November 27, 2026

The Honourable Cathie Ounsted
Minister of Local Government, Housing, Sport and Culture
PO Box 9041, Stn Prov Govt
Victoria, BC V8W 9E1
Email: HMA.minister@gov.bc.ca

Re: Supporting Your Step Code Mandate: An Offer from BC's Energy Advisors

Dear Minister Ounsted,

On behalf of the Canadian Association of Consulting Energy Advisors (CACEA), our BC membership, and the Energy Advisors working throughout the province, congratulations on your appointment as Minister of Local Government, Housing, Sport and Culture. Founded in 2017, CACEA is the national voice for Energy Advisors, who improve the energy efficiency, resilience and comfort of new and existing homes, and serves as a trusted resource for homeowners, industry partners and policymakers. We look forward to working with you, Minister of State for Housing Wahla and your ministry to make housing more attainable for British Columbians.

CACEA supports your mandate to overhaul the Step Code and to limit municipal building requirements beyond the BC Building Code. To help deliver affordable, high-quality homes faster, **we respectfully ask that your government:** (1) retain the Step Code performance path; (2) keep independent verification; (3) put Energy Advisors' expertise to work for affordability; and (4) maintain Step 3 as the provincial minimum, with no immediate timeline to increase it. Each is explained below.

Energy Advisors are impartial, federally registered Part 9 residential construction professionals, trained in building science and in assessing the house as a system, whose work provides the technical basis for balancing the affordability, comfort and durability of BC's housing stock. Our members use their in-depth knowledge of residential construction to help builders and renovators select the envelope systems, products and equipment best suited to each project's goals, regardless of fuel type. Energy Advisors also strengthen resilience: with longer wildfire seasons and more frequent heat waves, they help builders choose materials and designs that resist embers, build airtight envelopes that keep smoke out, and prevent dangerous indoor overheating, supporting your government's commitment to prepare communities for wildfires.

CACEA shares your government's goal of making housing more attainable, and we welcome your mandate to shorten development approvals and reduce unnecessary municipal requirements. Developers, builders, utilities and jurisdictions already rely on Energy Advisors throughout the construction process, giving them first-hand insight into what is working and what is not. Greater reliance on Energy Advisors' compliance reports

could also shorten permit reviews in building departments. Energy Advisors are proven, independent professionals relied upon across BC's residential construction industry.

Energy Advisors are ready to help deliver on your mandate. We look forward to collaborating with your ministry and industry partners on changes that work for builders and homeowners, while respecting the role of local governments and authorities having jurisdiction.

Our position rests on four principles that align with your mandate:

1. **Retain the performance path.** BC's Energy Step Code sets the results a home must achieve, without prescribing how to achieve them. This proven, outcome-based approach reflects your government's direction: one set of clear, consistent rules, with qualified professionals free to choose how best to meet them. It also offers a practical answer to the additional municipal requirements your mandate seeks to limit: performance modelling regularly shows that a home meets its target without the costly add-ons a local bylaw would otherwise require (see Appendix). This flexibility lets builders work with Energy Advisors to choose the most practical and affordable approach for each project, while ensuring homes remain affordable, comfortable and durable for decades.
2. **Keep verification.** The Premier has asked every minister to set out expected outcomes and how results will be measured. The EnerGuide modelling, testing and reporting performed by Energy Advisors provides measured data on every home, for a very small fraction of its construction cost. It is among the most effective ways to catch problems before they become costly to fix, and it gives government a reliable dataset to measure results and inform future policy. Verification has also been central to raising the standard of BC home construction through builder education and accountable results.
3. **Put Energy Advisors' expertise to work for affordability.** Energy Advisors advise on window and insulation selection, and many are qualified to ensure ventilation, heating and cooling systems are properly designed and sized, so homes stay comfortable year-round, including through heat waves and wildfire smoke events. The result is lower operating costs for homeowners and less strain on BC's energy systems. In short, Energy Advisors help builders find the most affordable way to deliver the homes that British Columbians want, whether they choose electricity or natural gas as their primary source of energy. This fuel-neutral approach aligns with your mandate to review municipal bans on gas connections and mandatory heating technologies.
4. **Maintain Step 3 as the provincial minimum.** British Columbians need housing that is affordable and built quickly. With this in mind, we fully support maintaining Step 3 as the provincial minimum for the Energy Step Code, with no immediate timeline to increase this minimum. For the Zero Carbon Step Code, maintaining EL-1 as the provincial minimum balances monitoring emissions from our housing stock with preserving fuel choice. One provincial minimum, with municipal requirements above it limited as your mandate directs, gives builders a single, predictable target across BC. Builders already

work with Energy Advisors to meet Step 3 cost-effectively, so maintaining it builds on established practice. Any future changes should come with ample notice, so builders can take on new projects without unexpected costs. A return to prescriptive-only compliance would increase costs, introduce delays and remove the data needed to inform future policy.

CACEA members have worked with the Step Code since it was introduced in 2017. Our members serve on multiple committees, including the BC Building Code's Part 9 sub-committee, and with home builders' associations across the country. They deliver training for builders, renovators and residential construction trades, and act as the integrators who keep construction running smoothly. With members who have modelled, tested and reported on code compliance for tens of thousands of homes, CACEA would welcome the opportunity to put this experience to work as your government overhauls the Step Code.

Specifically, CACEA offers:

- a technical briefing for ministry staff on how the performance path and verification work in practice;
- BC field data and case examples from member projects to inform the review; and
- experienced Energy Advisors to serve on any Step Code review committee or working group.

Because Energy Advisors' work touches several portfolios, we are also sharing our perspective with your cabinet colleagues responsible for energy, emergency management, the environment, finance and red tape reduction. We respectfully request the opportunity to meet with you and your team in the first months of your mandate. We look forward to helping your government deliver affordable, comfortable, durable, and resilient homes for British Columbians. CACEA will follow up with your office in the coming weeks to arrange a meeting. In the meantime, please contact Cindy Gareau at manager@cacea.ca or 888-315-2774 with any questions.

Respectfully,



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Enclosure: Field examples from BC Energy Advisors

cc: The Honourable Zeeshan Wahla, Minister of State for Housing; Jonathan Dube, Deputy Minister, Ministry of Local Government, Housing, Sport and Culture; The Honourable Gavin Dew, MLA for Kelowna-Mission; CACEA Board of Directors

Appendix: Field examples from BC Energy Advisors

These examples come from CACEA members' recent work in communities across British Columbia.

Lower cost through the performance path

- **Modular home, Step 5:** modelling several upgrade packages found one that reached Step 5 with no exterior insulation, using better glazing, crawlspace insulation and airtightness instead. The builder found this combination to be the cheapest for their plant to build.
- **Owner-built log home:** performance modelling showed the home met its target without window upgrades a local bylaw would otherwise have required, saving the owner tens of thousands of dollars.

Problems caught by testing

- **Disconnected fireplace duct:** at final testing, an advisor noticed a home testing unusually high for its builder and traced the leak to a fireplace duct disconnected during installation. Had the owners lit a fire, smoke could have entered the home and threatened the lives of the occupants. No visual inspection would have caught it.
- **Skipped testing:** owner-builders who skip mid-construction testing against advice regularly spend more than $10,000 air sealing a finished house. Mid-construction testing costs a small fraction of that.

Right-sized heating and cooling

- **Step 5 home, Kelowna (1,146 sq. ft.):** heat loss of 10,970 BTU/h, but a 56,700 BTU/h gas furnace was installed, about five times the need. This furnace is expected to fail earlier than typical, and is unlikely to deliver consistent heating during operation.
- **HVAC contractors:** some now refuse to quote equipment without the Energy Advisor's heat loss / heat gain report, using it to protect themselves against callbacks.

Healthier homes

- **Wildfire smoke:** owners of an existing home had smoke entering whenever bath fans or the range hood ran. Blower door diagnostics found an open make-up air pipe, a fresh-air intake tied into return ducts, leaky pot lights and exhaust dampers that didn't close: the same leaks that waste heat in winter were causing the indoor air to be smoky in the summer.

Support for building officials

- In small communities where a building department may be one or two people, officials regularly call Energy Advisors to interpret Code changes. Building officials report that Energy Advisors are trusted, qualified resources who help homeowners reach code compliance.