

December 29, 2018

Jamie Hulan
Director
Equipment Division
Office of Energy Efficiency
Department of Natural Resources
930 Carling Avenue
1st Floor, Room 136-C
Ottawa, Ontario K1A 0Y3

Re: Comments on Energy Efficient Heating and Ventilation Products from *Canada Gazette*, Part I, Published October 20, 2018

Dear Mr. Hulan,

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.

Efficiency Canada advocates to make sure our country is 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 better life for Canadians.

TAF and Efficiency Canada 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

We commend the Government of Canada's (the "Government") renewed efforts to improve and expand the minimum energy performance standards (MEPS) for ventilation and heating product categories. Space and water heating represent a significant portion of Canada's GHG emissions, at 12%

in 2014.¹ TAF commented on the preliminary proposal on energy efficiency requirements for gas and oil-fired commercial boilers (see Appendix); we reiterate the need for the Government to act swiftly to implement the proposed efficiency standards to support Canada's 2030 GHG emissions reduction target and the transition towards a low-carbon economy. These energy efficiency standards are a key tool that the Government can use to meet the objectives established in the Pan Canadian Framework for the heating and cooling of buildings.

Modernizing MEPs for heating and ventilation products will encourage innovation aimed at improving energy efficiency, paving the way for the adoption of a net-zero energy ready model building code by 2030.² These amendments represent a core element of the Government's national plan to reduce emissions from the building sector, providing a regulatory approach to encourage a market for high-efficiency products and ultimately reducing energy consumption. ***Improved energy efficiency is expected to support Canada's sustainable economic growth, including job growth and increased competitiveness***. This growth will be further supported by the alignment of federal and provincial energy efficiency standards, while also maintaining consistency with US federal regulations in some areas.

Minimum energy performance standards are one of the most cost-effective tools the Government can use to support significant GHG emissions reductions. Over the long-term, the total benefits of Amendment 15 are expected to exceed the total costs by more \$1.8 billion dollars. Canadian households and business will benefit from \$215 million in average annual energy cost savings, while reducing carbon emissions by a cumulative total of over 5 megatonnes by 2030.³ Energy savings experienced by households and businesses will be recycled into other sectors of the economy, stimulating job growth and enhancing productivity.

We appreciate the Government's renewed commitment to moving forward with energy performance standards, and we urge the Government to move forward with the proposed standards.

Sincerely yours,

Bryan Purcell
Director of Policy & Programs
The Atmospheric Fund

Brendan Haley
Policy Director
Efficiency Canada

¹ <https://www.canada.ca/en/services/environment/weather/climatechange/pan-canadian-framework/complementary-actions-reduce-emissions.html>

² <https://www.canada.ca/en/services/environment/weather/climatechange/pan-canadian-framework/complementary-actions-reduce-emissions.html>

³ http://www.gazette.gc.ca/rp-pr/p1/2018/2018-10-20/html/reg3-eng.html?_cldee=YnB1cmNlbGxAdGFmLmNh&recipientid=contact-2773c7d20329e71180fe5065f38b2271-ce5939b7e4434d2981ae8d0924994621&esid=9afeadc0-ced2-e811-813e-c4346bdc3131