

ABOUT ENERLIFE CONSULTING INC.

www.enerlife.com

Based in Toronto, Enerlife Consulting Inc. is a North American leader in energy efficiency for commercial, institutional and multi-residential buildings. We monitor energy use data for thousands of buildings in Ontario, across Canada and the United States and in Europe. We work with hundreds of building owners, including commercial offices, school boards, hospitals and municipalities, applying data analytics to identify energy efficiency measures, implement improvements and verify savings. We are responsible for a growing number of buildings which are among the most energy efficient in North America.

Enerlife is also leading the low carbon energy transition for commercial buildings. We have documented the necessity to first achieve high levels of energy efficiency in order to make decarbonization and electrification affordable. We have shown that most commercial buildings can displace a substantial portion of fossil fuel combustion without adding demand to the electrical grid.

Enerlife represents the Building Owners and Managers Association (BOMA) in regulatory hearings at the Ontario Energy Board (OEB). We have a multi-year contract with NRCan to document actual energy efficiency of recently opened buildings across Canada, and to recommend code and process improvements to deliver consistently high energy performance for new construction. We advise Enbridge Gas and the Independent Electricity System Operator (IESO) on energy efficiency program design. We freely share our latest knowledge and data through workshops and webinars attended by hundreds of people each year.

As such, Enerlife has unique influence, knowledge and insight into actual energy trends in the commercial building sector, the characteristics of high energy performing buildings, electricity and natural gas load forecasting, and the nature and magnitude of the real energy savings potential.

PROPOSAL

Ministry of Municipal Affairs and Housing's Proposed legislative changes to the Planning Act, City of Toronto Act, 2006, Building Code Act, 1992 and Municipal Act, 2001 Changes (Schedules 1,2 and 7 of Bill 98, the Building Homes and Improving Transportation Infrastructure Act, 2026)

1. *Complementary Changes to Support Implementation of Streamlining and Standardizing Official Plans:*

Changes are proposed to the *Planning Act* to support implementation of the proposed new official plan framework, including:

- Removing redundant requirement for municipalities to include climate change policies in their official plans,

2. Site Plan: Prohibit Mandatory Municipal Enhanced Development Standards and Green Building Standards:

Changes are proposed to the Planning Act, Municipal Act, 2001, Building Code Act, 1992, and City of Toronto Act, 2006 that would have the effect of:

- removing municipal authority to require certain mandatory Enhanced Development Standards (EDS) at the lot level, outside of buildings (e.g., green development standards), that are not specifically required for health or safety (e.g., stormwater management)
- providing even greater clarity that green building/construction standards are voluntary and cannot be imposed by municipalities.

Specifically, the proposed changes would:

- expressly provide that mandatory green building/construction standards are not permitted, including as part of site plan control, and
- remove provisions that would have authorized municipalities to require green building standards, if the government had made enabling regulatory amendments (i.e., a green pick list).

ENERLIFE RECOMMENDATIONS

Municipalities should continue to be required to include climate change policies in their official plans. Municipalities should also continue to have the authority to require and impose certain mandatory Enhanced Development Standards (EDS), such as green development standards.

Municipalities' above code, performance-based energy efficiency and climate change policies have been inspiring and effective in lowering energy bills, improving comfort and reducing greenhouse gas emissions in local infrastructure.

Removing this requirement and authority will have long-lasting negative impact on building performance, energy costs and it will further delay the progress of decarbonization and greenhouse gas emissions targets. Low performance buildings require higher energy costs, which will eventually be shifted to building owners and tenants. Retrofits in the future will be less effective, more costly and disruptive for building occupants. Low performance buildings also increase the capacity requirements of utilities' infrastructure, which will cause higher electricity and natural gas bills for Ontario's rate payers.