

LEGAL SERVICES



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VIA FEDEX NEXT DAY

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
Installation and Audits at Docket No. M-2010-2152691**

Dear Secretary McNulty:

West Penn Power Company d/b/a Allegheny Power appreciates the opportunity to review and provide comments on Training Certifications for Weatherization Installations and Audits.

This filing is filed by FedEx Next Day delivery and electronically and is deemed filed today.

Very truly yours,


John L. Munsch
Attorney

JLM:sac

Enclosures

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accurate weatherization services under the Company's LIURP program. The Company also requires its audit contractors to be certified by the Building Performance Institute. The Company believes that the standards are appropriate for services provided under its weatherization and audit programs.

While the Company believes that uniform standards of training are beneficial in relation to the services provided to customers, the Company has concerns related to the additional cost of providing programs to customers and the potential shortage of trained contractors. To the extent that additional training is required the cost to Allegheny Power to provide these services and programs will likewise increase. Any additional cost to the Company is a concern because any cost increase will affect the ability of the Company to provide EE&C programs to customers.

With respect to new training requirements, to the extent that the Company's contractors require additional training to meet new requirements, or to the extent the Company needs to employ additional contractors to provide the programs, any training or scheduling restrictions could restrict the ability of the Company or state and/or county offices to have a sufficient number of contractors to provide the programs to customers and impact the ability of the Company to meet all objectives and requirements of its LIURP and Act 129 EE&C plan and programs.

Allegheny Power appreciates the opportunity to provide Comments concerning Training Certifications for Weatherization Installations and Audits. The Company believes that its current requirements are appropriate for the services provided. While the Company also believes that standardized uniform training is beneficial for the services provided, the Company expresses

concern about additional cost of training as well as the availability of the a skilled workforce to continue to provide weatherization and audit services in a timely manner

Respectfully submitted,

Date: April 1, 2010



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