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October 19, 2016

Sherri Jones
New Jersey Board of Public Utilities
44 South Clinton Avenue
Trenton New Jersey 08625

Via Email: publiccomments@njcleanenergy.com

Re: Proposed Changes to the NJCEP Contractor Remediation Procedures

Dear Ms. Jones,

The following comments are respectfully submitted by MaGrann Associates, a for-profit energy engineering and consulting small-business firm established in 1982 and based in Mt. Laurel, New Jersey. Throughout the life of New Jersey's Clean Energy Program, and the predecessor programs operated by New Jersey's electric and gas utilities, MaGrann Associates has provided energy rating, engineering design, verification, certification, training and program implementation services for New Jersey's builders, developers, contractors, design professionals, utility companies, building owners and managers. To date, MaGrann Associates has supported energy efficiency improvements in more than 100,000 homes and businesses. These comments are submitted from the perspective of our role as an energy rating company supporting builders and developers participating under the Residential New Construction program.

1. The document should include a definition of applicable "standards" as referenced in the table. Some NJCEP programs, such as Residential New Construction, require contractors (Home Energy Raters) to comply with specific national standards for competency, quality, conduct and technical procedures. The definition should make it clear that disciplinary procedures will be applicable to failures to comply with the standards referenced by the NJCEP programs.
2. "Established guidelines and procedures" should be those guidelines and procedures that are written and published or otherwise made available to all contractor/rater participants.



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3. The document could make it clearer that any level of action may be applied directly based on the severity of the infraction, without first having to pass through each lower action level.
4. The document should identify how and at what point in the process or level of action the contractor's customers and public will be made aware of the status of the contractor, especially when debarment is invoked.

Thank you for your consideration and this opportunity to provide stakeholder input. I would be happy to provide any additional information or clarification that would be helpful in evaluation of these comments.

Sincerely,



Ben Adams
Vice President, Program Development