

January 17, 2020

Andrew Howse
Senior Advisor, Energy Efficiency Standards Unit
Conservation and Renewable Energy Division
Ministry of Energy, Northern Development and Mines
andrew.howse@ontario.ca

Re: ERO 019-0924, Proposal to amend energy performance standards

Dear Mr. Howse,

The Federation of Rental-housing Providers of Ontario (FRPO) has been the leading voice of the province's rental housing industry for over 30 years. We are the largest association in Ontario representing those who own, manage, build and finance, as well as those who service and supply residential rental units. We represent more than 2,200 members who own or manage over 350,000 units across the province.

I am writing to you to provide comments as they relate to Ontario Regulation 509/18, Energy Efficiency – Appliances and Products Environmental Registry Amendment 25 Posting, and the update that Enbridge provided to us on the intent by the Province to align with the recently updated federal equipment efficiency regulations addressed by SOR/2019-164 – Amendment 15 regarding minimum performance regulations for retrofit Commercial hot water boilers. We share Enbridge's concerns around a blanket adoption of this federal regulation, specifically as it relates to the potential undue financial burden this could place on our members and tenants.

We agree with Enbridge's recommendation that further efforts be undertaken by the Province to better understand the cost implications of enforcing this regulation to Ontario Building Owners, as while this was considered at a federal level, it will have a more significant impact in Ontario, than anywhere else in Canada.

With considerable rental stock built between 1960 and 1980, we support increasing the energy efficiency of rental operations in the most practical way possible. We appreciate the desire of the government to take a simpler, more streamlined approach by aligning with federally adopted regulations.

In this case, there was not a comprehensive understanding of the cost-benefit analysis presented by NRCAN, to ensure that this will not create an additional cost to be borne

by building owners, managers and occupants—while not providing a material increase in energy efficiency. Buildings that have not been constructed or designed for compatibility with this new technology will result in significant expense that does not achieve the intended efficiency. Furthermore, provincial alignment with federal regulation in this way could also trigger above guideline increase applications at the Landlord and Tenant Board, potentially in the thousands.

Sincerely,



Tony Irwin
President & CEO

CC: Alex Beduz
Chief of Staff, Minister's Office
Ministry of Municipal Affairs and Housing
alex.beduz@ontario.ca

