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April 4th, 2016

Rebecca Teare, Policy Advisor
Ministry of Energy
77 Grenville Street, 5th Floor
Toronto, Ontario, M7A 2C1

Re: Comments on the large building energy and water reporting and benchmarking regulation proposal

To Ms. Teare,

The Ontario Building Envelope Council (OBEC) is a non-profit organization dedicated to addressing the challenges of designing, constructing and operating high performing, sustainable buildings. Our primary focus is on providing building science education including best practices and information on current trends and issues to members including practitioners in the architectural, engineering, research, manufacturing and construction communities.

OBEC strongly supports the proposed large building energy and water reporting and benchmarking regulation but would like to submit for consideration the following comments on the proposal:

1. In the proposed regulation, building owners are required to confirm that the data has been accurately reported but they are not required to have the data verified by a third party. Third party verification by a qualified professional is necessary to ensure data quality. If the data collected does not accurately represent the performance of the building stock, the utility of these data for developing policy tools is limited. We propose that this verification should occur every few years in order to keep costs reasonable for building owners while still ensuring that the data are reliable. A specific list of acceptable qualified professionals should also be included in the regulation. These professionals could include Engineers, Architects, Building Science Specialists of Ontario (BSSOs), Certified Energy Managers and others.

2. Appendix A4 of the proposed regulation contains a list of elements that are reported and identifies which will be disclosed. We propose that additional elements be added to the disclosure list including: Year Built, Weather Normalized Site Natural Gas Intensity, and Weather Normalized Site Electricity Intensity. The Year Built allows for the impact of various building code and regulation cycles to be assessed. Without this element, it is difficult to determine how historical policy changes have shaped the performance of our building stock which can help determine future directions. Access to the split between natural gas and electricity consumption is also essential to help determine which building technologies require more promotion, education and support. Furthermore, this information will be valuable to the utilities with responsibility for creating incentive programs to reduce consumption.
3. The proposed regulation explains that the Ministry of Energy will produce reports to summarize the findings from the performance data it collected. More detail is needed on how the disclosed data will be accessed by members of the public.
4. In order to prevent confusion, consistent units (e.g. kBtu/ft², kWh/ft²) for the different reporting elements should be used and the units chosen should be consistent with other codes and standards, where possible.

OBEC's Board of Directors and our members will continue to support the Province as it undertakes development and implementation of a much-needed energy reporting and benchmarking policy. We will continue to provide education on this important piece of legislation and ensure our members and their clients are prepared to use these new data in ways that benefits themselves and the environment.

Yours Sincerely,



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Marco Guzzo
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