



BUILDING
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***Raising the Bar
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March 31, 2010

Pennsylvania Public Utility Commission
Secretary James J. McNulty
P.S. Box 3265
Harrisburg, PA 17105-3265

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

Dear Secretary McNulty:

The Building Performance Institute, Inc. (BPI), the nation's premier building performance credentialing, quality assurance, and national standards setting organization, is pleased to provide comments on the order for Training Certifications for Weatherization Installations in Pennsylvania.

BPI is over a decade old and was founded in the weatherization community through the efforts of leaders in such states as Indiana, Ohio, and New York and now serving weatherization and Home Performance with ENERGY STAR (HPwES) programs across the country. Its national expansion over the past three years was funded through a grant from DOE, EPA, and HUD, with financial support from states.

BPI works especially closely with DOE in its national standards development activities; we look forward to initiating a similar close working relationship with the Pennsylvania Department of Labor and Industry and the Department of Community and Economic Development in aligning standards and certification activities at the national and state levels. We recognize that all WAP auditors in PA must be trained and certified Building Performance Institute (BPI) Building Analysts by July 2011. 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.

It is especially important that the certifications held by weatherization and home performance technicians be transportable across state borders and to avoid isolating training and certification activities in one state from the national efforts underway.

Today, BPI develops nationally recognized standards relating to the assessment and energy performance retrofit of the nation's housing stock both for the weatherization community and for residential energy retrofit work in general. Changes to these standards are made through a consensus process led by BPI's external Standards Technical Committee (STC), an eleven person committee with two members from DOE's national laboratory system, with process oversight by the five person BPI Standards Management Board (SMB). DOE is represented on the BPI SMB. Coupled to these standards are a series of professional certification credentials which entail both an extensive written test and a two hour field diagnostic exam in order to achieve certification. BPI



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maintains standards and professional certifications in both the single family and multi-family markets.

BPI's standards domain includes personnel certifications, contractor accreditations, and national technical standards that support building systems. Since 1996 BPI has used its consensus development processes to garner wide support of all potentially affected stakeholders. These procedures exceed those required by the American National Standards Institute (ANSI). In fact, BPI has applied to ANSI for accreditation as a developer of American National Standards and approval is expected shortly. BPI's standards development processes already comport to all of the tenets of OMB Circular A-119, particularly those of openness, due process, balance, consensus, and lack of dominance. Thus, BPI is appropriately poised for this legislation and its reliance on private-sector, objective, fair, open and consensus based standards. It fully meets the requirements of OMB Circular A-119.

BPI reviews the curricula developed by training organizations across the country to ensure that they align with BPI standards. Organizations seeking to have their trainees challenge BPI's certification exams affiliate with BPI. BPI conducts an alignment evaluation of the curriculum of its Affiliate organizations with its standards and exams. BPI maintains a Knowledge Essential Task List (KETL) which aligns with the WAP "Core Competencies" document. In fact, eight of the twelve DOE National Weatherization Training Centers have become BPI Affiliate organizations BPI's Affiliate network began approximately eight years ago with five weatherization based training centers across the country. These centers have been providing comprehensive training to weatherization staff for many years. There are currently approximately 164 BPI Affiliate organizations across the country and these would be especially appropriate for consideration for the expansion of the DOE National Weatherization Training Centers network. Another 40 organizations are in the process of becoming BPI Affiliate organizations.

While BPI was formed as a 501 (c) (3) non-profit organization in 1996, it did not develop standards and begin offering certification exams industry-wide until 2001. The table below provides the number of new and renewal certifications awarded by BPI by year starting in 2001. Cumulative total active certifications in the marketplace are also provided.

| BPI CERTIFICATIONS BY YEAR | | |
|-----------------------------------|--------------|-----------------------------|
| Year | New | Cumulative in Market |
| 2001 | 594 | 594 |
| 2002 | 526 | 1,120 |
| 2003 | 352 | 1,472 |
| 2004 | 96 | 1,568 |
| 2005 | 347 | 1,915 |
| 2006 | 812 | 2,727 |
| 2007 | 606 | 3,333 |
| 2008 | 1,243 | 4,576 |
| 2009 | 4,127 | 8,703 |
| Total | 8,703 | |



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The following chart provides the number of active BPI certifications by state along with a listing of sponsoring state or utility programs. There are now 471 BPI Certified technicians in Pennsylvania effective February 2010.

| State | Number of Active Certifications | Participating State/Utility Programs |
|----------------------|---------------------------------|--|
| Alabama | 16 | |
| Alaska | 38 | Alaska Housing Finance Agency |
| Arizona | 202 | Arizona Energy Office |
| Arkansas | 5 | |
| California | 189 | SMUD, PG&E, SCE, Workforce Investment Board |
| Colorado | 110 | Gov. Energy Office, Xcel Energy, City of Aspen |
| Connecticut | 215 | Workforce Investment Board |
| Delaware | 24 | DE DNR, DE Technical and Community College |
| District of Columbia | 10 | |
| Florida | 14 | Gainesville Regional Utilities |
| Georgia | 93 | Georgia Power, Jackson EMC |
| Idaho | 9 | |
| Illinois | 118 | Tri-county Labor-Management Council |
| Indiana | 363 | Indiana Community Action Agency |
| Iowa | 5 | |
| Kansas | 37 | Kansas Building Science Institute |
| Kentucky | 20 | |
| Louisiana | 6 | |
| Maine | 109 | Efficiency Maine/ME PUC |
| Maryland | 194 | MD Energy Administration, BG&E, Pepco |
| Massachusetts | 197 | National Grid, Workforce Investment Board |
| Michigan | 171 | State of Michigan |
| Minnesota | 19 | |
| Mississippi | 2 | |
| Missouri | 165 | MO DNR, Columbia Water & Light, |
| Montana | 14 | |
| Nebraska | 1 | |
| Nevada | 63 | Workforce Investment Board |
| New Hampshire | 131 | NH HPWES |
| New Jersey | 911 | New Jersey Board of Public Utilities |
| New Mexico | 11 | |
| New York | 2445 | NYSERDA, LIPA |
| North Carolina | 203 | State Board of Community Colleges |
| Ohio | 175 | Corporation for Ohio Appalachian Development |
| Oklahoma | 2 | |
| Oregon | 340 | Energy Trust of Oregon |
| Pennsylvania | 471 | West Penn Power, EnergyWisePA/Dept. of Envir. Protection |
| Rhode Island | 55 | RICC/Workforce and Community Education |
| South Carolina | 83 | SC Community College System |
| South Dakota | 1 | |
| Tennessee | 24 | Tennessee Valley Authority |
| Texas | 376 | Austin Energy, Oncor |
| Utah | 3 | |
| Vermont | 272 | Efficiency Vermont/Vermont Energy Investment Corp. |
| Virginia | 91 | VA Sustainable Bldg. Network |
| Washington | 211 | Opportunity Council/Building Performance Council |
| West Virginia | 9 | Workforce Investment Board |
| Wisconsin | 30 | WI Energy Conservation Corporation |
| Wyoming | 17 | Wyoming Energy Council |
| Total | 8270 | |



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The principle concerns that BPI sees in the commission's ruling include:

- Potential disruption to established HPwES programs in PA that currently point to BPI and RESNET standards and certifications.
- Minimization of the role of the established community college and private sector training services in the state that deliver energy efficiency training to the BPI and RESNET standards.
- Added time and cost burden to contractors already trained and certified under other programs in the state to conform to a new set of standards and certifications.
- Potential isolation of PA standards and certification activities from national standards development and such legislation as HOME STAR.
- While the building science relating to WAP projects and private-sector projects is essentially the same, the business models are not as WAP delivers energy efficiency improvements paid for entirely by the government while private sector contractors deliver services selected by their paying customers.

We look forward to the opportunity to work closely with the PUC in advancing the training and certification of energy retrofit workers to a set of consistent and national standards.

Sincerely,

Larry Zarker
Chief Executive Officer