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Submitted online via Ontario's Regulatory Registry

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

**RE: ERO 019-0924 - Proposal to amend energy performance standards
Comments from the City of Toronto**

Thank you for the opportunity to submit comments on the above referenced proposed amendment aimed at increasing minimum energy performance standards.

Toronto's long and robust history of environmental and health protection has made it a leading example of sustainability amongst municipalities. Toronto City Council has enacted many long-term strategies and plans that work together to achieve its vision of a clean, green, and sustainable city. In October 2019, Toronto City Council voted unanimously to declare a climate emergency and to accelerate efforts to mitigate and adapt to climate change including the target to reach net-zero emissions by 2050, or sooner.

Toronto supports the harmonization of Ontario standards with the federal NRCan standards as this leads to more clarity in the market and an increase in equipment efficiency requirements. Additionally, Toronto supports NRCan's use of a social cost of carbon value in the cost-benefit analysis during the evaluation of the performance standards. It is important to continue to apply this climate lens to all evaluations federally, provincially, and municipally.

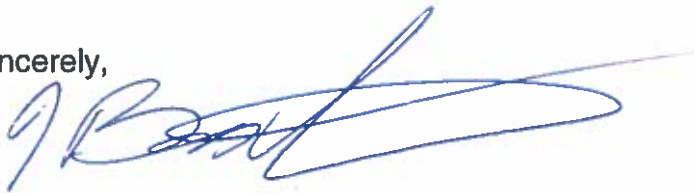
However, Toronto believes there is room for additional improvement. Achieving the necessary greenhouse gas emission reduction targets and adapting to climate change will require transformational changes in how we live, work, commute, and build. This will require a coordinated effort by all levels of government, industry, businesses, and residents alike. It is important that we recognize the level of ambition needed when making all decisions, ensuring that equipment and fuels installed now will not continue to contribute to climate change in the future.

Based on our review of the proposed amendments, we recommend the following items be considered:

- The efficiency standard needs to be set even higher than the harmonized standard in order to reach Federal climate change targets. The standard needs to require minimum equipment efficiencies greater than 100%, necessitating a shift in the technologies that are installed. Toronto is supportive of further accelerating increased efficiency requirements along with accelerated implementation schedules to ensure greenhouse gas emissions are minimized.
- Conservation is an important first step toward achieving our greenhouse gas emission reduction targets, however we will never meet these targets without a more fundamental shift – a transition to low-carbon fuels. The next generation of standards needs to ensure that equipment is transitioned away from carbon based fuels to low-carbon options that align with our emission reduction goals. This shift in standards needs to happen immediately.
- Standards should focus on reducing greenhouse gas emissions by requiring low-carbon fueled appliances and equipment. Carbon lock-in will be caused by continued installation of natural gas equipment with effective lifetimes beyond the net-zero carbon emissions horizon. Furthermore, as the federal price on carbon rolls out, the installation of new carbon intensive appliances will create an energy price burden for residents. Standards should focus on requiring low-carbon fueled appliances that will reduce emissions and save energy costs.
- Similarly, residential window performance requirements must be further increased and phased-in using accelerated timelines in order to ensure building envelopes can perform to the high levels needed to meet building net-zero emission standards and meet our greenhouse gas emission reduction targets.

Should you have any questions or comments about this submission, please contact Devon Stopps, Senior Engineer, Environment and Energy Division, at Devon.Stopps@toronto.ca.

Sincerely,



Jim Baxter, P. Eng., MBA
Director, Environment & Energy Division