

December 18. 2023

Minister Jonathan Wilkinson Natural Resources Canada (NRCan) jonathan.wilkinson@parl.gc.ca

CC: Yasime Atassi yasmine.atassi@nrcan-rncan.gc.ca

> Jean-Clement Chenier jean-clement.chenier@nrcan-rncan.gc.ca

Dear Minister Wilkinson,

RE: Canada Greener Homes Grant Closing

I am writing to you on behalf of the Canadian Association of Consulting Energy Advisors (CACEA) and the Energy Advisor (EA) profession at large requesting that you reconsider your decision to close the Canada Greener Homes Grant (CGHG) as of March 31, 2024 and to also consider the future contributions of EAs.

The CGHG has greatly encouraged homeowners to focus on improving the energy efficiency of their homes. Based on the overwhelming response to the Grant, there is clearly a strong interest by Canadians to improve their homes' efficiency and reduce green house gas (GHG) emissions. It is a significant step forward in our combined efforts to improve the performance of the country's 14+/million existing homes - while contributing to more healthy, safer, comfortable, and resilient buildings.

The program has also highlighted the importance of engaging with an EA and started conversations about how this profession can provide important value and support to homeowners. There is more work that can be done to reinforce this message, but this has been a great step forward.

NRCan's investment of several millions of dollars has also contributed to a robust and viable profession - with approximately 1,000 EAs entering the marketplace since the start of the CGHG. (Based on NRCan's monthly reports to industry). The Grant has also highlighted the value and importance of the EnerGuide label – both as mechanism for impartial, third-party program verification, as well as a recognized and credible energy rating system. In short, the CGHG has been a positive initiative for homeowners, EAs, and the industry at large.

Unfortunately with the proposed wind down of the Grant, the negative impact on the progress that has made to date will be significant. It is imperative that we continue the momentum of homeowner retrofits if we are going to come anywhere close to achieving Canada's green house gas (GHG) emission targets. Unfortunately, retrofits are costly and combined with current economic pressures due to rising costs and interest rates, the lack of incentive will cause a sizable decline in these critical home retrofits.

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Further, As a result the EA sector will be notably impacted. The decrease in demand means there will be less work for EAs. Jobs will be lost; many will leave the sector never to return; and there will be a notable reduction in the number of practicing EAs – impacting both the existing and new construction sectors. There will also be a similar fallout in the larger retrofit marketplace including manufacturers, contractors, installers, and the like. Much of the important gains made to support the home retrofit industry will be lost, and should a similar program return in the future this will need to be built up again. We have seen exactly this happen with previous grant programs.

EAs play a central role in helping Canada achieve its climate goals. In addition to contributing to incentive programs such as the CGHG, experienced EAs can provide additional support to homeowners, contractor, builders and other Part 9 building stakeholders to explore pathways to reduce their carbon footprint and have higher performing, more resilient homes. In addition, EAs serve a vital role in building code compliance as well as supporting the Prime Minister's mandate for mandatory home labelling.

To accomplish our shared objectives, we must find ways to encourage EAs to remain in the sector. In the short term, this ideally means the continuation of the CGHG. In doing this, you will also provide industry with the time needed to provide the necessary upskilling and training to prepare for additional services that EAs might provide – filling current industry gaps and providing additional valued services to Canadians.

CACEA is currently exploring training opportunities that include:

- o a credential where EAs can assist with heat pump sizing
- o energy coaching/concierge skills
- o air tightness verifiers supporting the 9.36 tiered National Building Code
- new construction audit and 9.36 tiered code compliance training
- advanced building science micro credentials that address electrification and peak load management, HVAC equipment and deep energy retrofits.

It is a worthwhile investment to continue the important focus on the need for impactful retrofits, contributing to a sustainable profession and supporting Canada's climate action plan.

We anticipate that the Government is considering additional programs that will be designed to support its *Green Building Strategy* and to follow the CGHG. Again, we strongly recommend that the Government continued to find ways to financially support programs that promote energy efficiency strategies – more is needed now and in the future, along with the continued engagement of EAs.



However, we request that the Government consider the associated administrative burdens of a new program on the industry, and not only homeowners. It is also imperative that industry receives sufficient time to become familiar with the program: to understand the details and nuances; test the procedures; and develop internal workflows. We cannot have a similar program launch that we experienced with the CGHG – a calamitous experience for the EA sector, suppliers, contractors, and homeowners.

Finally, when putting together future programs, we strongly encourage Government to consider the broad diversity of the needs of Canadians who are located in different climate zones and energy markets, and take a more flexible, professionally led approach. Upgrades must be regionalized and support the "house-as-system" concept that encompasses a balanced approach to carbon emissions and energy savings which is missing in the current CGHG program design.

As we see today, and in the past, incentive programs by design are short-lived, restrictive and unreliable. We encourage the Government to leverage initiatives and strategies where registered EAs – particularly those who are CACEA member (see our <u>directory</u>) can be recognized as professionals with expertise that go beyond servicing and verifying incentive programs. Finding ways to continue to leverage the expertise of an experienced EA is a prudent investment by all levels of government, homeowners, builders and other contractors to ensure that our homes are not only efficient and more sustainable but also heathy, safe, comfortable, and resilient, and more.

Thank you for considering the point of view of our important sector.

We look forward to continuing our engagement with the Minister and his office to explore opportunities where CACEA can support the work of your ministry as well ensure a sustainable profession of valued, credible and respected EAs.

Sincerely,

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Cindy Gareau Executive Director <u>manager@cacea.ca</u>