

November 30, 2018

Jamie Hulan
Director
Equipment Division
Natural Resources Canada

Re: Comments on Energy Efficient Fenestration Products - a Unified Strategy Across Canada

Dear Mr. Hulan,

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.


Efficiency Canada advocates to make our country a global leader in energy efficiency. We convene people from across Canada's economy to work together to advance policies required to take full advantage of energy efficiency. And we communicate the best research out there to build a more productive economy, sustainable environment, and better life for Canadians.

TAF and Efficiency Canada would like to thank Natural Resources Canada for the opportunity to provide input on the proposed regulatory strategy for energy efficient fenestration products across Canada.

General Comments

We strongly support the introduction of Minimum Energy Performance Standards (MEPS) for fenestration products as part of a comprehensive market transformation strategy. As noted in the discussion paper, MEPS are among the most cost-effective energy efficiency and carbon-reduction policy options available. When integrated with a broader suite of market transformation tools, MEPS can drive a virtuous cycle of innovation while also serving an important consumer protection purpose.

We strongly support the aspiration goals for window efficiency adopted by the FPT governments in Market transformation Strategies for energy-using equipment in the



building sector. The introduction of MEPS for windows and other fenestration products is absolutely critical to the achievement of these aspirational goals. Additionally, fenestration standards will also be critical to achieving the aspirational goals for space heating equipment in a cost-effective manner. The proposed transition to heating equipment with greater than 100% efficiency will be difficult to manage without dramatically improving the thermal performance of buildings through high performance fenestration products.

Question 1b: Phase-in Scenarios

We recommend the introduction of performance standards for windows and glass doors in 2022 (Scenario A). The proposed Tier 1 performance standards for windows and glass doors are achievable by 2022 and have already been the basis of ongoing dialogue with the fenestration industry over the past eighteen months. They are also consistent with the aspirational 2022 goals endorsed by the FPT governments.

Questions 3a & 3b: MEP Scenarios

Canada should introduce all three tiers of MEPS in the new regulation (i.e. Scenario A). Achieving the long-term aspirational goals cost-effectively requires providing the fenestration industry with the greatest possible degree of regulatory certainty. The industry will discount the longer-term aspirational goals if they are not included in regulation. Including the later tiers in regulation from the beginning will encourage the long-term investments needed to achieve the Tier 3 standard by 2030.

We strongly oppose delaying the introduction of MEPS into tier 2 (2025). Delaying the introduction of MEPS will signal a lack of commitment to the aspirational goals, undermining industry confidence in the market transformation strategy. A reporting and labelling requirement will not be effective in driving product improvement because the consumers who are likely to respond to this information are already likely to purchase Energy Star rated windows. Additionally, it is important to recognize that residential windows have a very long lifetime and the windows installed in 2022 are likely to remain in service into the 2050s. Achieving the dramatic carbon emission reductions required by mid-century will be all the more difficult if we allow the continued installation of low-performance windows until 2025.

Questions 5a & b: Labelling

We support the introduction of an EnerGuide type label for windows. U-Factor, SHGC, visible transmittance and air leakage would be the most important performance metrics to include. However, it must be recognized that consumers have limited familiarity with all of these metrics. For example, many consumers would not know whether a higher or lower U-Factor was desirable. The government should consider whether simpler information could be included to help consumers understand relative



product performance. For example, a performance grade (A,B,C,D), or a scale illustrating how the product U-Factor relates to both the MEPS and Energy Star specification.

Conclusion

We urge the government to move quickly to introduce MEPS for fenestration products by 2022 to support the Pan-Canadian Framework on Clean Growth and Climate Change and our international climate commitments. The introduction of national fenestration MEPS is long overdue and is a critical component of the market transformation strategy endorsed by the FPT governments. Deferring the introduction of MEPS until 2025 will delay the predictable energy performance improvements they will provide, while undermining industry confidence in the market transformation strategy.

In order to achieve the long-term aspiration goals for window efficiency, the government must create the long-term policy certainty that will enable investment in the next generation of fenestration products. The best way to do this is by introducing all three tiers of MEPS in the initial regulation; this will promote a smooth transition for industry stakeholders and establish an equal playing field for suppliers.

While the long-term goals are ambitious, Canada must act with urgency to address the global climate crisis. The introduction of window MEPS as part of a broader market transformation strategy will drive significant, predictable improvements in energy efficiency while reducing household energy costs and improving comfort. The incremental cost associated with high performance windows can be expected to drop quickly as the MEPS drive economies of scale and product innovation. In addition to achieving direct energy and carbon savings, the transition to high performance windows will also play a critical role in the cost-effective transition to low-carbon space heating technologies.

Canada needs transformative change to drive energy efficiency in buildings, and the introduction of federal standards can play a key role at a minimal cost to consumers and businesses. We look forward to continuing to work with the government on the development of the proposed regulations and the broader market transformation strategy. Please don't hesitate to contact us directly should you have any questions.

Sincerely yours,



Bryan Purcell
Director of Policy & Programs
The Atmospheric Fund



Corey Diamond
Executive Director
Efficiency Canada