

January 17, 2020

Mr. Andrew Howse,
Ministry of Energy, Northern Development and
Mines, Conservation and Renewable Energy Division
77 Grenville St., 5th Floor
Toronto, ON
M7A 2C1
Canada

Dear Mr Howse,

**RE: Ontario Regulation 509/18, Energy Efficiency – Appliances and Products
Environmental Registry Amendment 25 Posting, Draft Technical Sheet (Gas-Fired Commercial
Boilers)**

On behalf of BOMA Toronto I would like to thank you for the opportunity to submit our feedback to the proposal to amend Ontario's Energy and Water Efficiency Regulation (O. Reg. 509/18 under the Electricity Act, 1998), specifically related to efficiency requirements for HVAC equipment in the commercial and residential sectors.

The Building Owners and Managers Association is an International organization of 18,000 commercial real estate professionals. It is recognized as the leading industry voice for property owners and managers in North America. Building Owners and Managers Association of Greater Toronto Area (BOMA Toronto) is a not-for-profit industry association established in 1917. Our membership represent over 80% of leading building owners, property and facility managers, developers, corporate facility managers, leasing professionals, and industry suppliers in the GTA and beyond. Our sister chapter, BOMA Ottawa, services the 613 region. Our broader mandate is to develop, promote and advance building management best practices through proactive advocacy, exceptional education and the creation of valuable networking opportunities. Sustainability and climate change are a high priority for our members, with many having public GHG emissions reduction targets, and natural gas consumption typically represents the majority of a commercial property's carbon footprint.

We became aware of this proposed amendment at the 11th hour, and our understanding is that a key outcome will be that high-efficiency condensing boilers will be the only boilers available starting in 2025. We believe this proposal is well-intended, and we appreciate that the outcome in many buildings will be aligned with those of our members' in terms of energy conservation and reduced carbon footprint.

However, we have concerns about its broad application to ALL commercial properties, both in terms of cost-benefit of this proposal and its practicality of implementation. Savings in buildings designed for high-temperature hot water supply water may be marginal compared to a standard efficiency replacement. A high-efficiency condensing boiler retrofit will typically require stainless steel venting which will add material cost. And if an existing boiler fails on a design (very cold) day, many buildings will lack the necessary redundancy to be able to maintain occupant comfort for weeks or months during the retrofit period. The similar arguments could be extended to other equipment referenced under amendment 15 (heat pumps, chillers, etc.)

Recommendation 1: Considering the lack of awareness and deficiency of information related to all the issues surrounding this proposed amendment, we strongly urge the government that this proposal be put on hold to allow for transparent and thorough review of costs, benefits, and impact on large commercial properties.

Recommendation 2: Transparency and adequate stakeholder engagement and consultations are critical to successful implementation of this regulation. As such, we recommend that more industry consultations be conducted before adopting measures of this magnitude.

BOMA is very committed advancing better building performance and sustainability in the Commercial Real Estate (CRE) industry. We have a great track record of working collaboratively with various Ontario Ministries and governmental agencies to address and resolve issues impacting the CRE industry and help implement policies. We would be pleased to meet with you to discuss this further. Please contact me with any questions.

Yours truly,
Bala Gnanam
VP – Energy, Environment & Advocacy

Email copy to:

Hon. Prabmeet Singh Sarkaria, Associate Minister of Small Business and Red Tape Reduction
Susan Allen, President & CEO, BOMA Toronto
Dean Karakasis, Executive Director, BOMA Ottawa
Benjamin Shinewald, President & CEO, BOMA Canada
Terry Flynn, GM, BentallGreenOak; Chair - BOMA Toronto Energy Committee