

January 21, 2019

Jamie Hulan  
Director  
Equipment Division  
Natural Resources Canada

**Re: Comments on Regulations Amending the Energy Efficiency Regulations 2016, from  
December 8 - 2018**

Dear Mr. Hulan,

Efficiency Canada is the national voice for an energy efficient economy, advocating to make our country a global leader in energy efficiency. We convene people from across Canada's economy to work together to advance policies required to take full advantage of energy efficiency. And we communicate the best research out there to build a more productive economy, sustainable environment, and socially just Canada.

The Atmospheric Fund (TAF) is a public agency established in 1991 by the City of Toronto and endowed by the City and the Province of Ontario. TAF works closely with stakeholders across the Greater Toronto and Hamilton Area (GTHA) to test and advance innovative programs to reduce greenhouse gas (GHG) emissions and air pollution. However, the views expressed in this submission do not necessarily represent those of the City of Toronto, the Province of Ontario or other GTHA stakeholders.

We hereby would like to thank Natural Resources Canada for the opportunity to provide input on the proposed amendments to update the *Energy Efficiency Regulations*.

**General Comments**

Efficiency Canada and the Atmospheric Fund commend the Government of Canada's (the "Government") renewed efforts to improve and expand the minimum energy performance standards (MEPs), testing standards, and reporting requirements to improve the energy



efficiency of nine residential and commercial product categories, two of which are not currently regulated federally (clean water pumps and miscellaneous refrigeration products). Along with the previous Amendments, we understand that this initiative reduces regulatory differences while supporting cross-border trade and investment, and, ultimately, reduces costs for citizens, business and economies. In a broader context, these energy efficiency standards are fundamental to meeting the objectives established in the Pan-Canadian Framework on Clean Growth and Climate Change.

***Minimum energy performance standards are one of the most cost-effective tools the Government can use to support significant GHG emissions reductions.*** It is estimated that the Amendment 16 would result in an annual reduction of 0.33 megatonnes of GHG emissions by 2030, contributing to Canada's goal to reduce GHG emissions by at least 30% below 2005 levels by 2030. The quantified benefits from energy and GHG savings are estimated to be three times as large as the technology and administrative costs, producing a total net benefit estimate of \$818 million by 2030.<sup>1</sup>

***Consumers save money by purchasing higher efficiency product models that have lower costs over their lifetime.*** With lower energy bills, consumers are able to invest the capital saved in different areas of the economy. The result is an increased demand for local goods and services, boosting economic output and jobs.<sup>2</sup>

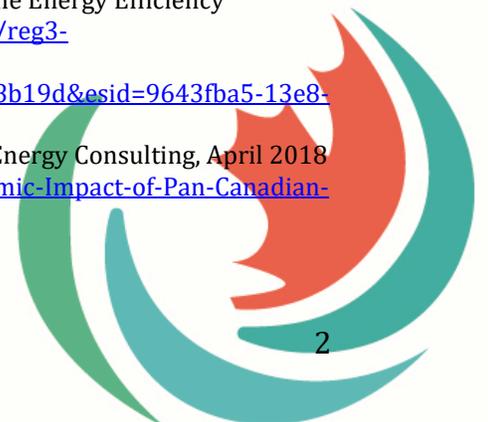
For businesses, ***regulated equipment saves money that can lead to increased productivity and competitiveness.*** Energy savings from lower energy bills and avoided maintenance and operation costs offers an opportunity to make capital and human resource investments, increasing productivity.<sup>3</sup>

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<sup>1</sup> Canada Gazette, Part I, Volume 152, Number 49: Regulations Amending the Energy Efficiency Regulations, 2016 [http://gazette.gc.ca/rp-pr/p1/2018/2018-12-08/html/reg3-eng.html?\\_cldee=YnB1cmNlbGxAdGFmLmNh&recipientid=contact-2773c7d20329e71180fe5065f38b2271-623efb84ad914795ba09a9fe9878b19d&esid=9643fba5-13e8-e811-813e-5065f38a5a41](http://gazette.gc.ca/rp-pr/p1/2018/2018-12-08/html/reg3-eng.html?_cldee=YnB1cmNlbGxAdGFmLmNh&recipientid=contact-2773c7d20329e71180fe5065f38b2271-623efb84ad914795ba09a9fe9878b19d&esid=9643fba5-13e8-e811-813e-5065f38a5a41)

<sup>2</sup> The Economic Impact of Improved Energy Efficiency in Canada, Dunsky Energy Consulting, April 2018 <https://www.energycanada.org/wp-content/uploads/2018/04/Economic-Impact-of-Pan-Canadian-Framework-Energy-Efficiency.pdf>

<sup>3</sup> Ibid



***Energy efficiency improvements also provide non-energy benefits*** such as improved home comfort, indoor air quality, and reduced noise from higher performance products.<sup>4</sup> Macroeconomic job growth is also a key benefit outlined in an Efficiency Canada report demonstrating that implementing energy efficiency measures would lead to 118,000 annual jobs, on average, between now and 2030.<sup>5</sup>

For the reasons above, we urge the Government to move forward with the proposed standards.

Sincerely yours,



Corey Diamond,  
Executive Director  
Efficiency Canada



Cassia Moraes Correa,  
Policy Analyst  
Efficiency Canada



Bryan Purcell  
Director of Policy & Programs  
The Atmospheric Fund

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<sup>4</sup> Canada Gazette, Part I, Volume 152, Number 49: Regulations Amending the Energy Efficiency Regulations, 2016 [http://gazette.gc.ca/rp-pr/p1/2018/2018-12-08/html/reg3-eng.html?\\_cldee=YnB1cmNlbGxAdGFmLmNh&recipientid=contact-2773c7d20329e71180fe5065f38b2271-623efb84ad914795ba09a9fe9878b19d&esid=9643fba5-13e8-e811-813e-5065f38a5a41](http://gazette.gc.ca/rp-pr/p1/2018/2018-12-08/html/reg3-eng.html?_cldee=YnB1cmNlbGxAdGFmLmNh&recipientid=contact-2773c7d20329e71180fe5065f38b2271-623efb84ad914795ba09a9fe9878b19d&esid=9643fba5-13e8-e811-813e-5065f38a5a41)

<sup>5</sup> The Economic Impact of Improved Energy Efficiency in Canada, Dunsky Energy Consulting, April 2018 <https://www.energycanada.org/wp-content/uploads/2018/04/Economic-Impact-of-Pan-Canadian-Framework-Energy-Efficiency.pdf>