, Inc. ("ACI") conference, which is one of the largest weatherization conferences in the nation. The ACI conference provides detailed technical workshops on various facets of weatherization, from conducting a basic energy audit to reducing air leakage to sophisticated combustion efficiency testing. Participation in these types of national and regional conferences helps augment the WRAP contractors' skills and knowledge. Some WRAP contractors have received certifications to provide specialized training, such as blower door technology and combustion testing.

PPL Electric, in cooperation with the Weatherization Training Center, LIURP contractors and other weatherization experts, has also developed and distributed a comprehensive WRAP Standards & Field Guide. This comprehensive guide provides field procedures and technical direction for WRAP workers specializing in both building shell and home mechanical systems. The Company developed the manual to standardize WRAP field practices.

III. Impact on PPL Electric's Approved Act 129 Plan

The Commission's proposal to require uniform training certifications for weatherization-related work would affect two of PPL Electric's Act 129 programs. The first is the Energy Assessment & Weatherization Program ("EAWP") and the second is the Act 129 Low-Income WRAP. The purpose of EAWP is twofold: 1) provide customers with the opportunity to receive a walk-through energy survey or a

comprehensive energy audit; and 2) encourage customers to weatherize their homes by providing rebates.

For the walk-through energy survey, PPL Electric will rely on a Conservation Service Provider (“CSP”) to conduct a thorough visual inspection of the home to identify opportunities for saving energy. The CSP will provide customers with an electronically-generated energy survey report that includes recommendations for appropriate follow-up activities. For the delivery of a comprehensive energy audit, PPL Electric will use an existing network of BPI-trained and certified energy auditors. To participate, auditors must meet specific qualification criteria (e.g., BPI-certified or Comfort Home, Inc. whole-house assessment training) and perform specific minimum diagnostic tests, such as blower door and duct blaster training.

To deliver Act 129 Low-Income WRAP, the Company is using the same CBOs and contractors that currently participate in LIURP WRAP. This approach helped to ensure a timely delivery of Act 129 Low-Income WRAP because the infrastructure was already in place. It also minimizes customer confusion and avoids creating “competing” programs. Although there are some slight differences between the two low-income weatherization programs (e.g., the income guidelines are lower for Act 129), the types of measures provided are practically identical. The Act 129 Low-Income WRAP auditors, installers and inspectors have received the same training described above for LIURP WRAP.

IV. Concerns and Recommendations

As noted above, PPL Electric agrees with the Commission’s observation that effective weatherization (i.e., proper installation of measures) can help to reduce

energy bills for residential customers. The Company believes that energy education also plays a role because consumer behavior can have a significant effect on energy usage. Providing quality weatherization services to low-income households across the Commonwealth is an admirable public policy objective. PPL Electric's concerns and recommendations regarding the Commission's interest in establishing a uniform set of standards and certifications appear below.

- **Concerns**

PPL Electric's primary concerns include the following:

1. The Company would not want to see a requirement whereby existing LIURP and Act 129 Low-Income WRAP auditors, installers and crew chiefs would have to receive additional training through one of the seven Pennsylvania Department of Labor & Industry-funded ("L & I") training centers. If auditors, installers and crew chiefs already have received specific training, have achieved BPI certifications, have extensive on-the-job experience, and have produced cost-effective and high quality work, then the Company believes that is unnecessary to require these workers to participate in additional training offered through L & I.
2. Requiring existing LIURP or Act 129 Low-Income WRAP weatherization workers to participate in L & I training could also affect productivity. In 2010, PPL Electric has more than doubled its weatherization budget for low-income customers to over \$16 million -- \$7.75 million for LIURP WRAP and \$8.6 million for Act 129 WRAP.

The Company is using the same CBOs and contractors to implement both programs. A number of them also install weatherization measures for WAP. Clearly, these organizations have challenging production goals for 2010 and beyond.

3. Another concern is the availability and capability of the L & I weatherization training centers to absorb an influx of LIURP workers and provide training in a timely manner. There are literally hundreds of existing LIURP auditors, installers and crew chiefs across the state.
4. A longer term concern involves what happens to the L & I weatherization training centers when they exhaust the federal stimulus dollars? Will DCED have access to federal or state dollars to continue funding these centers? Will the Commission require electric and gas utilities to use ratepayer dollars to fund the training centers? In addition, will there be a need to identify and train as many weatherization workers after the federal dollars disappear?
5. The Company does not believe that additional training would benefit its Act 129 EAWP. The benefit-cost ratio for this program is already a relatively low. Increasing the cost of that program would likely decrease the benefit-cost ratio even further. PPL Electric also has concerns if additional training included HERS² certification, which is more applicable to new construction than to existing homes. PPL Electric does not want to implement actions (i.e., increase audit costs)

² HERS stands for Home Energy Rating System.

that would discourage customers from participating in EAWP and/or reduce the cost-effectiveness of the program.

6. A final concern involves the definition of a certified weatherization worker. Does participation in the L & I training program make an auditor, installer or crew chief more qualified or competent than training received through the Weatherization Training Center or BPI certification program? If so, does this lead to additional energy savings, increased productivity or higher quality work? What makes the L & I training more effective than the training received by weatherization workers through respected and well-established organizations or programs? What was the standard used to determine that L & I training is more effective? Who will determine the uniform set of standards to qualify weatherization workers?

- **Recommendations**

PPL Electric's recommendations for the Commission's consideration are as follows:

1. Allow existing LIURP and Act 129 WRAP weatherization workers to continue their delivery of services (i.e., auditors, installation of measures and inspections) to low-income households without requiring additional training.
2. Give new auditors, installers and crew chiefs for LIURP or Act 129 WRAP the option of participating in either the L & I training or receiving their BPI certification or other appropriate training through utilities'

existing procedures. Utilities will base this determination on the timing and availability of training and the type of training needed. Continue to allow workers the flexibility to test out rather than attend formal training sessions.

3. Establish a PUC working group of interested parties and experts to explore the feasibility and necessity of having uniform minimum standard of training for WAP, LIURP and Act 129 WRAP weatherization workers.
4. Allow electric distribution companies to determine the appropriate certification and training for their Act 129 non-low-income weatherization programs based on cost effectiveness, program funding, energy savings, customer preferences and other factors.

V. Conclusion

PPL Electric appreciates the opportunity to provide comments regarding training requirements for LIURP and Act 129 WRAP workers and whether these programs would benefit from the same training certifications provided to WAP workers through the L&I training centers. The effective and timely delivery of weatherization services will help low-income households to better manage their energy usage. PPL Electric actively supports high-quality installations of weatherization measures in order to achieve energy reduction and to improve living comfort. The Company stands ready to work collaboratively with the Commission and other parties on this important issue.

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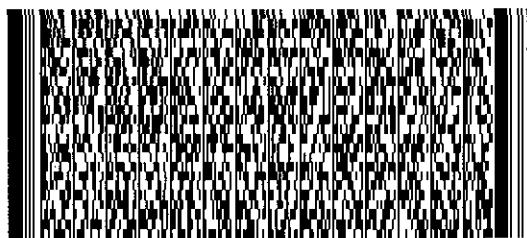
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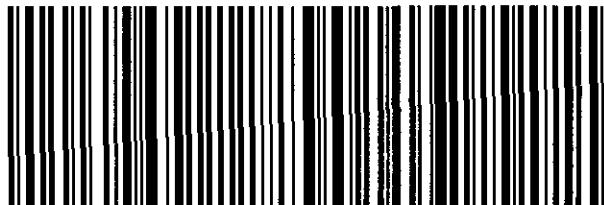
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