

February 26, 2026

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CC: Cindy Gareau
Executive Director
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To the NRCAN Technical and QA Team,

The Canadian Association of Consulting Energy Advisors (CACEA) would like to thank Natural Resources Canada (NRCAN) for the opportunity to review and provide feedback on the proposed updates to the EnerGuide Rating System (ERS) Administrative Procedures and Quality Assurance (QA) Procedures, as outlined in the consultation presentation shared on December 11, 2025, and January 29, 2026.

CACEA represents Energy Advisors (EA), and by extension, many Service Organizations (SO) and EAs that hold the Quality Assurance Specialist (QAS) designation working across Canada. Our association is a strong proponent of the continued evolution of the ERS procedures to ensure technical precision, program integrity, and public confidence. Overall, we are supportive of the intent and direction of the proposed QAS changes presented in version 15.13a.

CACEA recognizes and supports emphasis on:

- A clearer differentiation between training and examination/assessment functions within the probationary file process.
- Strengthened qualification requirements for examiners/experienced EAs and QASs.
- Improved oversight and consistency within internal and external QA activities.

We would like to offer a few additional considerations:

1. Consistent Interpretation and Application of QA(Specialist/Auditor) Approach and Practices

It is important to ensure consistency in the interpretation and application of QA(S/A) approaches and practices across the country. Given that QA activities are conducted by a combination of third-party providers, SOs, and NRCAN internal staff, even well-defined procedures may be interpreted and applied differently if expectations and approaches vary.

With that in mind, CACEA's recommends that NRCAN provide a national guidance document or detailed reference framework for QASs and probationary file assessors, e.g., experienced EAs, that expands on and complements the formal Administrative and Quality Assurance Procedures. This resource goes beyond the Administrative Procedures document. It would serve as a best practice document and support more consistent approaches to file review, assessment oversight, and procedural interpretation, while still allowing for flexibility and individual business structures.

In addition, procedures for Existing Home evaluations, New Home Construction evaluations, and by extension, Code Compliance work would benefit from tailored guidance to facilitate consistent QA approaches for each stream.

CACEA would welcome the opportunity to collaborate on the development of this initiative. Our membership includes many experienced QASs and experienced EAs possessing practical insights would complement NRCAN's policy and program expertise.

2. Recommended Best Practice

A more *proactive* approach to QA procedures (prior to submission to the NRCAN database) may be more effective in the long term than the current approach. While we appreciate some SOs already practice a pre-emptive review of a percentage of files, establishing a recommended best practice that encourages more QA before submissions may benefit the industry and NRCAN.

3. File Submission Deadline

There may be benefits to extending the current file submission deadline of 14 days for EA to SO submissions, and 30 days for the SO to the NRCAN database). Expanding the SO-to-NRCAN deadline to a proposed 60-day requirement would enable more proactive QA activities, file revisions, and EA upskilling without the pressure of immediate compliance guidelines.

This extension would also reflect the current realities of additional effort and documentation required to review New Home Construction files, building code compliance requirements, and voluntary programs such as CHBA Net Zero, ENERGY STAR® for New Homes.

The collection of proper documentation to support full data submissions often requires additional time and efforts from an SO and QAS during the final stages of submission. This may also include considerations such as the expiration and renewal of builder licenses required for submission to the NRCAN database.

Somewhat related to timelines, timely communication between NRCAN, QAS/SOs, and EAs is essential. Several members noted that when clarification is required, NRCAN's responsiveness to inquiries can be inconsistent, which may impact the QAS's ability to review files and ensure corrections are made within the prescribed timeframe.

4. Level 3 QA

NRCAN's Level 3 QA is recognized by industry to be integral to the ERS procedures, supporting the skills of EAs, SOs and QASs, as well as the overall quality of the database. Based on CACEA member feedback, we recommend that NRCAN review the level of detail required in the Level 3 checklist.

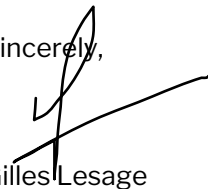
While we appreciate the importance of file consistency and data reliability, it is also important to assess which items meaningfully impact the overall efficiency outcome of a file versus that that do not. Currently, comments may focus on items that are less impactful where as larger, while more significant factors, such as the interpretation of assumed assemblies for existing homes versus actual modelled window performance, may have a greater impact on results.

CACEA believes there is a clear opportunity for the QA process to evolve toward a more proactive, efficient, and outcome-focused model. These improvements would strengthen consistency, reduce administrative burden, and enhance confidence in ERS delivery across all regions and service models.

For your reference, CACEA has established a QAS Member Working Group to provide ongoing support, collaboration and feedback within CACEA and available for collaboration with NRCAN's Technical and QA team, helping to maintain open lines of communication.

Thank you for the opportunity to provide input. We strongly encourage NRCAN to consider these recommendations as part of the finalization of the proposed changes. CACEA remains committed to supporting implementation and to representing the practical realities faced by EAs and SOs across Canada.

Sincerely,



Gilles Lesage
Technical Liaison Director
Canadian Association of Consulting Energy Advisors (CACEA)