



Saturday, August 22, 2020

Melanie Torrie
Ministry of Energy, Northern Development and Mines,
Conservation and Renewable Energy Division
77 Grenville St.
5th Floor
Toronto, ON
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Canada

Dear Ms. Torrie

**RE: 2021-2024 Conservation and Demand Management Framework -
Comments**

The previous Conservation Demand Management (CDM) Framework has provided significant support towards the shared effort across Ontario to use energy more efficiently and reduce carbon emissions. The Corporation of the City of Guelph as well as industrial, commercial, institutional and residential community members within the city have subscribed to the programs under the CDM framework and recognize the essential role the programs have played in implementing these projects and initiatives. As such, the City of Guelph is excited to see the continued commitment to the framework and would like to provide comments on this proposal.

- Consistency and growth of the framework is important. There has been a significant effort and learning by all stakeholders to learn, adopt and implement existing CDM programs. It would be detrimental to get rid of the old framework and programs. Rather, leverage and build-on the successful elements in an effort to enhance the framework.
- Previous programs such as the High Performance New Construction program built-awareness and incentivized energy efficiency for new construction initiatives. Over time, these programs were cancelled. There is need for incentives for new construction and development projects to design and build in an energy efficient manner. Energy efficiency retrofits are much more costly and complex to complete.
- There is a gap between development and ownership. Programs need to be put in place to ensure that life cycle costing and energy conservation are considered throughout the development stage and through to the building owners and operators.
- Retrofit programs are still needed to move old stock facilities and equipment to be energy efficient

- The previous CDM program had tackled some of the lower hanging fruit energy savings measures.
- The Embedded Energy Manager Program has been an effective means to provide energy focused resources to organizations. By having in-house resources with the focus on energy conservation and demand management, the broader organizational culture can adopt energy conservation throughout all of its service areas.
- Incentives for training (such as certified energy manager (CEM), certified measurement and verification professional (CMVP), etc.) have been effective at keeping energy management sector up-to-date and knowledgeable
- As we are looking to combat climate change with lowering greenhouse gas levels, incentives should look to include energy efficient fuel switching to lower emissions energy sources (for example heat pumps). Careful consideration is needed for this as we must continue to maintain the reliability of the electrical grid and understand that poor energy efficient fuel switching (for example baseboard electrical heat) would increase electric demand and adversely affect the grid.
- Incentivizing electric vehicle charging infrastructure is another example of energy efficient fuel switching and an effective means to reduce carbon emissions.
- ISO50001 is an effective and internationally recognized energy management system that gets at the root of organizational culture and sustainable energy management. The City is looking to strictly comply with the ISO standard. Support for awareness building, training and implementation would further strengthen energy conservation throughout the province.

The City of Guelph looks forward to the 2021-2024 Conservation and Demand Management Framework as it directly aligns with the City's Corporate 100% Renewable Energy and Community Net Zero Carbon Targets.

Sincerely,

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