

PERFORMANCE SYSTEMS

DEVELOPMENT

Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
Harrisburg, Pennsylvania 17120

March 28, 2010

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

Performance Systems Development (PSD) would like to thank the Pennsylvania Public Utility Commission (PUC) for taking the time to consider public comments on the level of training and certification that should be required of residential weatherization installers and auditors employed by energy distribution companies and their subcontractors. PSD is a company that has been engaged for over ten years in market transformation for energy efficiency services (www.PSDconsulting.com). PSD is also the implementer of PA Home Energy (www.PAHomeEnergy.org) which is a program focused on creating market demand for energy efficiency services, while training contractors to do comprehensive "energy audits" and all the energy efficiency work that ensues as a result of this whole-house analysis.

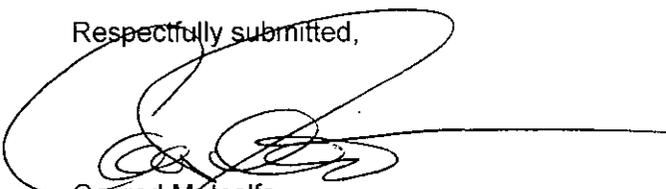
PSD has been working across Pennsylvania to set and maintain high standards for this training and certification. We are collaborating with a wide variety of organizations and companies that have invested significant time and expense on training to the national certification standards designated by the Building Performance Institute (BPI) and the Residential Energy Services Network (RESNET).

We have been working with housing-focused government organizations (like Philadelphia Housing Authority, Pennsylvania Housing Finance Agency, SEDA-COG). We have been working with educational institutions (like Penn State, Lehigh-Carbon Community College, Harrisburg Area Community College). And we have been working with businesses (like UGI Energy Services, MaGrann Associates, Conservation Consultants). Moreover, we have helped to create over 150 small growing businesses that are new to this market, now offering energy efficiency services - and hiring employees for "green collar" jobs.

Many of these businesses have made significant progress in adopting these business models, and have made large investments in the national BPI and RESNET certifications. Significant marketing resources have been expended to educate consumers about BPI and RESNET, and these consumers will be confused by the multiple certification levels. Market growth and workforce development will be stalled while contractors decide if they can afford to put further investment dollars into additional training. With new national standards in effect, Pennsylvania contractors will be out of sync with the standards of other states, and the upcoming national programs that are being designed to address these issues.

Pennsylvania is currently third in the nation with regards to the number of clean energy jobs, and we would like to see this position maintained. We urge you not to interrupt the momentum that has been created by market development efforts in these areas.

Respectfully submitted,


Conrad Metcalfe
VP Operations & Training
Performance Systems Development

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