



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF AIR AND RADIATION

Climate Protection Partnership Division

U.S. EPA 6202J
Washington, DC 20460

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

Re: Docket Number M-2010-2152691

Dear Commissioners Gardner & Pizzigrilli:

We appreciate the opportunity to provide comments to this Joint Motion of Training Certifications for Weatherization Installations & Audits. As you may be aware, EPA administers the Home Performance with ENERGY STAR program with over 30 sponsors in 25 states delivering comprehensive energy improvements by highly trained contractors. PA Home Energy (via West Penn Power Sustainability Energy Fund) has been a sponsor of HPwES since 2008 and has received Special Recognition from EPA for its effective delivery of contractor recruitment, training and certification.

When Governor Rendell's signed Act 129 of 2008 into law, large utilities will be required to implement Energy Efficiency and Conservation (EE&C) programs that reduce electric consumption by 1% by May, 2011 and 3% by May, 2013. Furthermore, the Commission has approved a Universal Service Plan that targets Low Income Usage Reduction Programs (LIURP) that addresses gas savings. PA Weatherization Program (WAP) is the administrative body overseeing local agencies who deliver services. With ARRA funding of \$252M for PA's weatherization program, PA WAP is forced to fast track its contractor training infrastructure in order to fully expend funding by March 31, 2012.

With this volume of activity required to expend \$252M in 24 months, the run rate is 1237 jobs a month (at @ \$6500 job average). PA's WAP workforce will be hard pressed to meet this capacity even if new training centers are established. EPA encourages the Commission to accept the training and certification rigors of the PA Home Energy contractor and allow them to participate in meeting the state's weatherization goals. PA Home Energy has been building/certifying contractors for three years and follows the national standards of BPI and RESNET. Furthermore, not only will leveraging this PA Home Energy certified contractors accelerate weatherization activity, but it will also reduce the overall training costs required to build needed workforce.

If PA WAP's develops its own weatherization standards that are not in sync with the national standards of BPI and RESNET, contractor and consumer confusion may compromise statewide adoption. This lack of standard consistency could open the door for PA electric and gas utilities to design their non low-income conservation programs to standards not followed by current PA Home Energy contractors – and the opportunity to meet homeowner/program savings targets may fall well short.

Nationally, HPwES is moving toward higher technician/contractor standards that match those of BPI and RESNET in the delivery of home performance services. Furthermore, with the potential of the new national legislation driving jobs via residential energy efficiency (Home Star), EPA would advise the Public Utility Commission to align its standards to that of BPI and RESNET and allow contractors certified by either BPI or RESNET to participate in state-wide energy efficiency programs.

In conclusion, EPA encourages PA to more fully leverage the existing "shovel ready" resources of the PA Home Energy HPwES program. This alignment should reduce costs, increase program transparency and keep PA in among state energy efficiency leaders.

Sincerely,

A handwritten signature in blue ink, appearing to read "David Lee", written over a circular stamp or seal.

David Lee
ENERGY STAR Residential Branch Manager