CACEA Canadian Association of Consulting Energy Advisors

July 18, 2025

CleanBC Review Independent Panel
CleanBCReview@gov.bc.ca

Cc: Cindy Gareau, CACEA Executive Director
manager@cacea.ca

Re: CleanBC Review and Recommendations from CACEA

To Whom it May Concern:

The Canadian Association of Consulting Energy Advisors (CACEA) would like to provide our feedback for the CleanBC Review currently underway. CACEA is a not-for-profit organization representing Energy Advisors (EAs) registered by Natural Resources Canada across the country, with a strong membership base in the province of British Columbia (BC). Our members' area of expertise is in new and existing Part 9 residential and low-rise buildings, and as such the feedback provided below is specific to these archetypes.

To-date, CleanBC has provided the opportunities and incentives for BC to become a leader in energy-efficient new residential construction through the introduction of the BC Energy Step Code. As a performance-path code compliance option, the Step Code has improved the building industry beyond just environmental benefits; across the province, the builder community is now constructing more durable, comfortable, healthy and energy efficient homes.

The phased rollout of the Step Code was done in a constructive way that allowed for industry preparedness and the development of supporting resources. This included mandatory air tightness testing and energy modelling (Step 1) and the training of additional Energy Advisors (EA) to support the demand for their work in energy modelling and on-site testing. Maintaining multiple compliance pathways within the building code has also been beneficial to builders.

Recommendations

1. **Mandatory home labelling for all existing homes and energy assessment renewed at time of point of sale**

The BC Home Energy Planner introduces homeowners across the province to the energy efficiency of their home. However, to truly make an impact in the understanding and implementation of energy efficiency upgrades in existing homes, mandatory whole-home EnerGuide energy evaluations must be completed by a registered EA. By working with an EA, homeowners will have a much clearer picture of the current performance of their home and receive tailored upgrade recommendations. By considering the house-as-a-system, an EA can ensure that any upgrades made consider energy savings, greenhouse gas emissions (GHG), building science principles, building envelope durability, and the health and safety of occupants. Requiring an energy assessment at the point-of-sale can provide incentive for the existing homeowner to complete

upgrades while they still occupy the home (providing them the aforementioned benefits). In addition, introducing minimum performance requirements at the point-of-sale can ensure the continued improvement of existing homes across the province. A policy such as this has been mandatory for landlords and sellers in France since 2022; more information on their Energy Performance Certificate and point-of-sale requirements can be found in the footnotes[1].

2. Support and recognition of Energy Advisors as a licensed experts educated in building science, house as a system, other building efficiency, health and safety and durability concerns

Energy Advisors (EA) are currently tested and licenced by Natural Resources Canada. Their work in BC is currently supported through the BC Energy Step Code (new construction) and utility, municipal or partner-organization financial incentives (existing construction). Through their dedication to building science, energy efficiency, occupant health, comfort and safety and innovative design, many CACEA EAs have expanded their skillset and business services to provide more than just program-based labels. CACEA encourages the province and all associated partners to consider the expanded skillset of EAs when considering future energy efficiency and resiliency policies for new and existing homes. By the nature of their license agreement, EAs act as an independent third-party to provide recommendations that maximize the efficiency, affordability, health, safety and comfort of the home for its occupants.

The modelling, on site testing and verification of energy efficient performance measured by EAs plays a critical role in ensuring the health, safety, durability and performance of a new home. Smaller communities currently not served by an EA may experience higher travel costs and potential delays when demonstrating compliance with the BC Energy Step Code. A recommended solution is CACEA's *Field Technician* designation. Through training created and administered by CACEA, individual technicians can perform the on-site data collection and testing required to complete an energy assessment of a new home. Working under an CACEA EA member registered with Natural Resources Canada, the Field Technician may be located in rural or remote communities, alleviating the requirement for the EA to travel to site. In addition, the creation of the Field Technician program provides more job opportunities to those interested in working in new construction while allowing highly experienced EAs, like CACEAs Master Energy Advisors (MEAs) to focus their time on more skilled and technical aspects of their field.

CACEA is continuing to develop the Field Technician designation and encourages the province to support this position. In doing so, we can help reduce the cost of new construction and time delays while ensuring homes are still built to a high standard of efficiency, durability, and occupant health.

1. https://www.frenchentree.com/french-property/selling-homes/french-property-need-to-know-energy-performance-certificates/
2. https://www.homeperformance.ca/wp-content/uploads/2020/02/202002_HPSC_HASS_InfoSheet.pdf

3. Support energy efficient upgrades for homes based on building science

The current and historical trend of linking rebates to individual mechanical system or envelope upgrades does not allow for whole-house considerations to be made. CACEA encourages future incentive programs to be designed using the *house-as-a-system*[2] approach, applying the results of an energy assessment conducted by a registered EA to provide a clear renovation roadmap that prioritization the root causes of energy loss before focusing on mechanical system replacements. While the installation of heat pumps has become the primary focus of many retrofit programs, this measure alone does not resolve major issues related to uncontrolled heat loss through poorly performing building envelopes. Improving insulation levels and airtightness not only reduces overall energy demand but also enables right-sizing of heating and cooling equipment, resulting in cost savings for homeowners and long-term emissions reductions. In addition, certain technologies—such as heat pump water heaters—are often overlooked despite the fact that water heating is typically the second largest energy use in a home. Supporting the adoption of these emerging technologies can help households achieve significant energy savings while improving year-round comfort.

Focusing incentives on an individual home basis can be integrated into or be supported through mandatory point-of-sale energy assessments and upgrades for less efficient homes. Support for these concepts can also be provided through the adoption of Property Assessed Clean Energy (PACE) legislation, which is used to finance energy efficiency upgrades.

4. Include multiple compliance pathways for energy efficient upgrades and eliminate boom-bust incentive cycles

The majority of homeowners and building industry professionals agree that we need to reduce the carbon footprint of existing homes in the province. However, as a geographically diverse province with two primary home-energy sources, it is important to understand that a 'one-size-fits-all' approach will not work for all existing homes when it comes to building envelope, mechanical systems and energy efficiency upgrades. CACEA encourages the province to follow a similar approach to that implemented under the Step Code, which provides both performance- and prescriptive based options for new homes to demonstrate compliance with the mechanical and envelope efficiency requirements. In addition, consideration for the availability of licensed professionals, equipment and materials and climate zone when setting performance targets can help direct policy development and education and outreach directives. It is also recommended that incentive boom-bust incentive cycles be terminated. The repetition of introducing and ending incentive programs often leave homeowners confused or frustrated as the programs can be misaligned with time of sale, individual financial ability and interest. Incentive cycles such as these also create boom-and-bust trends for residential renovation and contracting companies, including trades and EAs which impacts capacity as well as levels of practical knowledge and expertise.

1. https://www.frenchentree.com/french-property/selling-homes/french-property-need-to-know-energy-performance-certificates/
2. https://www.homeperformance.ca/wp-content/uploads/2020/02/202002_HPSC_HASS_InfoSheet.pdf

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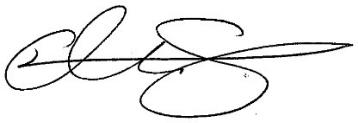
We appreciate the opportunity to provide our comments and feedback to the Embodied GHG draft policy position, currently being developed by the CBHCC. Should you have any questions or require clarification on any of the points discussed above, please don't hesitate to contact us.

Sincerely,



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1. https://www.frenchentree.com/french-property/selling-homes/french-property-need-to-know-energy-performance-certificates/
2. https://www.homeperformance.ca/wp-content/uploads/2020/02/202002_HPSC_HASS_InfoSheet.pdf