November 1, 2024

**Attn:**  Ministry of Energy and Electrification

777 Bay St.

Toronto, Ontario

**Re:**  City of Kitchener staff comments on the proposed 2025-2036 Electricity Energy Efficiency Framework

Environmental Registry of Ontario Posting: 019-9235

The City of Kitchener has long recognized the tremendous value and opportunity involved in planning for the energy transition. Kitchener applauds the Province of Ontario's recent action towards integrated energy planning to fuel Ontario’s growing economy, make energy more affordable, and reduce province-wide emissions.

Over the past decade, Kitchener has played a leading role in developing local capacity for integrated community energy planning. By collaborating closely with the Region of Waterloo, area municipalities, and local utilities, Kitchener has implemented innovative solutions and strategies to advance the local energy system to reduce emissions while still effectively meeting local energy needs.

We appreciate the opportunity to provide feedback on the Province’s proposed electricity energy efficiency framework and would like to emphasize three key points:

* It is essential that Kitchener Utilities customers have access to the same energy efficiency programs set out in the new Framework that are available to Enbridge customers.
* Local utilities should be responsible for implementing energy efficiency programs, leveraging their partnerships with community contractors and energy auditors to improve customer service.
* Energy efficiency programs are essential for supporting vulnerable community members and ensuring affordable energy access, and the province should prioritize initiatives that specifically address the needs of renters.

**Program eligibility – Kitchener Utilities**

Kitchener Utilities (KU) has been fundamental to community energy planning success. As one of only two municipally owned natural gas distribution utilities in Ontario, KU has garnered strong relationships with customers and local partners.

Kitchener underscores the importance of the Electricity Energy Efficiency Framework to include opportunities for local utility companies, such as Kitchener Utilities and Enova (our electricity LDC), to develop customized energy efficiency programs at the local level.

There is local concern that Kitchener customers may be overlooked as new gas EE programs only eligible to Enbridge customers are introduced through the proposed Framework and delivered through the one-window model, which could lead to confusion and frustration among the community. It is essential that KU customers have access to the same energy efficiency programs available to Enbridge customers, ensuring that Kitchener residents are not overlooked in these important initiatives aimed at making energy more affordable.

**Optimal Customer Service and Knowledge of Local Needs**

Building on decades of local knowledge and high levels of customer trust in our community-owned utility, KU is ideally positioned to play a significant leadership role in supporting residential customers’ access to EE programs and ensure programming meets local customer needs. This is especially the case given the strong local relationships between Enova and KU.

Furthermore, we encourage the Province to enable local utilities to collaborate with local contractors and energy auditors to deliver EE programs. Local providers possess a deep understanding of the market and are well-known in the community, which fosters better customer service. Kitchener residents receive the same messaging and advertising as adjacent Enbridge customers do. Since customers often call both KU and Enbridge about rebate programs for which they are not eligible, this leads to inefficiency and additional project overhead for utilities

A localized approach will provide greater clarity to residents, ensuring that energy programs are tailored to the specific needs of the Kitchener community rather than employing a one-size-fits-all strategy.

**Equitable Energy Efficiency Programming**

Kitchener is committed to improving the wellbeing of, and reducing negative impacts on, equity deserving groups. Energy efficiency programs are a critical opportunity to support those who are most vulnerable in our communities and ensure they have affordable access to the energy they need.

During community consultations for the Kitchener Utilities Clean Energy Transition Strategy in 2023, a critical concern was raised about programs and supports for renters, who make up 40.3% of Kitchener’s community. Renters are typically not included in energy efficiency programs because landlords usually own the energy equipment, while renters are often left responsible for the utility bills. As a result, landlords lack the incentive to upgrade equipment for energy savings, leaving renters to bear the burden of high energy costs. Educational and marketing campaigns aimed at landlords to increase awareness and participation in energy efficiency programs will ultimately lead to cost-saving benefits for renters and should be included in the Framework.