



**Duquesne Light**  
Our Energy...Your Power

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**Erin H. Creahan**  
Senior Attorney

April 1, 2010

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**VIA OVERNIGHT MAIL**

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

**PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU**

**Re: Training Certifications for Weatherization Installations and Audits**  
**Docket No: M-2010-2152691**

Dear Secretary McNulty:

Enclosed please find an original and three (3) copies of Duquesne Light Company's Comments in response to the Commission's March 2, 2010 Order on Training Certifications for Weatherization Installations and Audits.

Per the Commission's Order, this is also being electronically mailed to Scott Gebhardt, David Mick, and Stephanie Wimer. If you have any questions, please contact me.

Sincerely yours,

Erin H. Creahan  
Senior Attorney

Enclosures

cc: Scott Gebhardt, David Mick, and Stephanie Wimer (via electronic mail)

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**Re: Training Certifications for** : **Docket No. M-2010-2152691**  
**Weatherization Installations** :  
**And Audits** :

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**COMMENTS OF  
DUQUESNE LIGHT COMPANY**

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PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

**I. Introduction**

The Pennsylvania Public Utility Commission issued an Order on March 2, 2010 with respect to *Training Certifications for Weatherization Installations and Audits* (“Order”), Docket No. M-2010-2152691. Pursuant to this Order, in a desire to develop a uniform minimum standard for training of weatherization workers, the Commission seeks comment on the level of training and certification that should be required of residential weatherization installers and auditors employed by electric distribution companies (EDC), natural gas distribution companies (NGDC) and their contractors. More specifically, the Commission seeks comments on “the current training required by electric and gas utilities of their employees and contractors who conduct weatherization installations and audits, as well as the impact on the companies’ Low Income Usage Reduction Program (LIURP). The Commission also seeks comments on the impact, from both a cost and programmatic prospective, of any such changes from a utility’s previously approved EDC Act 129 plan.” Order, pps. 1, 5.

Duquesne Light Company (“Duquesne Light”) submits the following comments in response to the Order. Duquesne Light supports the comments filed by the Energy

Association of Pennsylvania ("EAPA") and provides further comments on the Order as discussed in more detail below.

## **II. Comments**

### **A. Training Required By Duquesne Light Of Its Contractors That Conduct Weatherization Installations And Audits**

With respect to its LIURP ("Smart Comfort") program, Duquesne Light does not utilize its employees to conduct weatherization installations and audits; rather, after conducting a competitive RFP process, it contracted with Conservation Consultants, Inc. ("CCI") to administer its Smart Comfort program, including weatherization installations and audits.<sup>1</sup>

The training programs and requirements for weatherization workers are not administered or dictated by Duquesne Light, and Duquesne Light does not require a specific level of training in its LIURP contracts with vendors; rather, in contracting with a third party to administer its Smart Comfort program, Duquesne Light evaluates the training programs of the interested companies as part of evaluating each proposal. RESNET (Residential Energy Services Network) and BPI (Building Performance Institute) are two of the types of training that Duquesne Light looks for, but examines each company's training program as a whole. The training required is based upon the requirements of the contractor selected, and differs depending on the type of work the contractor performs.

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<sup>1</sup> CCI is a non-profit organization with a mission of responsible energy use. CCI has been in existence for 32 years, and has been involved with the Duquesne Light Smart Comfort program since its inception. CCI works with every major regulated utility in Western Pennsylvania. CCI manages all aspects of the Smart Comfort program, including solicitation of customers, verification of income eligibility, enrollment of participants, monitoring of customer accounts, etc. CCI employs Energy Managers capable of delivering the program's services, including analysis of electric usage patterns, electric use audits, energy conservation education, knowledge of steps to reduce usage, as well as conservation measures.

Through CCI, the training for weatherization workers differs depending on whether the particular contractor is responsible for Electric Baseload requirements versus Electric Heating requirements, but in both cases, extensive and industry appropriate training is required. All contractors charged with administering the Smart Comfort program must reach and maintain a demonstrated level of technical competence in the hardware, software and communications technologies employed by the program. Baseload auditors receive two weeks of academic training by CCI senior staff, followed by several in-the-field experiences. All Baseload auditors attend training and receive certifications from the Penn College of Technology at Williamsport. These courses include: Advanced Diagnostic Approaches to Weatherization; Diagnostics Approaches to Weatherization; Introduction to Residential Heat Systems; Basic Residential Electricity; and Weatherization Tactics. Heating auditors require more extensive training, and as a result, have been certified as BPI and RESNET, and have been qualified as trainers for ARRA WAP (American Reinvestment and Recovery Act Pennsylvania Weatherization Program). These auditors are used to audit all electric homes or multi-family residences where additional skills are warranted. The weatherization crews utilized by CCI, and subsequently Duquesne Light, have completed the ARRA WAP training and certifications, which has resulted in extremely efficient, effective, and consistent weatherization procedures. All of the training described above is a supplement to the education that the responsible individuals have received from Universities and Technical Schools in related fields.

With respect to its Act 129 Program, when Duquesne Light reaches the point where it is providing weatherization services, it will contract with qualified parties to

administer such services for low income customers, as opposed to utilizing employees to conduct weatherization installations and audits. In evaluating contractors to perform such services, Duquesne Light will require that auditors be BPI and/or RESNET certified. With non-low income customers, customers will have the ability to choose any vendor that they want to perform weatherization services. Thus, through contracts, Duquesne Light will require that customers utilize only qualified and well-trained vendors.

**B. The Impact Of Weatherization Training On Duquesne Light's Smart Comfort/ LIURP Program**

Current weatherization training enhances Duquesne Light's Smart Comfort/ LIURP Program, as such training ensures that high quality and skilled workers are performing weatherization services. However, current weatherization training has a very limited financial impact on Duquesne Light's Smart Comfort/ LIURP Program. Duquesne Light does not pay for the initial training for its contractors, as when it is selecting contractors to assist with the Smart Comfort/ LIURP program, it looks for skilled professionals that have the requisite high-level training. There are two exceptions to this rule, however: Duquesne Light's LIURP program does pay for any courses taken by its contractors at the Penn College of Technology; also, Duquesne Light is responsible for any updates to contractor certifications.

**C. The Impact Of Weatherization Training, From Both A Cost And Programmatic Perspective, Of Any Such Changes From Duquesne Light's Previously Approved Act 129 Plan**

Without knowing for certain what the standardized training program will include, it is difficult to provide final comment on the effect of such training, from both a programmatic and cost perspective, on Duquesne Light's Act 129 Plan. However, it

appears that there will be no drastic effect upon Duquesne Light's Act 129 Plan, as Duquesne Light contracts with vendors who are responsible for the training (physically and financially). Thus, a standardized training program should not have much of an effect on Duquesne Light's Act 129 Plan, with the exception that it needs to be a high quality training program, as Duquesne Light needs to ensure that weatherization workers are adequately trained; if the standardized program does not include the proper training, it may ultimately have cost or programmatic impacts upon Duquesne Light's Act 129 Plan, as Duquesne Light will be forced to bear the cost of increased training requirements in order to ensure that it has access to high quality weatherization workers.

### III. Conclusion

Duquesne Light appreciates that it was given the opportunity to comment on this matter.

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Respectfully Submitted,



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Dated: April 1, 2010

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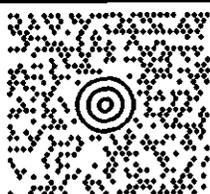
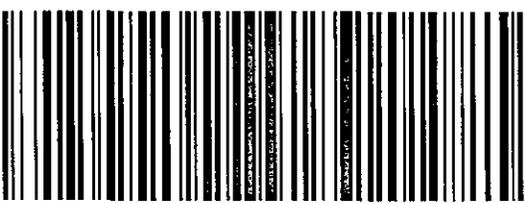
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