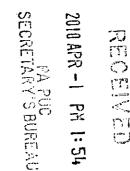


April 1, 2010



James McNulty, Secretary Pennsylvania Public Utility Commission Commonwealth Keystone Building Attn: Secretary's Bureau 2nd Floor, Room-N201 P.O. Box 3265 Harrisburg, PA 17105-3265

Re: Comments on PUC Proposal to Create a Uniform Set of Standards for Weatherization Training – Docket # M-2010-2152691

Dear Secretary McNulty:

The Pennsylvania Department of Environmental Protection ("Department") respectfully submits the following in response to your request for comments by Thursday, April 1, 2010 on:

- Current training required by the electric and gas utility companies of its employees and contractors that conduct weatherization audits,
- Impact on companies' Low Income Usage Reduction Programs ("LIURP"),
- Cost impact of any such change in the training certification on the previously approved Act 129 plans of the electric distribution companies ("EDCs"), and
- Programmatic impact of any such change in the training certification on the previously approved Act 129 plans of the EDCs.

The Department fully supports the Pennsylvania Public Utility Commission's ("Commission's") proposed requirement to establish uniform training standards for all energy efficiency auditors and installers and to make those standards consistent with those developed by the PA Department of Labor and Industry for the Weatherization Assistance Program ("WAP").

The Department recommends adoption of the entire family of Building Performance Institute ("BPI") Standards, Certifications and Accreditation because each integrates with the others through an effective system of quality assurance and quality control. The result is one reliable, high quality system rather than a series of loosely related parts. In the discussion below, "quotes" were taken directly from the BPI certification website (http://www.bpi.org/professionals_designations.aspx) and clearly define the Department's recommendations. These recommendations include adoption of the following certification and accreditation standards:

- The Department endorses the BPI Building Analyst Certification for residential energy auditors to "perform comprehensive, whole-home assessments, identify problems at the root cause and prescribe and prioritize solutions based on building science". This will help to eliminate consumer confusion by providing uniformity in the process and services comprising residential energy audits. Uniformity within this validated approach ensures higher performance of installed measures, improves verification and quality of installations, and encourages a more cohesive approach to achieving greater energy savings.
- The Department also encourages the Commission to support the BPI Envelope Certification for insulation trades to "quantify performance and prescribe improvements to help tighten the building envelope (shell), stop uncontrolled air leakage and optimize comfort, durability and HV/AC performance". This certification provides assurances that homes are properly air-sealed and insulated – the single most critical first step in reducing wasteful and needless energy consumption while maintaining a safe indoor air quality. It will provide homeowners with the best starting point for properly sized and therefore the most efficiently operating HVAC equipment.
- The Department supports the BPI Manufactured Housing Certification for trades working on manufactured housing to "apply house-as-a-system fundamentals to the specific needs particular to the various types of [manufactured] housing technologies" This certification will assist those contractors working in this often overlooked market sector, one with substantial opportunities for achieving overall savings, to properly diagnose and address the broadest possible set of energy efficiency and conservation opportunities.
- The Department supports the BPI Heating Certification for heating system trades-persons to "optimize the performance of heating equipment to help save energy and ensure occupant comfort, health and safety". This focuses on the vital goal of right-sizing heating equipment and that ensures that homeowners will get the most efficient, best performing heating system installation which contributes to lengthen equipment life.
- The Department further encourages Commission endorsement of the BPI Air Conditioning and Heat Pump Certification for A/C and Heat Pump installers to "understand the role of these systems within the whole home and how to diagnose and correct problems properly to achieve peak performance" Similar to the Heating Certification above, this will help homeowners get the most out of every cooling system installation, increase efficiency and help lengthen equipment life.
- The Department also endorses the BPI Multifamily trade Certifications for professionals working on multifamily properties to: "apply building-as-a-system fundamentals to diagnose problems and improve the performance of larger, more complex residential structures" Multifamily trades Certifications will provide the same levels of quality installation, indoor air quality, and performance assurance for families living in multifamily buildings. The construction of these buildings and the presence of multiple dwellings with unique resident behaviors pose a special set of challenges that require a separate set of certified skills in contractors.

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- Finally, the Department supports the BPI Accreditation Standards for companies providing comprehensive weatherization services to: "ensure Quality Assurance (QA) and Quality Control (QC) for all contractors throughout the year by:
 - o Conforming to all BPI Standards, Policies and Procedures
 - Participating in the BPI Quality Assurance Program
 - o Standardizing Data Collection/Reporting Requirements
 - o Maintaining Quality Control Systems
 - o Employing BPI Certified Professionals
 - o Training the Organization's Staff
 - o Maintaining Equipment Properly
 - Educating the Client
 - Resolving Customer Issues
 - o Maintaining Proof of Registration, Licensing, Bonding and Insurance
 - Disclosing Information
 - o Accrediting Each Office Location"

This accreditation will streamline comprehensive service providers' certification and quality control process and provide consumers, EDCs and weatherization agencies with built-in QA/QC and result in long-term cost savings to all parties through centralization of reporting and standardization of requirements.

A common standard for work related to residential efficiency has many benefits as indicated above. Establishing that standard is achievable and is consistent with the policy direction in a number of states. Many states require licensing of residential contractors and have standards for energy efficiency and renovation work in order to assure some level of consumer protection. Currently, while Pennsylvania registers contractors, there are no defined standards for competency in residential energy auditing, audit protocols, installation standards for Energy Conservation Measures ("ECMs"), reporting of ECM efficacy or verification of energy savings. This overall lack of uniformity confuses consumers in search of good results, enhances concerns about credibility and the inability to achieve program goals. Further there is no alignment between the activities of the electric and gas utility companies, the WAP providers, or private service providers. This makes it difficult, if not impossible, to identify and quantify energy- and cost-effectiveness of installed measures.

The Department's support for standardization and, in particular, for the BPI standards is also based on its staff's professional experience and on specific programs that it has created. Relevant staff resumes are attached demonstrating broad, direct experience in drafting of international building codes, membership on the Board of the US Green Building Council,

LEED certification, and EnergyStar program skills. Efficiency programs include the Small Business Efficiency Program under Special Session Act 1 of 2008, the Small Business Advantage program, and residential loan and rebates under the existing KeystoneHelp brand. In particular, the highly successful and nationally recognized Keystone HELP (Home Energy Loan Program) is built around the use of BPI auditing. This program has provided the basis for many other state incentive programs and is the tiered structural model for the proposed federal Home Star legislation. Integral to the success of Keystone HELP is the high level of training and nationally recognized certification standards required of contractors conducting energy audits. Likewise, the proposed federally funded Home Star program will require similarly high standards, certifications and accreditations for participating service providers and auditors. Implementing state-wide high quality, uniform standards for weatherization service providers and auditors will improve the ability of state-, federal- and utility-based energy conservation programs to obtain substantive and verifiable energy and cost savings for the residential sector. As a result, the Department concludes that standardization is a long-overdue step that is necessary to a substantial expansion of the demand for home efficiency services in the state. To this end, the Department recommends that the Commission fully support the BPI certifications listed above as a path to a stronger efficiency market from which consumers can expect to get reliable, high quality services.

In addition to the Keystone HELP program, the Department points to the PA Home Energy program as a demonstration of the value of standardized, quality driven building performance models. This program is built around a BPI training system and is the only currently EPA recognized Home Performance with EnergyStar program in PA. West Penn Power, Met-Ed, PPL and PECO all reference BPI directly in their residential EE&C program plans, while Penelec and Penn Power indirectly reference the BPI standards by inclusion of Keystone HELP in their plans. BPI Certification is required for residential energy service providers in California, Colorado, New York, Texas and many other states. Beyond these examples, a number of other WAP and utility programs which reference BPI. As evidenced by Attachment A, the BPI white paper "*Statistics on Growth of the Credentialing of Home Energy Retrofit Contractors*", there are BPI contractors in 48 states and the District of Columbia. Of those 49, 35 states have either state, utility, NPO (Non-Profit Organization) or WAP programs with BPI requirements. These statistics highlight the robust growth in adoption of BPI standards and indicate the groundswell of activity favoring nationally recognized industry standards.

Establishing a high level of uniform statewide standards of training and competencies for the audit protocols used to identify potential ECMs, for the installation of ECMs and for the reporting of energy savings, will provide multiple benefits to all parties. Benefits will include:

- Reduced cost of training, examinations and quality assurance/quality control (QA/QC) through economies of scale and streamlining of requirements.
- Improved quality of work performed through establishment of uniform protocols.
- Higher levels of energy savings achieved through improved installation and auditing standards.

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- Enhanced customer satisfaction by meeting or exceeding expectations and reducing the number of callbacks for substandard installations.
- Lowered cost of installed measures through standardized procedures and higher levels of QA/QC to ensure optimal energy savings.
- Ability to accurately and consistently predict, measure and verify energy and cost savings.
- Creation of "apples to apples" evaluation metrics and datasets.
- Superior levels of professionalism for auditors and trades-people.
- Increased number of energy efficiency jobs created by ensuring uniform competencies and the ability to cross over between providing public and private sector weatherization services.
- Job creation through increased consumer demand for low-cost, well documented auditing and installation services with a proven track record of energy and cost savings.
- Opening up the residential weatherization marketplace by enabling trades-persons and auditors to perform services across the entire state and having the ability to work in both private and public sector programs.
- Reduced cost for training and certification to trades-persons and auditors by reducing duplicity of training efforts and eliminating requirement to meet multiple or differing requirements.

In addition, the Department strongly recommends that the Commission consider related quality requirements such as the standardization of reporting and the automation of energy consumption data. These will result in a uniform benchmarking and tracking protocol. This will reduce the overall, long-term costs of reporting and verifying energy savings for all energy sources. In addition to simplifying analysis of Act 129 program performance, this will allow customers to track their return on ECM investments and improve their ability to manage energy consumption. Customers will be better able to manage energy consumption long after Act 129 programs have ended.

The Commission should keep in sight similar needs for uniformity, quality assurance and consumer protections for other energy efficiency and conservation programs. These include EDC incentives for ground source heat pumps and solar installations. The DEP recommends that similar installer and system designer certifications, such as NABCEP certification for solar (both PV and thermal) systems and IGSHPA certification for geothermal systems be considered for adoption. Not only will establishing high levels of installer and designer proficiency lead to consistent quality of installed systems, they will allow installers to more easily market their services. Customers will thus have a higher level of trust that they will achieve claimed levels of efficiency and energy savings.

Establishing a uniform set of nationally recognized credentialing criteria for workers employed in residential energy efficiency and conservation services will improve the quality and performance of installed measures, reduce the cost for contractor training, help validate energy savings and thus increase participation and uptake of energy efficiency and conservation programs. Statewide adoption of BPI standards, certification and accreditation will better ensure the success of all Pennsylvania Energy efficiency and Conservation programs, not just those required under Act 129 and will help to promote a more stable business environment for all residential energy service providers. Additional certifications, for solar and ground source heat pump installation, will provide similar benefits in those program areas under the Commission's jurisdiction and in the broader market.

The Department thanks the Commission for the opportunity to comment and looks forward to continuing to work with the Commission and stakeholders to exploit this opportunity to improve the quality of efficiency and conservation programs in Pennsylvania.

Sincerely,

Dan Griffiths Deputy Secretary for Energy and Technology Deployment

Attachment

Copy by electronic mail to: Scott Gebhardt Stephanie M. Wimer David Mick

Attachment A

Department of Environmental Portection

Comments on PUC Proposal to Create a Uniform Set of Standards for Weatherization Training

Docket # M-2010-2152691

April 1, 2010

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Building Performance Institute, Inc. Statistics on Growth of the Credentialing of Home Energy Retrofit Contractors March 23, 2010

Building Performance Institute, Inc. (BPI) is a recognized global leader, supporting the development of a highly professional building performance industry through consensus standards development, individual and organizational credentialing, and a rigorous quality assurance program. BPI offers the following:

- certification of individuals in building energy auditing and analysis, mechanical, envelope and multi-family designations
- accreditation of organizations committed to using a quality management system
- quality assurance to verify conformance and provide feedback
- affiliation of organizations capable of providing localized delivery of BPI services
- open, transparent, consensus developed national technical standards based on sound building science

BPI, in cooperation with the building performance industry stakeholders, are able to establish a professional performance bar at an appropriate level that ensures the consistent delivery of exceptional building performance service to those entrusting the BPI brand.

Headquartered in the Saratoga Technology + Energy Park (STEP) in Malta, New York, with offices in Washington, DC and San Francisco, CA, BPI is now supported by organizations around the globe. BPI originated in 1993 by a group of building tradesman, product manufacturers, and a number of public program professionals. Their vision was to create a resource for independent, third-party verification of worker skills in the weatherization industry and building trades. In 1996, the first certifications were issued for weatherization auditors and installation personnel. Since that time, BPI has expanded its capabilities to serve not only the weatherization industry, but also the growing building performance contracting industry from both a residential and multifamily buildings perspective.

The BPI Certification designations that are trade related (i.e., Mechanical and Envelope series) are not intended to take the place of any available trade industry certifications that are typically focused on service and installation knowledge and skills. BPI Certifications are focused on a candidate proving their ability to evaluate and to optimize the performance of improvements in installation and in the operation and service of building systems. BPI Certifications also ensure that the candidate understands the interaction of specific building systems with other building systems so that it does not create conditions that are harmful to life, limb or property.

Each certification designation offered by BPI is developed through an open, transparent, credible, defensible process to ensure that the knowledge, skills and competencies, essential for earning the credential, are properly evaluated through a series of written and field exams.

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BPI develops and maintains a series of voluntary performance based installation and application standards, guidelines, methods for testing, and other pertinent requirements for home and building retrofits intended for use in residential construction and other applications with the users' end needs in mind.

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.

The National Technology Transfer and Advancement Act (NTTAA) follows the basic tenets of OMB Circular A-119 to use standards developed by voluntary consensus standards bodies, as well as encouraging federal agencies in their deliberations. BPI programs and standards activities have enjoyed extensive cooperation with and participation by numerous federal and state agencies. These standards are pointed to by both DOE and EPA in their program activities and BPI's national expansion was funded through a grant provided by DOE, EPA and HUD. DOE holds one of five positions on BPI's Standards Management Board, while EPA currently is sponsoring a Home Performance with ENERGY STAR (HPWES) pilot in northern Virginia that requires the contractors to become accredited by BPI and follow the BPI Standards in their home energy retrofit work. Other state and utility programs (Energy Trust of Oregon, Austin Energy, NYSERDA, and NJ Bureau of Public Utilities) use BPI Standards and credentialing as the basis of their programs. The NYSERDA HPWES program, for example, requires contractors to follow BPI Standards in their work. To date over 35,000 "whole house" energy retrofit projects have been completed in the state by contractors accredited by BPI.

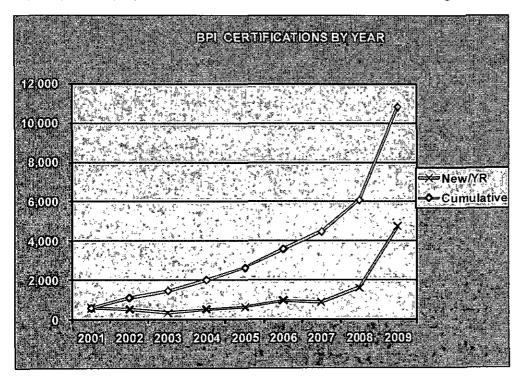
BPI also maintains a series of personnel certifications based on these standards. In the single family realm of the HOME STAR legislation, BPI maintains certifications in the areas of Building Analyst, Shell/Envelope, Heating, and Air Conditioning/Heat Pump. These certifications are based on 100 question timed and secured written tests as well as a two-hour field test with diagnostic equipment administered by a field examiner approved by BPI. BPI certifications must be renewed every three years. If the renewing candidate has 30 CEUs, then only a repeat of the field test is administered. Renewing candidates with less than 30 but greater than 10 CEUs need only re-take the 50 question specialty exam for their specialty along with the field test. Others must take both full tests. BPI is currently in the process of applying to ANSI for an accreditation for its personnel certifications under ANSI/IEC/ISO 17024.

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.

BPICER	TIFICAT	IONS BY YEAR
Year	New	Cumulative in Market
2001	594	594
2002.7	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	

The chart below tracks BPI certification growth by year. It clearly shows that BPI has the capacity to ramp up to meet increased demand for its credentialing services.



The following chart provides the number of active BPI certifications by state along with a listing of sponsoring state or utility programs.

State / T	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	
lilinois	118	Tri-county Labor-Management Council
Indiana	363	Indiana Community Action Agency
lowa	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 following chart provides a listing of training organizations by location who have affiliated with BPI and deliver training that aligns with BPI standards.

Affiliate Name	State
Alaska Craftsman Home Program, Inc.	AK ·
Alaska Housing Finance Corporation	AK
University of Alaska Southeast	AK
Wisdom & Associates Inc.	AK
American Infrared Consultants	AZ
Arizona Power Save, L.C.	AZ
Building Performance & Weatherization Training Center	AZ
Foundation for Senior Living (or FSL)	AZ
Power Tools, LLC	AZ
CACTUS-Community Alliance for Career Training & Utility Solutions	CA
California Building Performance Contractors Assn.	CA
ConSol	CA
'Energy Conservation Institute	CA
Greener Dawn, Inc.	CA
OurEvolution Engineering, Inc.	СА
Richard Heath & Associates, Inc.	CA
Colorado Mountain College	CO
EnergyLogic, Inc.	CO
ICAST	СО
Invisible Energy	со
Lightly Treading, Inc.	CO
Institute of Environmental Management and Technology, Inc.	СТ
Zerodraft of CT - Waterford	СТ
Building Science Tech	DC
Taurus Renovation Consultants, Inc.	DC
Delaware Technical & Community College	DE
Institute of Envelope Science - McNeal and White	FL.
GreenChoice Consulting-Howard Katzman	GA
Southface Energy Institute	GA
Carpenters Training Center	IL
Green Dream Group, LLC	IL I
Illinois Central College	IL
Insight Property Services, Inc.	IL
Midwest Home Performance, Inc.	IL.
Priority Energy, LLC	IL
Thermal Imaging Services, Inc.	IL
Utilivate Technologies, LLC	IL
Indiana Community Action Association (INCAA)	IN
Sherlock Homes Inspection Service Inc.	IN
Energy & Environmental Training Center of KC Inc.	KS
Kansas Building Science Institute (KBSI)	KS
Neosho County Community College	KS
Conservation Services Group - MA	MA
Green Stamp (Moldtec Corp. dba Green Stamp)	MA
Greener Resources	MA
North Shore Community College	MA
BGE Home Products & Services Inc.	MD
Home Energy Team Institute	MD
Maryland Energy Conservation, Inc.	MD
SENTECH, Inc.	MD

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Maine Energy Marketers Association	ME
	MI
American Medical Careers, Inc.	
Building Science Academy, LLC Northwestern Michigan College	MI MI
Fond du Lac Tribal and Community College	
	MN
Accurate Rater Network by Hathmore Technologies, LLC	<u>MO</u>
Central Ozarks Private Industry Council	<u>MO</u>
Columbia Water & Light	<u>M0</u>
Cornerstone Energy Solutions, LLCMO	NO
Linn State Technical College	MO
Manufacturing Training Alliance	MO
Metropolitan Energy Center	MO
Missouri Botanical Garden's EarthWays Center	MO
St. Louis Community College-Center for Sustainability	MO
Saturn Resource Management Inc.	MT
Apple Blossom Insulators Inc.	NC
BTK Building Inspections & Analysis LLC	NC
Building Performance Engineering	NC
Carolinas Energy Associates, LLC	NC
EverBlue Energy Inc.	NC
Home Energy Partners, Inc.	NC
Energy Audits Unlimited, LLC	NH
GDS Associates, Inc.	NH
Keene State College Division of Continuing Education	NH
Lakes Region Community College	NH
Manchester Community College	NH
Atlantic County Institute of Technology	NJ
Conservation Services Group - NJ	NJ
EAM Associates	NJ
Employment & Training Institute, Inc. (ETI)	U.
Isles, Inc.	U
Kipcon, Inc.	N)
PROCEED Inc.	NJ
Santa Fe Community College	NM
Energy Conservation Group, LLC	NV
Association for Energy Affordability (AEA)	NY
BP Consulting	NY
BPTC, LLC	NY
Broome County Community College	NY
Building Performance Institute, Inc.	NY
Center for Sustainable Energy at Bronx Community C	NY
Clean Edison, LLC	NY
Conservation Services Group - Albany	NY
Conservation Services Group - Long Island	. NY
Energy Efficiency Training Center	NY
Erie Community College, Workforce Development	NY
Fulton-Montgomery Community College	NY NY
Green Jobs Training Center, Inc.	NY
Hudson Valley Community College	NY
New York State Weatherization Directors' Assoc.	NY
	NY

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Adona Energy and Environmental Consulting	
Adena Energy and Environmental Consulting Cincinnati State Technical & Community College	ОН
Corporation for Appalachian Development (COAD)	OH
Conservation Services Group - OR	OR OR
Efficiency Services Group	OR
ENERGY CONSERVATION TRAINING CO. (ECTC)	OR
ACTION-Housing, Inc.	PA
CMC Energy Services, Inc.	PA
Energy & Environmental Solutions, Inc.	
Energy Coordinating Agency	PA
PA Home Energy Consultants, LTD	PA
Pure Energy	
Therma-View Infrared & Energy Consultants	PA
UGI HVAC Enterprises, Inc.	PA
Weatherization Training Center at Pennsylvania Col	PA
Community College of Rhode Island	RI
Coastal Training Consultants	SC
.Facility Strategies Group, LLC	SC
Home Energy Group, LLC	SC
South Carolina Technical College System	SC
Conservation Services Group Tennessee	TN
Labfour Career Training Institute	
Pellissippi State Technical Community College	TN
1 Tandem Enterprises	ТХ
101 Green Building Science	TX
Apple Energy Group	ТХ
Atlas Efficiency Solutions, LLC	ТХ
Austin Community College	ТХ
Building Performance & Comfort, Inc.	TX
Champions School of Real Estate	ТХ
CLEAResult Consulting, Inc.	ТХ
Green Energy Audit Certification	TX
Halcyon Environmental LLC	TX
ICF International-Houston, TX	TX
Astracor, Inc.	VA
Community Housing Partners	VA ·
ICF International-Fairfax, VA	VA
SENCON	VA
Virginia Home Performance, LLC	VA
Virginia Homer enormance, de	VT
Building Performance Center	WA
Comfort Institute, Inc.	WA
Environmental Outreach and Stewardship Alliance (EOS)	WA
South Seattle Community College	WA
American Home Inspectors Training Institute	
	WI
Wisconsin Energy Conservation Corporation	WY
Wyoming Energy Council, Inc.	44.1

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