

June 14th, 2018

Debbie Scharf
Director
Equipment Division
Office of Energy Efficiency
Natural Resources Canada
930 Carling Avenue, Building 3, 1st Floor
Ottawa, Ontario


Re: Amendment 14 to the Energy Efficiency Regulations

Dear Debbie Scharf,

The Atmospheric Fund (TAF) is a public agency established in 1991 by the City of Toronto and endowed by the City and the Province of Ontario. TAF works closely with stakeholders across the Greater Toronto and Hamilton Area (GTHA) to test and advance innovative programs to reduce greenhouse gas (GHG) emissions and air pollution. However, the views expressed in this submission do not necessarily represent those of the City of Toronto, the Province of Ontario or other GTHA stakeholders.

TAF is pleased to see the Federal Government moving forward with updates to Canada's Energy Efficiency Regulations through Amendment 14. TAF believes that energy efficiency regulations are a key tool for accelerating improvements in energy efficiency and driving deep reductions in carbon emissions. In addition to the direct emissions reductions associated with more efficient appliances and equipment, energy efficiency standards also facilitate the transition to clean renewable power by reducing overall demand. Given Canada's commitment to the Paris Agreement, we must take quick and decisive action to limit our GHG emissions. Amendments to the Energy Efficiency Regulations are a quick and efficient way to begin delivering on our climate commitments.

In addition to driving significant carbon emissions reductions, the proposed energy efficiency requirements will also reduce utility costs and increase energy productivity for households and businesses across Canada. According to Natural Resources Canada's calculations, the present value of the energy costs savings to Canadians from these updated regulations is over \$4.8B; these cost savings can be expected to be recycled into more productive areas of the economy, creating new jobs and benefits beyond those accounted for in the analysis. Even without taking into account these secondary effects, the net present value of the efficiency



requirements in Amendment 14 is estimated at \$4.5 billion. Clearly, the proposed standards would be justifiable on economic grounds alone, even if we were not dealing with a global climate crisis!

TAF would like to thank Natural Resources Canada for their recent work on the changes to the Energy Efficiency Act, including the changes implemented through Amendment 14. TAF supports the increasing of energy efficiency targets for appliances and equipment in Canada as an important step in meeting our climate targets and growing the clean economy.

Sincerely,

Bryan Purcell
Director, Policy & Programs
The Atmospheric Fund