

Project Overview

On July 5, 2022, Calgary's City Council approved the Calgary Climate Strategy: Pathways to 2050 (2022), giving direction to develop a process to require all new residential buildings to have a building energy label. The Home Energy Label Program was initiated prior to 2022 with the direction set in the earlier Climate Resilience Strategy (2018). The Home Energy Label Program will create an energy performance database of new and existing homes in Calgary.

By 2024, The City will require all new, low-density homes (single family, semi-detached, and duplexes) to obtain an EnerGuide Label upon completion of construction. To comply with this program, a registered Energy Advisor will need to conduct an airtightness test (blower door) and prepare a preliminary EnerGuide Label for submission to the City prior to occupancy of the new home. The verified EnerGuide Label must be submitted to the City for public disclosure.

To estimate the energy performance of existing homes, the City is exploring the use of digital energy scores; calculating annual energy consumption and greenhouse gas emissions using data and eliminating the need for on-site testing. This method of creating an energy score is less accurate than the EnerGuide Label, but it can be rapidly scaled to over 350,000 homes and provides comparable metrics to EnerGuide.

The Home Energy Label Program will help to meet several objectives of the City's climate programs, including:

- educate builders and homeowners on the energy consumption and GHG emission ratings of homes;
- enable comparisons between homes based on their energy and greenhouse gas emission scores, which can be used to prioritize energy efficiency when decision-making;
- verify the airtightness of new homes, provide builders with best-practice resources, and prepare industry for tiered performance codes; and
- create a baseline understanding of home energy performance that can be used to administer other building-related programs such as residential retrofit incentives.

Engagement for the Home Energy Label Program has been separated into two phases. Phase 1 engagement activities focused on program development for new homes and wrapped up in September of 2022. Phase 2 engagement continued through the fall of 2022 with four online workshops for interested parties and a survey component. This second phase of engagement focused on refinement of the new homes program, and development of the existing homes program.

Home Energy Label Program Engagement

Engagement Report Back: What We Heard
Phase 2: Fall 2022

This What We Heard report contains both summary and verbatim documentation of the input gathered through Phase 2 workshops and online survey.

Engagement Overview – Phase 1

The Phase 1 engagement process involved a Part 1 engagement early in 2022 and Part 2 report-back in fall 2022. Part 1 early engagement included workshops presenting the draft energy labelling framework for feedback and an online survey. Phase 1 engagement continued with a report back in the fall to the same industry and community groups. Feedback was requested through an online survey available from September 7 to September 23, 2022. The survey page shared a project update and three important documents for further comment:

- [Home Energy Label Program Overview](#)
- [Home Energy Label Program Homebuilders Info Guide](#)
- [Home Energy Label Program Homeowners Info Guide](#)

What We Heard reports were compiled to summarize feedback from both parts of Phase 1 engagement:

- [Phase 1 Workshops: What We Heard Report](#)
- [Phase 1, Part 2 What We Heard Report](#)

Engagement Overview – Phase 2

The Home Energy Labelling Program Phase 2 engagement continued engagement on new homes and formally began engagement on program design for existing homes. Engagement occurred through one round of interested party meetings and an online survey. The online survey mirrored the questions discussed in workshop meetings and was open from October 20 until November 10, 2022 for additional input from attendees or from interested parties unable to attend the meetings.

Phase 2 engagement focused on continued input for key areas of program design for the labelling of new homes and overall input on existing home labelling in the following categories:

- New Homes:
 - Bylaw development
 - Pilot program design
 - Data disclosure
- Existing Homes:
 - Program design
 - Timelines

For a summary of the feedback shared in the meetings and online survey, please see the [Summary of Feedback](#) section.

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For a verbatim listing of all the feedback received through the online survey, please see the [Verbatim Survey Responses](#) section.

Next Steps

Formal engagement activities for the Home Energy Label Program are now complete. Feedback collected in all phases is helping to inform program design of the Home Energy Label Program for both new and existing homes. The project team is now preparing to refine program process and draft the bylaw for mandatory labelling of new homes considering input from the engagement activities as well as other technical project inputs. Once the final design of the program is complete, a pilot period for new homes labelling and an education and outreach program will be launched.

Summary of Feedback

Many common themes emerged across all engagement activities. At the highest level, major themes from the feedback are provided here. A further breakdown of what was heard through each of the engagement activities is provided in subsequent sections.

Main Themes:

- Among the participants, there are varied opinions and levels of support for the labelling program, in general and as developed by The City. Some participants are very supportive and do not have many recommended changes. Some participants are not comfortable with The City mandating this data collection and the associated timeline, process and cost implications.
- There is a strong theme in the feedback that the current approach of requiring an energy label before final inspection is not reasonable and will result in occupancy delays. Alternative options have been offered for The City to consider.
- For those concerned about the energy labeling program in general, concerns include:
 - the cost of the program and its impact on housing affordability;
 - additional red tape;
 - government involvement in the housing market; and
 - the likelihood of “green shaming” existing homes resulting in their devaluation compared to new homes
- Perspectives were mixed about the capacity of the Energy Advisor and Service Organization industry to handle the demand. Some respondents are very concerned this will become a major issue. Others are comfortable that with advanced communications and a pilot period, the industry will be able to build up sufficient capacity.
- Throughout feedback, there is a strong theme that consistency between the programs (new and existing homes) is necessary and without it the data does not allow for direct comparisons.

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- Proactive education and outreach are seen as significant, and many ideas were shared about how best to reach industry and homeowners.

Workshops for Interested Parties

What We Asked

Four workshops for interested parties were held over the course of two weeks, on October 17, 18, 20 and 27. Interested parties representing a cross-section of those potentially impacted across the industry were invited to participate. A total of 41 participants took part in these meetings.

All meetings followed the same format, with focused presentations and discussion on both EnerGuide labelling for new construction and digital labelling options for existing homes. The project team first shared an overview of the project and program design for new homes. This was followed by a facilitated discussion with participants seeking feedback on potential impacts of the bylaw requirement, pilot program design, and education and outreach. The project team then delivered a presentation on potential options for digital labelling of existing homes. The session then focused on seeking feedback related to timelines for the roll out of program phases as well as any strengths or concerns participants wanted to share for the three digital label options presented.

What We Heard

Overall, participants were mixed in their support and concerns for the new homes labelling program. With key recommended changes to submission documentation and timing, participants were generally supportive of the implementation approach, and pilot period to prepare industry and build capacity. Participants raised concerns around builder timelines and industry capacity as well as privacy and data disclosure especially for existing homes.

A number of common themes emerged through the four workshops for interested parties. These themes are described below.

- Generally, there is support overall for the labelling program with concerns about implementation options, timelines, and process.
- Significant concern for builder timelines and label requirements delaying occupancy. Participants suggested alternative options for submission such as a draft label or as-built report.
- The timing and pilot program for new homes labelling is good and will help to ready industry for the coming step code.
- Clear expectations and digestible program materials are needed for Energy Advisors and Service Organizations to ensure industry readiness and program success.

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- It would be ideal for all homes to be labelled under one standard to avoid confusion and ensure clear comparisons. If one standard is not possible, language used and differentiation should be clear to all users to avoid confusion between different rating systems.
- It was noted that realtors should be considered a target group for the program's education campaign as they are a significant interested party.
- Participants shared concern over the program's impact on affordability and additional process or red tape for builders and homeowners.
- Some participants indicated concern about the program's objectives and questioned why the City would launch a program that affects real estate market decisions.
- There is significant concern over privacy and data disclosure for the mapping of energy usage especially for existing homes.
- There was concern that publicly available labels for existing homes may stigmatize and devalue older homes that show lower performance.

Below are summaries from each of the meetings, with participant input organized by theme. While not all comments are included in this report, the main themes or ideas shared more frequently have been reflected.

October 17, 2022 – Meeting with BILD and members

19 participants attended this meeting.

Builder timelines and industry capacity

- Several participants expressed concern about builder timelines and delaying occupancy.
- Participants suggested the City could require a letter of compliance from energy advisors or verification of blower door testing rather than final submission of the EnerGuide label as a check point.
- Current concern over industry capacity is a reason why some builders are not undertaking blower door testing and labelling as part of their process now.

Impact of the bylaw

- Participants indicated that most builders are already energy modelling but that there may be differences between modelling for code compliance and modelling for EnerGuide labelling.
- The greatest impact will be felt by builders who are not currently using a modelling approach and will have to add this step.
- Several participants were concerned about equating performance and prescriptive paths in the code where requirements for compliance differ and blower door testing is not required for all. As a result, participants indicated that for some, blower door testing is an additional step, but that requirements will change as the new step code is introduced.

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Alignment with new building code

- When the new code comes out, essentially all builders will move to blower door testing and labelling. Participants noted the proposed label program is a step toward the coming step code requirements.
- Several participants suggested that aligning the Home Energy Label Program with the introduction of the step code would be a more ideal timing for roll out.

Education and outreach

- One participant suggested including an education piece tied to the building permit process, so information is available through a link in the application.
- Participants encouraged education and outreach to realtors to promote understanding and the value of labelling to be shared with homeowners.
- Participants expressed support for the EnerGuide label as an appropriate tool and simple way for homeowners to measure and understand their home's efficiency.

Pre-pilot

- 2 participants indicated they would like to participate in a pre-pilot program.

Existing homes process

- Participants discussed potential for a label required at time of sale for existing homes.
- Could there be incentives for existing homes to get or update their label? Even where improvements have been done there is no incentive to update label information.

Digital label options

- A hybrid option that captures improvements to homes, not just energy information from time of build, would be preferred and third-party platforms may have this advantage.
- If the comparison is clearer between homes with up-to-date information, then the market can determine value.
- One participant indicated their preference for an in-house option over third party platforms.

Concern over consistency

- Several participants noted concern over comparing different standards. Participants expressed hope for all new and existing homes to be labelled to one standard.
- Concern was expressed over different labelling approaches in other municipalities potentially confusing builders who are active in multiple areas.
- Some participants expressed concern over not having mandatory labelling for existing homes if labelling is mandatory for new homes.

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October 18, 2022 - Meeting with Energy Advisors and Service Organizations

13 participants attended this meeting.

Support for the program

- This pilot program and incentives will help the industry prepare for the coming tiered energy code.
- If builders can take part in a program like this where incentives are available and they learn about energy efficient building in advance of tiered energy, this is great for the industry.

Desired clarity in program communications

- Participants recommended having an inventory or displayed list of Energy Advisors and Service Organizations to aid in homeowners accessing services with no specific endorsement for vendors.
- Several participants noted to be careful not to dictate price or set perceived value of Energy Advisor services with program incentives. Clear wording is needed around the role of Energy Advisors and that the incentive is intended to cover just a portion of the cost and service.
- Wording needs to be clear that an EnerGuide label is a statement of consumption not a performance target.

Impact of the bylaw

- A number of participants indicated that there would not be a large impact as most builders are already modelling through the performance path.
- About 80% of builders build to performance path and use Energy Advisors for compliance, but the blower door test and EnerGuide labelling will be an additional process and cost for most.

Timing/process

- Participants noted concern over unpredictable delays in NRCan's process and other variables and recommended a 30-day time frame for label delivery.
- Several participants suggested that to avoid delays to occupancy, the City could require a draft label or as-built report from the energy advisor which may be possible to turn around in a couple of days.
- It makes sense for builders if new and existing home energy labels roll out at the same time.
- There may be industry push back if one phase rolls out before the other, making comparison not possible.

Education and Outreach

- Homeowners drive the market and will assign value to efficiency if they understand what labels and energy ratings mean, so there is basic need for homeowner education around what an efficient home is, how to understand labels etc. One participant suggested working with home builders associations to develop this education.

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- The City could share case studies of builders who have gone through the program.
- One participant suggested reaching out and leveraging home renovation shows to highlight energy efficiency and the EnerGuide process.
- There is further opportunity to help people explore what they can do once they have a label to improve their home.

Clarity and consistency

- Participants cautioned against exclusively using virtual audits, noting that energy advisors play an important role in supporting informed homeowner decisions for energy improvements.
- A number of participants noted concern over multiple/competing label programs creating end user confusion. If the City is using an in-house digital labelling approach, wording is critical so as not to be confused with EnerGuide labels. One participant suggested it not be called a label to avoid confusion.

Impact on Industry and Capacity

- Several participants indicated there is plenty of industry capacity if there is appropriate notice and a pilot period.
- The 12-month pilot period is a good timeframe to ready industry.
- Many participants supported a recommendation for Energy Advisors and Service Organizations to sign a non-disclosure agreement for requirements of the pilot with plenty of time for those participating to test out the program's tools and measures and develop a clear understanding. It was also suggested for the program to develop out FAQs and other guiding information.
- Consider that builders also need to integrate the program requirements in their process as well. Energy Advisors may be ready, but builders need to hit their mark on final occupancy.

Other comments

- Be aware that there is a movement towards a renovation building code at the national level.
- A next step would be considering carbon reduction, having embodied and operational carbon added in the building code.

October 20, 2022 – Meeting with Institutional and Interested Groups

5 participants attended this meeting.

Timelines/process

- Energy Advisors can do a blower door submission to NRCan and generation of the label within 24-48 hours, depending on the availability of the house. Can the process be changed to accept proposed EnerGuide reports rather than final report?
- Is there an opportunity for mandatory labelling at time of sale?

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- Several participants indicated that while the existing homes digital labelling program may take more time to develop, the new homes phase of the program should not wait to go forward. The roll out of new homes program will help to ready the industry for the coming step code.

Supporting homeowner next steps

- Several participants mentioned the importance of helping homeowners use the label information to improve their homes and providing connection to grant programs and resources that can help with those next steps to improve.
- Incentives for higher performing homes may help push people to improve.
- Participants suggested an incentive for homeowners who know their home is performing better than the digital label to get the EnerGuide label to verify.

Education and Outreach

- There was a suggestion for a spotlight on builders with effective labelling and suggestion to show a range of homes highlighting some that show some energy uncertainty, homes that are making good progress, and homes that are doing things well.
- Participants encouraged not just highlighting the best performing homes but exploring ways to show homeowners how their home compares, similar to a home energy report.
- Participants indicated the importance of education for realtors as the contact point between builder and owner.
- Education about available incentives and rebates such as CMHC rebates for labelling energy efficient houses should be shared.

Digital Label Options

- Several participants indicated support for a third-party platform approach for the most holistic result and effective way to reach emissions reductions goals.
- With the use of a third-party platform, participants expressed concerns for privacy and for homeowners inputting unverified data.

Other comments

- When consistent data is available, it will drive the market and homes showing better performance will get more value on resale.
- The new homes program is well thought out.

October 27, 2022 – Meeting with CREB

4 participants attended this meeting.

Data disclosure and privacy concerns

- There was consensus among participants that privacy of information and data disclosure is a significant concern.

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- One participant indicated that disclosing building energy use on a public map will lead to “green shaming” and potentially divide communities especially where infills are built in older neighbourhoods.
- Participants expressed concern that by disclosing building-level energy consumption, the program may stigmatize older homes in comparison to homes that show greater energy efficiency and marginalize people in the market who don’t have the means to perform energy upgrades to their homes.

Program rationale and the role of government

- There was notable concern around the role of the municipal government in running the program and questions of why The City is stepping into the market.
- A number of participants expressed that homeowners are not asking for energy use information and questioned why the labelling program is necessary.
- If the City has baseline data to populate a map with digital labels from the time of build, why do they need more information?
- Up until now, the City had data on the outside of homes or parts of the home that have gone through municipal permitting process. The Home Energy Label Program gives the City more intimate information on our use of private space which may trigger pushback.

Financial concerns

- Financial concerns were expressed including affordability and if the program will impact housing cost as well as concern that homeowners will incur costs to “keep up” with better performing houses in a market driven by energy use.
- There was also concern over the budget cost of the program to the City.
- Participants questioned whether there would be an impact on tax assessment as improvements are published in the program database.
- Several participants showed concern over adding bureaucratic process in a time when housing is needed, and red tape reduction initiatives are seeing results. The program adds another step to getting much needed homes built.

Other comments

- One participant questioned the impact engagement feedback might have on project outcomes and if the program is moving forward regardless.

Online Survey

What We Asked

The online survey was available from October 20 to November 10, 2022 and was open to interested parties who weren’t able to attend one of the industry workshops or to anyone who felt they had more to share with the project team. A total of nine responses were provided.

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The survey included seven questions on EnerGuide labels for new homes and three questions on digital labels for existing homes. Participants were asked to share their thoughts on the bylaw requirement for new homes, impact on industry, potential pilot program and incentives, suggestions for education and outreach, timelines, and feedback on the three digital label options presented for existing homes. Participants were also asked to share any additional feedback they would like the project team to consider.

In addition, the survey included a section on engagement assessment, asking participants to share their feedback on the engagement process to help inform the City of Calgary's future engagement practice.

Participants were provided with an overview of background information and a recording of The City's presentation from the first workshop meeting to help inform their responses.

What We Heard

Among the nine respondents there were varied perspectives provided on many of the questions. Common themes have been identified and example quotes included to provide additional insight into the feedback.

Phase 1 Feedback Themes:

Timing / process

- Concern that the New Homes labelling process will require additional timelines and processes for builders, and will likely delay occupancy:
 - "We would have to complete the next step of compliance testing. This is best done close to possession and before Owner Occupation. The final paper work and the labels for the Mechanical Room come when they get in. Currently a blower door retest takes approximately 21 days to book."
 - "Providing the EnerGuide label at Booking of final inspection will cause scheduling issues and delay occupancy. Turn around varies by service Organization"
 - "More delays, since the city cannot keep up with permitting etc. now."

Financial concerns

- Concern that the New Home Labelling program will increase costs:
 - "Additional workload and costs which will eventually get passed onto the home owners. This will continue to erode housing affordability."
 - "Our concern is the additional cost of blower tests as well as timing of forced blower door test with an industry that is not prepared for the large future demand that will be placed on them."

Program rationale

- Concern about the value of the program:

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- “while a nice to have for consumers, we question the value when current energy codes for new houses already set standards appropriate to Calgary's climate strategy.”
- “The entire premise of the climate emergency is fallacious and is being done for political reasons. This is unconscionable and will result in more working class Canadians being unable to afford homes.”

Impact of the bylaw:

- Clear feedback that a delay in occupancy is not acceptable so an alternative method such as a conditional or interim submission needs to be considered:
 - “The label submission must not impede occupancy for new homes, so there needs to be a conditional pass on the final inspection (with some sort of proof from the builder on blower testing).”
 - “Although, we support new home energy labelling, the labels are not received until the home is complete. The Bylaw should address this as it will be difficult to move labelling back since the blower door test is not done until the home is complete.”
 - “Our CEA's could possibly provide average data before labelling and then verify once complete. (like the current 9.36 Summary where we estimate Energy use and an ACH of 2.5 or less and then our Energuide label out-performs, ie. we actually average 90 GJ/yr right now and ACH is < 1.5)”
- Several respondents commented that the program will not have an impact on how homes are modelled particularly for homebuilders using the performance path and because the program isn't impacting the building code. However, several other comments were received that the program would force homebuilders who typically use the prescriptive path to now use the performance path which changes the modelling requirements:
 - “It may for some of the smaller builders that are not already engaging in energy efficient practices but most production builders are already meeting the shifts in energy codes.”
 - “Unlikely, since the building code is what dictates the requirements for energy efficiency. This will just add another step and cost in the process so that the city can wave their climate change banner.”
 - “Yes, given we are a prescriptive builder and we will be forced to change to performance.”

Alignment with new building code:

- Concern that because the new building code will be released in the next few years, the labelling could be inconsistent and/or will be out of sync with the upcoming requirements:
 - “Codes will soon align with Energuide requirements and any bylaw requirement for labelling should be deferred until that time.”
 - “I also feel that the labelling should mirror the code and not be Calgary's "own" label with different requirements. By mimicking code, there will be no issues for builders that build in multiple cities.”

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Impact on industry and capacity:

- Three respondents were concerned that the requirement for blower door testing will result in more demand than the Energy Advisor and Service Organizations can meet:
 - “Our concern is the additional cost of blower tests as well as timing of forced blower door test with an industry that is not prepared for the large future demand that will be placed on them.”
 - “...there is a limited group of builders that energy model now and many builders still use the Prescriptive Path. Once modelling is required, there will be a high demand for CEA's which could delay builders in the pre-permit process. As well builders will need time to adjust internal processes and educate their teams. I also believe that when a date for the new Permit process is established there will be a wave of permits submitted under the current rules similar to what happened in 2016 when the 9.36 Energy code came into force.”
- Two respondents were not concerned with industry capacity:
 - “as an energy advisor who currently completes 9.36 code compliance with the EnerGuide pathway, including final testing and labeling, the impact, once everyone is on board, is fairly minimal”
 - “A strong and consistent support of the EnerGuide system will encourage Service Organization and Energy Advisors to grow to meet demands.”

Non-monetary incentives:

- Several respondents indicated that labelling will provide enough incentive on its own and non-monetary incentives aren't necessary:
 - “Labeling is a strong marketing potential for builder, especially in comparison to existing homes. Market transformation will be through competition more than anything and using the platform to highlight and promote high performance homes will become a motivation.”
- One respondent recommended deducting the testing cost from the first year's property tax payment and then The City would own the data.

Willingness to participate in a pre-pilot test:

- 2 respondents – contact information has been provided to The City.

Education and outreach:

- Respondents identified working with BILD Calgary and the building community directly through seminars, breakfasts and newsletters. One respondent suggested providing virtual training to all builders who have submitted a permit in the last 2 years.
- Feedback on education/outreach for homeowners included more traditional methods including advertisements and communication channels, information provided at trade shows and festivals including providing broad information about EnerGuide.
- Respondents also recommended working with CREB to provide agent training seminars and other outreach opportunities.

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- One respondent recommended working with CACEA to work directly with energy advisors.

Other Comments:

- Additional comments were provided that aren't represented in the main themes, but support feedback heard through other engagement activities during this project:
 - Builders who already use EnerGuide labelling should not be required to provide a security.
 - Support for The City helping builders connect to reliable Energy Advisors.
 - Feedback that existing homes needs to be considered in this program. Questions raised about how existing homes will be assessed to provide an equalized assessment between new and existing homes.
 - Concern that this program will erode housing affordability.
 - Questions about how renovated homes will be considered in this program and how it will impact them in terms of modelling, etc.

Phase 2 Feedback Themes:

Consistency and implementation phasing:

- Several respondents are concerned with having a different labelling program for existing homes from the proposed approach for new homes, and one indicated consistency with the province and Canada's energy guides is key:
 - "the energy labelling should be ONE program not multiple so that Consumer evaluation of Home labelling is comparable."
 - "mandatory labels for new homes without labeling for existing homes creates extra work for the new homes market that the existing homes market may not be subject to, tipping the scale on the comparison between the two"
 - "This would put an unfair onus and burden on new homes vs. the resale / renovation market."
- Other respondents indicated no concern with the roll-out phasing, or that starting with new homes would be best to prepare the industry.

Impact on existing homes

- Several commenters indicated their concern that existing homes would be devalued through lower ratings:
 - "while it would be good to have energy labelling for all homes in the future (when codes align to this requirement for new homes) existing homeowners who have low performing houses will not want to participate as a low energy performance label may have the potential to lower home resale values. this will be a big hurdle in getting existing homeowners to participate."

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Digital labels

- Responses included some feedback for digital labels generally indicating that they are a quick and easy solution for approximate understanding of energy, with another commenter indicating that they are not accurate and so make comparisons difficult and confusing.

Feedback for Option 1: New Construction + CEIP + Voluntary Submissions

- EnerGuide has brand recognition
- National data is accurate
- Enables comparability with the new homes program
- Connected to grant programs
- Concern that the province has a say in the program
- Concern with industry capacity for EnerGuide

Feedback for Option 2: City of Calgary Digital Label

- Provides widespread data across the city
- Faster implementation
- Enables city to control implementation speed and data access
- Concern that it's not consistent with the province, country or other cities
- Would likely need financial incentives to be successful
- It would be a City of Calgary specific tool would likely be abandoned over time or misused

Feedback for Option 3: Vendor Products – Energy Labels, Reports and Services

- Enables homeowners to provide updated and detailed information on their home
- Homeowners are provided with information to understand what benefits they could see by making changes to the home
- Data accuracy is better than Option 2
- Access to new technology and innovation possible
- Less cost to taxpayer
- Concern that it isn't standardized

Other Comments:

- Phase 2 feedback had fewer themes and more specific comments from each respondent. As such examples of the range of comments are provided here.
 - Questions about the impact on older homes sales that don't have energy labels, impact on resale value
 - Questions about how renovations will be addressed
 - Concern that the digital label options rely on consumers' buying-in to the program, which the participant thought would not happen
 - Recommendation that a digital label explain what impacted the house's rating. Need to understand why one house would perform better than a neighbour for example so that the labels aren't used to unfairly market homes

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- Suggestion to focus on the goal of the labelling program. If it is to label every home, then focus on creating a credible evaluation database. If it is to educate homeowners, then more information than provided in a label will be required. That will need Homeowner Information Sheets and Renovation Upgrade reports

Engagement Assessment Feedback

Of the 9 total online respondents, 8 provided feedback on the engagement process.

Question 1: Did you understand the Home Energy Label Program information provided?

Yes	7
Mostly	0
Not really	1
No	0

Question 2: Do you feel enough project information was provided for you to participate in a meaningful way?

Yes	3
Mostly	5
Not really	0
No	0

Do you feel the engagement activities you participated in were valuable to you?

Yes	4
Mostly	2
Not really	1
No	1

Is there anything else you would like the project team to know about the engagement process?

- “We trust it will be evaluated better for implementation and true engagement and not just as a stakeholder presentation of the City's direction. we heard some significant concerns in the presentation that merit consideration / revision by the City.”
- “I feel that this program is beneficial, no doubt, however strongly advise that the labelling parameters mimic the code for continuity and transferability across municipalities.”

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- “I tried to download 'Calgary Climate Strategy - Pathways to 2050' document for insight as to how this fits into the overall Climate Strategy for Calgary, but the document doesn't download. I would love to see how this program fits into the climate strategy!”
- “Nothing provided in these feedback sessions will influence what the politically motivated decision makers will do.”

Verbatim Survey Responses

The following pages are the verbatim survey responses received through the online survey. Responses are shown as they were submitted; no edits have been made to spelling or grammar. All questions were optional so the number of responses for each question may vary. Identifying information has been removed and replaced with XXXX.

Phase 1: Mandatory Labels for New Homes

Question 1: What impact will the bylaw requirement and timing of label submission have on builders and energy advisors?
Significant, in cost , in time and limited value. while a nice to have for consumers, we question the value when current energy codes for new houses already set standards appropriate to Calgary's climate strategy.
We would have to complete the next step of compliance testing. This is best done close to possession and before Owner Occupation. The final paper work and the labels for the Mechanical Room come when they get in.
Our concern is the additional cost of blower tests as well as timing of forced blower door test with an industry that is not prepared for the large future demand that will be placed on them. Currently a blower door retest takes approximately 21 days to book.
as an energy advisor who currently completes 9.36 code compliance with the EnerGuide pathway, including final testing and labeling, the impact, once everyone is on board, is fairly minimal
- Providing the EnerGuide label at Booking of final inspection will cause scheduling issues and delay occupancy. Turn around varies by service Organization. A security deposit is a important option and will likely be very common. Deposit process must not cause its own delay or hindrance. A strong and consistent support of the EnerGuide system will encourage Service Organization and Energy Advisors to grow to meet demands.
The label submission must not impede occupancy for new homes, so there needs to be a conditional pass on the final inspection (with some sort of proof from the builder on blower testing). Energy advisors will be overwhelmed, the the above needs to be considered.
As a builder we have been 9.36 Performance Path (energy modelling, blower door testing, Energuide label) for many years. Although, we support new home energy labelling, the labels are not received until the home is complete. The Bylaw should address this as it will be difficult to move labelling back since the blower door test is not done until the home is complete.
I believe it will create delays in transitioning new homeowners into their properties
Additional workload and costs which will eventually get passed onto the home owners. This will continue to erode housing affordability.

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Question 2: In your opinion, will the bylaw affect how buildings are modelled from the start of a project?

NO, the requirements are set out in current building codes. a bylaw cannot rewrite code and making it mandatory simply adds an additional layer of cost and inconvenience to the process. Codes will soon align with Energuide requirements and any bylaw requirement for labelling should be deferred until that time.

Yes it will Effect Renovations as we will be able to see who is not being honest and using 'marketing terms'. but renovations are a broad category and you need to start with houses that are being stripped to the studs. Asbestos testing results will tell you that information.

It will have no affect on this already modelling to a performance approach. Those who are applying through the perscpritive method will be forced to take on the performance approach. This will obviously cause delays in both permit application as well as occupancy.

not if completed correctly

- Most permit submissions are made with the Performance Path, but without using EnerGuide. This allows unqualified, unregistered modelers to complete the calculations with little oversight and little liability. Using EnerGuide will promote the use of the EnerGuide Standata (14-BCV-017) for compliance and will encourage better more dependable modeling with required Quality Assurance by Service Organization and by Natural Resources Canada.

- This change aligns with implementation of NBC 2020 where EnerGuide has been included directly in the Building Code.

- The change from unqualified modeling for compliance EnerGuide based modeling is underway and this policy aligns and supports.

Yes, given we are a prescriptive builder and we will be forced to change to performance.

Yes- there is a limited group of builders that energy model now and many builders still use the Prescriptive Path. Once modelling is required, there will be a high demand for CEA's which could delay builders in the pre-permit process. As well builders will need time to adjust internal processes and educate their teams. I also believe that when a date for the new Permit process is established there will be a wave of permits submitted under the current rules similar to what happened in 2016 when the 9.36 Energy code came into force.

It may for some of the smaller builders that are not already engaging in energy efficient practices but most production builders are already meeting the shifts in energy codes.

Unlikely, since the building code is what dictates the requirements for energy efficiency. This will just add another step and cost in the process so that the city can wave their climate change banner.

Question 3: The City is looking at having bylaw compliance occur at the inspection booking. What potential challenges or opportunities do you see from this approach?

see above

This will likely have to be a condition requiring verification (VOC) . Renovations do not require an occupancy inspection prior to the client moving back in.

This will delay occupancy in an industry that is already struggling will extended build times and supply shortages.

educating builders on when the home needs to be tested (in this case prior to booking inspections). As a current EA doing this work, once everyone knows when to book things, it goes fairly smoothly

- Allowing EA to directly upload on behalf of the builder or owner will improve turn around if City of Calgary is a NRCAN partner. Version 15 of EnerGuide Rating System Administrative Guide clarifies under 7.2.1 2) that the information contained within the EnerGuide label and Homeowner Information Sheet is

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non-personal and not covered under the Privacy Act or Personal Information and Electronic Documents Act.
Timing of the blower testing in the schedule and receiving the results prior to inspection booking will be a challenge. I also feel that the labelling should mirror the code and not be Calgary's "own" label with different requirements. By mimicking code, there will be no issues for builders that build in multiple cities.
If Bylaw conformance is at Final Inspection, it may work if we could get Energuide labels sooner or have a CEA sign off that the label will be produced and submitted as soon as completed. In our case we have years of performance data on energy use, blower door test results (ACH) and average Energuide scores for the homes we build. Our CEA's could possibly provide average data before labelling and then verify once complete. (like the current 9.36 Summary where we estimate Energy use and an ACH of 2.5 or less and then our Energuide label out-performs, ie. we actually average 90 GJ/yr right now and ACH is < 1.5) Builders that already use Energuide labelling should not have to provide a security in my opinion.
Further delays to providing occupancy to homeowners.
More delays, since the city cannot keep up with permitting etc. now.

Question 4: In your opinion, are there potential non-monetary incentives that could be offered for energy labelling?

none. we see no value in this exercise until such time as Energuide and Code requirements align. at present the code allows for two paths for code compliance, energuide or 9.36. making this mandatory effectively eliminates one path or makes builders do it twice to show an energuide rating.
Deduct the testing cost from the first years property tax payments. ... Then you own the data.
None that come to mind
shouldn't be necessary. in getting a label, homes are now third-party reviewed for energy efficiency, which should have enough benefit to the builder. if they use the ERS modeling/pathway for code compliance, they will benefit by having an easier code compliance
Labeling is a strong marketing potential for builder, especially in comparison to existing homes. Market transformation will be through competition more than anything and using the platform to highlight and promote high performance homes will become a motivation.
Not if it is mandatory for everyone.
The city could help builders that are new to energy modelling find reliable CEA's and should hold a series of presentations to builders explaining the process.
Unsure, but they would be mainly virtue signaling and political in nature.

Question 5: Are you a builder willing to participate in a 'pre-pilot' to test administrative process? If so, please consider providing us with your contact information below.

NA
Yes. XXXX
Not at the moment.
not a builder, but an Energy Advisor who has been using the EnerGuide pathway for code compliance since the Standata was introduced in Jan 2018
N/A but we do have builders that will be interested.
Possibly
Yes, XXXX

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UILT,

No, we believe the entire premise of the city's stance on climate change and the so called "climate emergency" is faulty.

Note: Responses to Question 5 include personal and identifying information that is replaced here with XXXX. Contact information has been provided to the project team.

Question 6: Success of this energy labelling program will require effective education and outreach. Do you have any suggestions for how best to reach builders, energy advisors, and homeowners?

Providing a market standard method of home evaluation for energy performance is good. but timing and implementation needs further consideration.

Builders - Bild semiars , builder breakfasts; Homeowners - Advertisement, trade shows, festivals
CREB - Agent Training Semiars; Exterior trades need to be adopting this knowledge and passing on
Government grant info

I believe the question at hand is what is the advantage to homeowners and how will existing homes fall into the program in a fair way to equalize the comparison of new to old homes

public engagement from city of calgary on what an EnerGuide label is will go a long way explaining to homeowners what it is and why it matters. builders and EAs already know all of this (at least the good ones)

CACEA is a national association of Energy Advisors and can reach EA's directly, CACEA.CA. Builder Breakfast sessions and newsletter articles through the associations are the fastest.

BILD is likely the best option for the builder group, although not everyone is a member. The city should provide info and training sessions (virtually) to all of the builders that have submitted a permit in the last 12-24 months. Energy Advisors should be contacted similarly so everyone is on the same page. Homeowners would require media adverts to capture existing homeowners that are looking to complete the labelling.

For builders and energy advisors, I suggest starting presentations to the industry as soon as possible to prepare everyone. This can be done in conjunction with BILD Calgary at conference facilities. For homeowners, I suggest reaching out through any current City correspondence as well as public messaging, commercials, radio, etc. The average Calgary homeowner or new home buyer is not aware of what an Energuide label is and that it will be required soon.

Again, this is clearly political in nature, so there is little input we can offer.

Question 7: Is there anything else you would like to share with the project team?

We need to discuss renovations and how to bring them up to speed.

many builders are already running through this program, though not specific to it

I don't feel the program should be rushed. It needs to mimic the code and not have it's own set of metrics, this will allow continuity amongst municipalities and lessen confusion for industry and homeowners.

I think this should not be a mandatory program. Builders are already moving toward energy code changes and those that want to use the label will use it to differentiate themselves to consumers. The focus should be on the used housing market as that is where there lacks energy efficiency

The entire premise of the climate emergency is fallacious, and is being done for political reasons. This is unconscionable, and will result in more working class Canadians being unable to afford homes.

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Phase 2: Digital Labels for Existing Homes

Question 1: The program has two phases:

- energy labels for new homes; and
- digital energy labels for existing homes

If one phase rolls out before the other, are there any concerns or potential impacts to consider?

the energy labelling should be ONE program not multiple so that Consumer evaluation of Home labelling is comparable.

How will it impact sales for older homes without energy labels, what impact will scores have on home sales - pricing and days on market. Will Home energy labels be a requirement for renovation permits, or what would trigger a requirement for a energy audit.

mandatory labels for new homes without labeling for existing homes creates extra work for the new homes market that the existing homes market may not be subject to, tipping the scale on the comparison between the two

No concerns

Rolling out new home labels first is a better way to go as it will help spread the word and prepare Energy Advisors and the City for the existing home program

Important to consider for 'digital energy labels for existing homes': a system to allow EA's to easily update labels for homes they have previously done energy evaluations for. New information often comes to light weeks or months

This would put an unfair onus and burden on new homes vs. the resale / renovation market.

Question 2a: The City is exploring potential options for labelling existing homes including:

- Clean Energy Improvement Program and Voluntary Submission (EnerGuide Labels)
- City of Calgary Digital Energy Label
- Vendor-provided digital energy label solution

In your opinion, what are the strengths of each option?

there should be only one labelling standard.

ceip - already in place would be consistent with the province?

City of Calg - city can control the label and requirements

Vendor - less cost to the tax payer

EnerGuide is a national, decades old program that has some recognition in name/brand for homeowners and is fairly well known to builders and renovators.

Digital labels can provide a quick solution for approximate energy use

A digital label that allows homeowner to "play with the dials" of the modeling is hugely beneficial. This work is time consuming for Energy Advisors to do, but is important to allow homeowner to get a feel for what can be changed and what the effects could be.

Allowing a simpler label initial comparison allowing homeowner to "kick the tires" before committing to a full EnerGuide or a renovation plan is important.

The strengths of Option 1 are the accuracy of the data, the ability to compare to new homes, and the use of federal incentives such as the Greener Homes Program.

Strengths of Option 2 include a widespread and faster implementation with less homeowner contact as it

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is based on estimated data.

Strengths of Option 3 include accuracy of data and access to new technology and innovation.

I don't understand how these are different. I assume that the same labels that are generated for CEIP programs would also be uploaded to City of Calgary Digital Energy Label. Also, if an EnerGuide label is the desired output, there is no 'Vendor-provided digital energy label solution' other than the energy modelling software provided by NRCan. That software is the only one that interacts the EnerGuide report generating software (to the best of my knowledge).

These all rely on the consumer's buy in to the program and it's premise, which many will not.

Question 2b: In your opinion, what are concerns with each option?

see above

ceip - province has say in program

City - not consistent with province/country

vendor - different vendors with different calcs/programs

Largest concern with EnerGuide is industry capacity and ensuring that the EA market does not become overloaded, which could lead to poor/bad actors

Digital label inaccuracy is a concern. We have seen multiple programs over the years that have attempted this, and the company I work for has been called out to complete EnerGuide labeling on homes as a comparative tool, and we have found that the programs we have reviewed are not typically very accurate

Digital energy labels that do not use the EnerGuide calculation and do not relate to actual energy consumption (use scales) make understanding hard and confuse with homes that are labeled. Digital labels must relate back to GJ of energy per year to provide a comparison and accuracy assessment. A digital label with a margin of error that ensure a actual EnerGuide always falls between will be the most helpful and clear. Digital label have inherent risks in public feels they are inaccurate or providing misleading information or is being used as a marketing tool for equipment or changes. Careful balance must be made.

Option 1: Will take time implement as it is voluntary and incentives for homeowners are limited to the Greener Homes Grant or low interest loans. There is a waiting list for these programs, they require access into the home by CEA's and this all takes time.

Option 2: Accuracy of the data is based on time of construction and some homeowners may have made mechanical and building envelope improvements since. If a range of energy use is established, what will the outcome be for homeowners- will they be penalized for high energy use? If there are no grants or monetary incentives, many homeowners will not be motivated to improve.

Option 3: Locking into a vendor for long term is concerning. Costs are a concern as well as data privacy.

How long are the labels going to be valid for?

These all rely on the consumer's buy in to the program and it's premise, which many will not.

Question 3: Is there anything else you would like to share with the project team?

while it would be good to have energy labelling for all homes in the future (when codes align to this requirement for new homes) existing homeowners who have low performing houses will not want to participate as a low energy performance label may have the potential to lower home resale values. this will be a big hurdle in getting existing homeowners to participate.

program needs to be consistent with province and Canadas energy guides. factor in impact of existing older homes - resale values , costs to comply, any minimum requirements and how to deal with on a

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existing home. How new homes with energy labels will affect older neighborhoods without. how renovation building permits will be reviewed and if they trigger a requirement to get a home energy label.
would suggest not developing a "city of calgary" specific tool. Assumption is that it would be abandoned before it ever becomes useful or it would be over utilized by bad actors
It is critical that a digital label explain why one house performs differently than its neighbour to be useful. While adding details about the home to improve the modeling accuracy is important it should be used carefully to ensure homes are not unfairly credited to improve rental or sales.
Option 2 is the most feasible in my opinion but with the ability to allow homeowners to upload energy improvements and Energuide labels. The program will likely need financial incentives as opposed to penalties to be successful.
Important to consider; what is the goal of this labelling program? Start with the end goal in mind. If the goal is to accurately label every home in the City, then Calgary should hire some reputable SO's and start evaluating every home in the City. If the goal is to inform prospective homeowners of how energy efficient the home is, and what can be done to improve it, then providing Homeowner Information Sheets and Renovation Upgrade Reports on top of EnerGuide labels is important. EnerGuide labels on their own do not communicate the components of the home. Again, start with the end goal in mind! Also; please give decision making power to the administrators of this program. Hang-ups will happen, and time is usually of the essence.
This is just more politically motivated virtue signaling, which is being used to justify more public service positions and pay cheques.

Engagement Assessment

Built into the Engage portal survey were additional questions intended to gain feedback on the engagement process. Feedback gathered in this section will help to inform future process for The City.

Question 1: Did you understand the Home Energy Label Program information provided?	
Yes	7
Mostly	0
Not really	1
No	0

Question 2: Do you feel enough project information was provided for you to participate in a meaningful way?	
Yes	3
Mostly	5
Not really	0
No	0

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Question 3: Do you feel the engagement activities you participated in were valuable to you?

Yes	4
Mostly	2
Not really	1
No	1

Question 4: Is there anything else you would like the project team to know about the engagement process?

We trust it will be evaluated better for implementation and true engagement and not just as a stakeholder presentation of the City's direction. we heard some significant concerns in the presentation that merit consideration / revision by the City.

I feel that this program is beneficial, no doubt, however strongly advise that the labelling parameters mimic the code for continuity and transferability across municipalities.

I tried to download 'Calgary Climate Strategy - Pathways to 2050' document for insight as to how this fits into the overall Climate Strategy for Calgary, but the document doesn't download. I would love to see how this program fits into the climate strategy!

Nothing provided in these feedback sessions will influence what the politically motivated decision makers will do.