November 27, 2026

The Honourable Zeeshan Wahla
Minister of State for Housing
Parliament Buildings
Victoria, BC V8V 1X4
Email: Zeeshan.Wahla.MLA@leg.bc.ca

Re: Supporting Your Building Code Review and Step Code Overhaul

Dear Minister Wahla,

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 State for Housing. 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. As a professional engineer, you bring valuable technical perspective to the housing file, and we look forward to working with you.

Your mandate directs you to review the Building Code, overhaul the Step Code and recommend reforms that lower construction costs and remove unnecessary building requirements, and to shorten development approvals from years to months. CACEA supports this work, and Energy Advisors are ready to help deliver it.

We respectfully ask that your review: (1) retain the Step Code performance path; (2) keep independent verification; (3) maintain Step 3 as the provincial minimum, with no immediate timeline to increase it; and (4) draw on Energy Advisors' field experience to identify what is working and what is not.

Energy Advisors are impartial, federally registered Part 9 residential construction professionals, trained in building science and in assessing the house as a system, who model, test and report on code compliance for homes across BC. Developers, builders, utilities and building officials rely on Energy Advisors every day, so they see first-hand which requirements add value and which only add cost.

1. **The performance path lowers costs.** Like any sound standard, it sets the result and leaves qualified professionals free to choose how to achieve it. Energy Advisors' modelling regularly identifies lower-cost solutions. In recent member projects, one modular builder reached Step 5 without exterior insulation, and an owner-built log home met its target without window upgrades that a local bylaw would have required, saving the owner tens of thousands of dollars.
2. **Verification protects homeowners and informs government.** EnerGuide testing provides measured data on every home. It catches defects before they are hidden. For example, in one home, testing by a CACEA member found a fireplace duct disconnected

during installation that could have drawn smoke into the living space and endangered the occupants. It also provides government with the data needed to measure the results of its reforms.

3. **One provincial minimum gives builders certainty.** Maintaining Step 3 as the provincial minimum gives builders a single, predictable target across BC, particularly as your government limits municipal requirements above the Building Code. Builders already work with Energy Advisors to meet Step 3 cost-effectively, so maintaining it builds on established practice. Ample notice of any future changes would allow builders to plan projects without unexpected costs.
4. **Energy Advisors can help speed approvals.** The BC Energy Compliance Reports already support building permit and occupancy decisions. Making reporting consistent across the province, and placing greater reliance on qualified Energy Advisors, would shorten review times in building departments, many of which have only one or two staff.

A return to prescriptive-only compliance would increase costs, remove builders' flexibility and eliminate the data needed to measure results. We have shared these views with Minister Ounsted and look forward to working with you both.

Specifically, CACEA offers:

- a technical working session with you and your 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 Building Code or Step Code review committee or working group.

We respectfully request the opportunity to meet with you and your team in the coming months. 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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cc: The Honourable Cathie Ounsted, Minister of Local Government, Housing, Sport and Culture; Jonathan Dube, Deputy Minister, Ministry of Local Government, Housing, Sport and Culture; The Honourable Gavin Dew, MLA for Kelowna-Mission; CACEA Board of Directors