

November 18, 2022

Honourable Rebecca Schultz  
Minister of Municipal Affairs  
Email: [minister.municipalaffairs@gov.ab.ca](mailto:minister.municipalaffairs@gov.ab.ca)

Mr. Paul Chang  
Provincial (Chief) Building Administrator at Alberta Government  
Email: [Paul.chang@gov.ab.ca](mailto:Paul.chang@gov.ab.ca)

Dear Minister Schultz and Mister Chang:

On behalf of The Canadian Association of Consulting Energy Advisors (CACEA), I am pleased to connect with you regarding the upcoming change to the Alberta Edition of the Building Code. We would like to extend an offer to explore opportunities to assist with a smooth transition and support regional consistency.

CACEA is a national association that promotes and supports Energy Advisors (EA) across the country, including those in Alberta. We are focused on elevating the level of industry professionalism, leveraging opportunities for our members, and fostering collaborative relations with stakeholders in the building and efficiency sectors. For your interest, the Association holds our EA members to a high standard requiring they provide a Service Organization verification letter, hold Errors and Omissions insurance, abide by our Code of Ethics, and maintain continuing education credits annually,

As you know, EAs are instrumental in the application of building code compliance across the Province. They also play a pivotal role, interfacing with service providers and manufactures, builders, renovators, different orders of governments, utilities, building officials, homeowners, and more. EAs perform necessary third-party inspections, tests, and energy modelling to verify compliance with home labeling programs such as the EnerGuide Rating System, ENERGY STAR® for New Homes Program, R-2000, CHBA Net Zero home program and BUILT GREEN® – work that is also recognized in building codes across the country. In addition, they are a valued partner and resource, renowned for their expertise in building science, the building envelope, as well as performance and compliance pathways, and provide a centralized point of contact for stakeholders such as municipalities, utilities, building officials, builders and developers, homeowners and many others who are increasingly relying on EAs for guidance, knowledge, and professionalism.

There are several areas where we believe we can assist and support your portfolio and mandates.

1. Affordability

- CACEA and our members understand that energy efficient homes reduce energy costs for the residents – allowing them to spend their money on other important needs. Involving trained energy professionals, such as EAs, can help to ensure that homes are built cost effectively while also meeting energy targets. It is a win-win for everyone.

2. Quality Professionals:

- Accountability for the validity and accuracy of the 9.36 calculations and modelling is very important. While the past has demonstrated that these services should not be limited to only Engineers and Architects, at the same time allowing any one, regardless of training or registration, provide compliance documentation or calculations carries unnecessary risks. With proposed changes to the Alberta Edition of the NBC, Section 9.36.5.3 directly adds EnerGuide into the Alberta Building Code resulting in a higher degree of confidence in code compliance reports based on EnerGuide. The process to produce this label has a defined and repeatable process as well as an associated quality assurance requirement and EAs are specifically trained and licensed by Natural Resources Canada to deliver the EnerGuide label. When not relying on registered or licenced EA, AHJ lose an important ability to regulate dishonest or unprofessional behavior with no regulator or association to report to, and no threat of delicensing possible.
- CACEA recommends that the Province follow the lead of the Canadian Mortgage and Hosing Corporation (CMHC) through their [MLI Select program](#) by clarifying “qualified professionals” in this field of energy modeling, as referred to below:

*“Qualified Professional: The Energy and Green House Gas (GHG) emission reduction analysis must be conducted by a qualified professional. For Part 3 construction, this includes professionals with energy modelling experience such as a Professional Engineer, Architect, Certified Engineering Technologist (CET) or Certified Energy Manager (CEM). For low-rise (Part 9) and small multi-unit residential buildings with less than four storeys, a registered residential EA, accredited by Natural Resources Canada, or equivalent, may undertake this analysis.”*

3. Compliance Form:

- A key element for the successful adoption of the new requirement within 9.36 is the communication and accountability for compliance.
- While the results of the modeling must be clearly communicated, the current process includes cumbersome forms. This unfortunately impacts the EAs’ ability to leverage our modeling reporting tools and can contribute to confusion and misunderstanding by AHJ. Unnecessary data entry, which is currently enforced through 9.36 submission forms, also can result in time delays and increased costs for builders.
- CACEA recommends that there be a more integrated form, designed to collect relevant information, speed up submission, and reduce costs. The form would be provided by Municipal Affairs as a recommended template with supporting documents on its use, review, and quality assurance. This tool will encourage adoption and consistent enforcement by AHJ across the Province. CACEA members would be pleased to share their expertise and experience, and work with the Provincial Government and AHJs to design templates for forms that are consistent and effective.

4. Communication and Education

- CACEA and its members are ideally suited to provide internal and external training to a variety of building sector stakeholders around modelling, testing and performance-based building codes by virtue of their training and “in-the-field” expertise. In fact, we frequently provide this type of training to a variety of audiences across Canada. We believe this would be of great value for AHJs and others who are engaged in this work – particularly as we transition to a new edition of the Building Code.
- The Association, through its membership and broad stakeholder engagement, can serve as a conduit to quickly disseminate information and updates to our larger community through newsletters, webinars, and working committees and councils.

In short, CACEA is in an ideal position to provide great value to the Province of Alberta and there are many opportunities for our ongoing collaboration and engagement – whether it is addressing the items highlighted in this letter, or exploring additional initiatives where we and our members can contribute our unique perspective, expertise, and guidance.

We look forward to discussing all, or any of these items.

Sincerely



Cindy Gareau  
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