

COMMONWEALTH OF PENNSYLVANIA



OFFICE OF CONSUMER ADVOCATE

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IRWINA. POPOWSKY  
Consumer Advocate

April 1, 2010

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

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

Dear Secretary McNulty:

Enclosed for filing are Comments of the Office of Consumer Advocate, in the above-referenced proceeding.

Should you have any questions, please contact our office at the number above.

Respectfully Submitted,

A handwritten signature in cursive script that reads "Jennedy S. Johnson".

Jennedy S. Johnson  
Assistant Consumer Advocate  
PA Attorney I.D. # 203098

Enclosure

cc: Scott Gebhardt, Energy Program Specialist – vial electronic only  
David Mick, Supervisor-Energy Policy and Compliance – vial electronic only  
Stephanie Wimer, Assistant Counsel – vial electronic only

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BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

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

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COMMENTS  
OF THE  
OFFICE OF CONSUMER ADVOCATE

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I. INTRODUCTION

The Office of Consumer Advocate (OCA) is filing these Comments in accordance with the Order in the above-captioned docket entered on March 2, 2010. These Comments are in response to the Commission's request regarding the need for a uniform set of standards to train weatherization, energy efficiency and retrofit workers. The OCA submits that to the extent that training is available and not already a requirement for contractors operating Electric Distribution Company (EDC) and Natural Gas Distribution Company (NGDC) LIURP programs, the Commission should consider uniform training to help ensure that utility customers, state-wide, will receive service that is properly performed and consistently provided throughout the Commonwealth. Additionally, 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 (EE&C Plan).

## II. COMMENTS

The OCA submits that the establishment of a uniform set of minimum standards to train weatherization, energy efficiency and retrofit workers should be considered by the Commission. As the Commission notes in its Order, workers participating in the Weatherization Assistance Program (WAP) through the Department of Community and Economic Development (DCED) are required to complete specific training. The OCA submits that this training, and its accompanying certifications, should be considered for all utility sponsored weatherization, energy efficiency or retrofit projects under the LIURP program or the Company's Act 129 mandated EE&C Plan.

The OCA supports the Commission's efforts to obtain information, through these comments, on the cost impacts of establishing a uniform, state-wide training protocol consistent with the DCED and Department of Labor initiative. While such state-wide training may have been cost prohibitive in the past, the expansion of DCED training state-wide, as well as the increase in programs to achieve Act 129 mandates, may lead to more cost effective training options. Indeed, while just a year or so ago, the availability of such training was limited, George E. Cornelius, Secretary for DCED, recently testified before the Consumer Affairs Committee and addressed the expansion of such training programs. Secretary Cornelius testified that the DCED and the Department of Labor and Industry (L&I) developed a partnership to provide weatherization program training opportunities throughout the Commonwealth so that residents from all regions have access to training, including opening six new geographically-distributed training centers. He went on to address the training itself:

The program still requires training standards for all weatherization employees. Once met, the worker receives a state-issued certification showing that this work has demonstrated the appropriate level of knowledge and skills respective to their

category—Installer, Crew Chief, or Auditor. Certification standards have also been established for workers currently providing weatherization services. Experienced weatherization workers have the option to demonstrate their competency in mandatory skill areas through a test-out process. To date, the Application Review Committee has reviewed over 675 incumbent worker applications with 242 receiving immediate certifications.

Testimony of Secretary George E. Cornelius of the Department of Community and Economic Development to the House Consumer Affairs Committee, March 11, 2010. Secretary Cornelius also addressed the natural link between the WAP and the EE&C plans in his testimony:

Recognizing that Pennsylvania's regulated utilities are required to spend over a billion dollars to reduce energy consumption under Act 129, DCED is now coordinating extensively with the PUC. Coordination will ensure that utilities appropriately partner with weatherization agencies to reduce energy consumption in the households targeted by this program [WAP].

Id.

The OCA submits that with the availability of state-wide training programs, further consideration should be given to requiring all utility employees and contractors performing weatherization, auditing, energy efficiency and retrofitting tasks under the Company's EE&C Plan or LIURP program to become certified through a uniform training process. Uniform training can help to ensure that utility customers, state-wide, will receive service that is properly and consistently performed. Additionally, uniform, state-wide training may also ensure that the work will produce the expected energy savings and benefits under Act 129 of 2008 and each EDC's individual EE&C Plan.

The OCA submits utility customers can benefit from EDC and NGDC employees and contractors receiving uniform training and certification and could also benefit from better coordination of EDC, NGDC and DCED programs.

III. CONCLUSION

The OCA appreciates this opportunity to provide Comments on this important topic. The OCA supports the Commission's efforts to consider the implementation of a uniform set of standards to train weatherization, energy efficiency and retrofit workers.

Respectfully Submitted,



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Dated: April 1, 2010  
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