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April 21, 2010

James McNulty, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
Attn: Secretary's Bureau
2ndFloor, Room-N201
P.O. Box 3265
Harrisburg, PA 17105-3265

Re: Reply Comments on **Training Certifications for
Weatherization Installations and Audits**
Training - Docket # M-2010-2152691

Dear Secretary McNulty:

The Pennsylvania Departments of Labor and Industry and Community and Economic Development (Departments) respectfully submits the following reply comments to those filed in this proceeding. The Departments would like to thank the Commission for opening this proceeding and providing a forum for all parties to exchange ideas on this critical subject.

Need Remains for State-wide Training and Workforce Certification

As Department of Environmental Protection (DEP) correctly points out "*establishing a uniform set of nationally recognized credentialing criteria for workers employed in residential energy efficiency and conservation services will improve the quality and performance of installed measures, reduce the cost for contractor training, help validate energy savings and thus increase participation and uptake of energy efficiency and conservation programs*". The Office of Consumer Advocate also states "*uniform, state-wide training could help to ensure that the work will produce the expected energy savings and benefits under Act 129 of 2008 and each EDC's individual Energy efficiency and Conservation Plan*". The Energy Coordinating Agency "*fully supports the Pennsylvania Public Utility Commission's proposed requirement to establish a uniform set of training standards for all energy efficiency auditors and installers, whether employed directly by electric and natural gas utilities or by their contractors and subcontractors and to make those Standards consistent with those developed by the PA Department of Labor and Industry for the Weatherization Assistance Program*". These comments and others support the continued need for state-wide training and workforce certification.

Pennsylvania Weatherization Training Plan Meets the Need

The Departments committed in the American Recovery and Reinvestment Act (ARRA) weatherization plan to develop a program to ensure that weatherization in Pennsylvania is performed correctly and safely by workers that have completed proper training. It was required that all employees that perform WAP weatherization work on homes be certified using a uniform set of standards. These standards are comprised of the knowledge and skill sets demanded by the weatherization providers and incorporate Pennsylvania building codes. This ensures that the work is done safely, correctly, and to the satisfaction of the homeowner while meeting targeted efficiencies on energy usage.

ARRA funds were used to create Pennsylvania's comprehensive training and work force certification because the Departments found that no nationally recognized credentialing criteria existed for all job duties necessary to perform weatherization – installer, crew chief, and auditor. Pennsylvania did not create these standards when designing its curriculum but applied what was available on a State and national level to satisfy the demands of the industry, homeowner, and regulatory bodies. The State's curriculum relies on best practices from Penn College of Technology's Weatherization Training Center (WTC) and its twenty plus years experience in weatherization training. The WTC curriculum was developed using public funds and has been amended over the years to reflect advances in technology, home construction, application, and safety. As such, it remains pliable to accommodate ongoing advancements in energy efficiency techniques and materials.

Comments Supporting the Need for Standardization

While it is possible that national certification and standards for weatherization training and certification be released as soon as September 30, 2010, federal efforts are often delayed. The Departments believe that Pennsylvania and the Public Utility Commission (PUC) can not afford to wait and recommend that the PUC move forward and require workers performing energy efficiency and weatherization work with utility funds to have Pennsylvania worker certification. Establishing a set of uniform standards that meet the demands of the industry, Pennsylvania building codes, and the expectations of homeowners will ensure that the work is done safely, correctly, and to the satisfaction of all involved. Pennsylvania should adopt or align with the national standard once they are announced.

Comments by DEP also support the need for standardization. DEP states *"A common standard for work related to residential efficiency has many benefits as indicated above. Establishing that standard is achievable and is consistent with the policy direction in a number of states. Many states require licensing of residential contractors and have standards for energy efficiency and renovation work in order to assure some level of consumer protection. Currently, while Pennsylvania registers contractors, there are no defined standards for competency in residential energy auditing, audit protocols, installation standards for Energy Conservation Measures ("ECMs"), reporting of ECM efficacy or verification of energy savings. This overall lack of uniformity confuses consumers in search of good results, enhances concerns about credibility and the inability to achieve program goals. Further there is no alignment between the activities of the electric and gas utility companies, the WAP providers, or private service providers. This makes it difficult, if not impossible, to identify*

and quantify energy- and cost-effectiveness of installed measures.” Energy Coordination Agency comments “The benefits from statewide standardization of training are very significant and will increase the quality of work performed, the level of energy savings achieved, the number of energy efficiency jobs created, the workers' professionalism and eventually, the strength and size of the clean energy workforce in Pennsylvania. By developing a high, uniform standard to which all residential energy conservation technicians must adhere, all the following benefits will flow”.

Building Performance Institute Certification is Currently Inadequate for Weatherization and Energy Efficiency

As stated in their comments, the Departments via the Application Review Committee take into consideration other industry-recognized credentials as an equivalency toward State Certification including the Building Performance Institute’s Building Analyst (BPI-BA). While much national and state attention has been placed on the BPI-BA certificate, the State determined that BPI’s credentialing standards, as a stand alone certification, did not adequately address certain aspects of Pennsylvania’s weatherization program including the broad field of energy efficient retrofits, specifics on base load measures and heating systems, decision making tools, installation standards and quality control, criteria for furnace replacement, and work scope development. Also, BPI-BA training is inadequate in terms of preparing an inexperienced person for the broad categories of skills needed in the weatherization programs. This gap in skills was the basis for the Departments determining that the BPI-BA designation was sufficient as a value-add to its certification and is best used as a complement to the State’s competency based training.

Many filed comments have recognized that BPI is currently inadequate for weatherization and energy efficiency. Comments from Affordable Comfort Inc. *“recognizes that some shortcomings exist in both WAP, BPI, and RESNET standards development and trainings. Until the advent of ARRA funding, standards development and trainer preparation and requirements for qualifying curriculum and training programs have been significantly underfunded”.* Pa Home Energy pointed out that *“The US Department of Energy, the US Department of Housing and Urban Development, and the US Environmental Protection Agency are working on the creation and/or adoption of a common national standard that is expected by September 30, 2010”.* Finally, this fact is recognized in BPI comments where they state *“Effective today, BPI is launching new certifications for air sealing and insulation installers and crew chiefs. These certifications are in a pilot phase with five BPI Affiliate organizations in early April 2010 and a national roll-out of these certifications will be made at the national Affordable Comfort conference in Austin, TX on April 20.”*

Pennsylvania’s weatherization curriculum has been criticized not on technical merit but on its focus to specifics concerning the publicly-funded weatherization program. To this end, the Departments look forward to working with the national certifying bodies and the public utilities to broaden the application of its curriculum to include the weatherization of all homes in Pennsylvania.

Create Stakeholder Working Group

Comments have been filed with recommendations on how the PUC should move forward. Those that the Departments support include ACI's recommendation that *"a stakeholder working group be established immediately to investigate and address the gaps in the training and certifications to improve training plans to be comprehensive and compliant with national standards. The working group should include, but not be limited to, representatives from State agencies such as the PUC, DCED, L and I, and the DEP; the home performance contractor network; WAP subgrantee organizations, utility companies and their Act 129 contractors, the WTC instructors, union-based trainers, community colleges, and residential energy efficiency advocacy organizations such as ACI, Efficiency First, and the Keystone Energy Efficiency Alliance"* and comments from the Keystone Energy Efficiency Alliance(KEEA) which 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"*. The Departments agree with these recommendations and urge the Commission to commence with these stakeholder meetings.

Conclusion

Pennsylvania has an infrastructure of local training providers in place to offer weatherization courses to incumbent workers and candidates looking to get into weatherization. Sufficient capacity exists within this system to include workers funded by PUC programs. This infrastructure was created to address the void in uniform training and certification standards across the industry. To suggest that Pennsylvania not require certification or ask that the industry and homeowners wait months or years for DOE to release its standards is a delay Pennsylvania can ill afford to participate in. Therefore, the Departments recommend that the PUC move forward with Docket No. M-2010-2152691 Training Certifications for Weatherization Installations and Audits and require workers performing weatherization and energy efficiency work with utility funds attain the Pennsylvania certification.

Respectively Submitted,



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