

Submission to Ontario's Climate Change Consultations

By

THE CANADIAN ENERGY EFFICIENCY ALLIANCE (CEEA)

About Us

The Canadian Energy Efficiency Alliance (CEEA) is pleased to have this opportunity to submit its comments to the Ministry of the Environment and Climate Change as part of its broad consultations related to Ontario's plans to move forward on climate change.

CEEA is Canada's leading independent advocate promoting the economic and environmental benefits of energy efficiency. Established in 1995, CEEA works with both federal and provincial governments as well as other stakeholders to ensure energy efficiency is a priority for all sectors of the economy. By monitoring, examining and developing public policy ideas, programs and codes and standards, CEEA is an effective resource for policy makers, consumers, and energy companies. CEEA's membership includes all economic sectors related to energy efficiency, including manufacturers, utilities, governments, building, labour and consumer groups and environmental organizations.

Introduction

CEEA commends the Ontario government and the Ministry of the Environment and Climate Change for taking the initiative to recognize the importance of developing policy and programs that will support an activist climate change agenda for the province. Indeed, by being the first jurisdiction to wean itself off of coal, Ontario is already a recognized leader in this field.

CEEA appreciates the questions that had been presented in the discussion paper provided by the Ministry and CEEA was pleased to participate in the public consultation held in Ottawa. CEEA intends to respond to the questions in cases where it can provide the best value based on the experience of our members.

This document will lay out CEEA's recommendations with regard to this undertaking. In summary, they are:

- Success in terms of climate change will require a revolution or social change. This means all Ontarians are involved. The Province must ensure that province-wide, consistent and unified information in multiple formats is developed and disseminated. These messages will need to be reinforced to stress that beyond adding the right products, they must be managed effectively; otherwise, their value is dismissed.



- In terms of a carbon market, we leave it to the province to identify the best model. However, whatever model that is put in place must ensure that capital stays in Ontario and does not flow to other jurisdictions. This funding should be used to incent projects that will enhance a low carbon economy and encourage innovation and bringing these solutions to market. .
- Set targets in order to educate, spark change and get concrete results through programs like a province wide building benchmarking system
- Ontario should adopt a procurement model that evaluates qualified proponents based on the net present value (NPV) of the energy conservation projects they propose in detailed submissions. This has already been adopted successfully in the province of Quebec. It aligns interests and produces incentives for deeper energy retrofits.
- Promote a culture of conservation by enacting Section 3 of the *Green Energy and Green Economy Act, 2009* to enable mandatory home energy audits prior to the sale of an existing home (re-sale);
- Provide incentives imbedded in the tax system that would support energy efficient renovations and that would repatriate revenues from the “underground economy” to the province; and
- Given that many Ontario communities are currently engaged in developing climate change plans (Hamilton, Burlington, London, Markham, Vaughan, Toronto and many others). Any initiatives contemplated by the Ministry should take into consideration, and support, municipal and community level climate change policies and plans that are currently in place or are under development
- In order that the energy efficiency and climate change goals of Ontario’s Building Code are met, ensure that training programs for municipal officials are developed and supported by the Government of Ontario.
- Ontario should adopt a broader clean transportation policy that supports a range of low carbon vehicles, including, electric, hybrid (primarily light duty applications) and natural gas (primarily medium/heavy duty vehicles).
- Ontario should support the establishment of a renewable natural gas market (produced from landfills or organic waste from sewage, agriculture and forestry or methanized hydrogen), which would result in creating local supply, employment opportunities and lower GHG emissions through the reduced use of traditionally sourced natural gas in the province.

CEEA generally supports the recommendations made by the Ontario Home Builders Association (OHBA) in their submission. We would note the following three points in particular:

- Ensure municipal planning implementation policies (including Official Plans and Zoning by-Laws) are modernized and in conformity with the PPS and Provincial Plans;
- A province-wide transit strategy that dedicates funding to support low-carbon municipal transit expansion. The province should continue to coordinate with stakeholders and advocate for a National Transit Strategy;
- The Minister of Transportation commence consultations with stakeholders to implement Section 31.1 of the *Metrolinx Act, 2006* for the Minister to issue a Transportation Planning Policy Statement (TPPS) that would apply to higher-order transit corridors across Ontario.

Climate change and the average Ontarian

The issue or discussion of climate change is pervasive in our society – but at the same time it is quite misunderstood. Many citizens are confused about “climate change” versus “global warming” and most are more focussed on whether “climate change” might account for a tough and snow filled 2015 winter, which is somewhat different from reducing the overall warming of our planet.

Ontarians believe, rightfully, that the province is already a leader because it has eliminated coal from energy generation and has adopted the Conservation First policy to lead the province both in terms of promoting the more efficient use of energy and to identify savings for Ontarians. Therefore, the next steps may be more challenging. This is especially true if citizens perceive that pricing carbon or establishing a carbon market might be linked to an increased cost for heating fuels, transportation, etc. Indeed many experts suggest that the time is ripe to introduce a carbon market because fuels costs are relatively low and so any additional costs may not be as noticeable.

CEEA’s 2013 survey of consumers on energy efficiency/conservation conducted by the Gandalf Group indicated that for an energy or environmental program to be successful, three things must be in place:

1. Perceived cost savings,
2. Environmental motivation, and
3. Knowledge of how to conserve.

This was reaffirmed in our 2014 survey of Canadian businesses – and in both surveys this was particularly true in Ontario. Therefore, the introduction of any program(s) focussed on climate change must take into consideration the oversensitivity of Ontario consumers to higher prices. A concerted effort that allows collaboration with willing natural gas utilities and electricity distribution utilities along

with the IESO to expand Demand Side Management (DSM) Programs to include emission reductions targets is required. We need to offer solutions to Ontarians to counter any increased costs e.g. a higher efficiency furnace, better insulation, or changing existing windows for ENERGY STAR windows that can **reduce** your home energy **costs** by 7 to 12 percent and reduce your carbon foot print.

While gas utilities in particular have developed in the past and will soon launch new DSM programs that offer incentives and rebates to consumers, our 2013 survey of consumers indicates only 26% of Ontarians participated in an energy rebate or conservation program offered by either the government or utilities. In 2014, we surveyed Canadian businesses, and – as in 2013 – we found that the majority of businesses (69%) consistently across Canada were concerned about energy, but their preoccupation was cost saving. Environmental benefits were only a concern for 24%. Therefore a committed effort will be needed to bring Ontarians on board – at home and in the workplace. And we will have to accept and address the sensitivity with regard to costs.

More aggressive action is required on climate change and the focus needs to be citizen engagement rather than complaints about increased costs – province-wide, consistent information in multiple formats will be needed. And these messages will need to be reinforced to stress that beyond adding the right products, they must be managed effectively; otherwise, their value is dismissed.

The climate change agenda is really about social change – a revolution - we must find a way to measure success and provide a meaningful message to consumers and businesses so that they embrace this new revolution. The province must lead the conversation and educate municipalities and the public with respect to how provincial planning policies and objectives will impact their existing communities and neighbourhoods so that residents are engaged and informed as to why their communities are evolving.

Developing and participating in the carbon market

Our members have met and discussed the issue of carbon pricing and what model might best apply in Ontario. In the end, we believe that identifying the best model may be beyond our expertise. We do believe that any model that Ontario might consider should ensure that any carbon pricing mechanisms or instruments are conducted in a transparent and equitable manner. The province should also consider directing a portion of these collected revenues towards an innovation fund. The fund could support the development and commercialization of higher efficiency technologies which could in turn be jointly funded by the utilities through their Demand Side Management (DSM) conservation programs. The model that is adopted must ensure that capital stays in Ontario and does not flow to other jurisdictions. This funding in turn should be used to incent projects that will enhance a low carbon economy.

It is important for government to encourage the development of GHG mitigation policies and regulations across all sectors of the economy; and involve energy consumers, the HVAC community,

energy transporters and energy producers. Government policies must be tailored to our energy intensive and export-based economy, and must enable us to remain competitive while making meaningful reductions in GHG emissions. Energy regulators should also be encouraged to consider societal benefits of proposals before them, including GHG emission reductions.

Once Ontario decides which approach it intends to take to best support its objectives, it is critical that the province consults with the jurisdictions that have already established successful programs that are meeting their needs. Therefore, CEEA supports the recommendation by Quest and Quest's Ontario caucus that before the Ministry proceeds with any carbon market that it ask the tough questions related to an effective pricing system, starting with a comprehensive analysis on the experience and implications in Europe, BC, Alberta, and select US states of introducing carbon pricing.

California provides a good example. California was the first US state with a comprehensive cap-and-trade system and it began its planning in 2006.

The Global Warming Solutions Act of 2006 (Chapter 488, Statutes of 2006 [AB 32, Núñez/Pavley]), Commonly referred to as AB 32, established the goal of reducing greenhouse gas (GHG) emissions Statewide to 1990 levels by 2020. In order to help achieve this goal, the California Air Resources Board (ARB) adopted a regulation to establish a cap-and-trade program that places a "cap" on the aggregate GHG emissions from entities responsible for roughly 85 percent of the state's GHG emissions. As part of the cap-and-trade program, the ARB conducts quarterly auctions where it sells emission allowances. These auctions are likely to generate billions of dollars in state revenue over the coming years. The Governor's 2014-15 budget proposes to appropriate \$850 million in auction revenue to various state Programs, including those related to sustainable and affordable communities, state-owned buildings, clean transportation, energy efficiency, natural resources, and waste diversion. The state of California reports regularly to its citizens on distribution of funds and how emission goals are being met. Clearly, California has spent extensive time in terms of getting their program right.

Once Ontario has benefitted from the experiences of others, it will then have to work with the obligated bodies in Ontario – refineries, utilities (gas and electric), transportation authorities – to identify where they can be supportive and what obstacles (i.e. regulatory) may need to be considered to ensure effectiveness. For example, regulated utilities may not now have the scope they require to undertake the type of programs envisaged by the province under a carbon market. CEEA also supports the recommendations made by Quest and Quest's Ontario Caucus and note that their advice on the rules surrounding the creation of a carbon market needs to be heeded so that any steps taken do not have unintended consequences that might undermine steps being taken to reduce emissions such as district energy systems, combined heat and power and waste recovery technologies.

Ontario should establish a clear policy which endorses combined heat and power (CHP) as the preferred option for large industries, condominium buildings or large institutions such as hospitals, universities

etc. Localized CHP electricity generation is not only more efficient and would reduce the province's GHG emissions, but as seen in Europe, it increases grid resiliency and has the added potential to reduce the need for future transmission assets. To encourage industrial customers to invest in the Province, a definitive policy should be established that clearly endorses CHP as a favourable application to reduce GHG emissions in thermal-based processes.

An important consideration will be ensuring that programs developed to incent businesses or residential customers will be successful and inspire consumers to conserve/reduce their carbon footprint. The key to a solid offering would be to supply social benchmarking programs across the province and to provide more tools that go beyond simply improving data availability. The primary focus should be on providing insights or solutions to Ontarians that are convenient, meaningful and personalized.

In many jurisdictions, social benchmarking has proven to both help customers save energy regardless of geography, age or income and also to help increase participation in other conservation or carbon reducing activities. For instance, Opower - a CEEA member company and a behavioural energy efficiency and smart grid customer engagement company - has worked with 85 utilities to deliver energy savings to 17 million residential households across twenty-eight US states and seven countries, including Canada. They have found that their Home Energy Reports program consistently saves between 1.5-3.5%, across geographical and demographic groups. This leads to significant energy and pocketbook savings at scale for consumers—over \$300 million to-date. These results have been verified by over twenty independent evaluations conducted by academics, economists, and consultants (e.g., Navigant, Power Systems Engineering, etc.). And the results show that social benchmarking programs deliver sustained energy savings for both electric and natural gas customers.

In addition, participation in social benchmarking programs can help to increase participation in conservation activities more broadly. For instance, an analysis across 11 utilities conducted by Opower discovered that customers who receive Home Energy Reports participate in utility energy efficiency programs at a 20% higher rate than customers who don't receive these communications.¹ And, these results have been borne out in independent evaluations as well.² This suggests that social benchmarking programs can generally improve awareness of conservation activities and programs in the province as well as improve the overall cost-effectiveness of conservation programs for all consumers.

¹ Gunel, A. *Analytics Insights: Behavioral Programs Enhance Other Utility Energy Efficiency Initiatives*, January 22, 2013, available [here](#).

² For example, see:

- Dougherty Anne, July 2012. "Massachusetts Three Year Cross-Cutting Behavioral Program Evaluation Integrated Report." *Opinion Dynamics with Navigant Consulting*; and
- April 2012. "Puget Sound Energy's Home Energy Reports Program: Three Year Impact, Behavioral, and Process Evaluation." *KEMA Energy & Sustainability*, pg. 1-5.

The role of the building sector – industrial, commercial, residential and commercial

The Canadian Green Building Council states that the annual energy costs for Canada's commercial building sector amounts to \$17.6 billion, with lighting, heating and cooling of buildings representing 50-60% of annual greenhouse gas emissions, so there is much room for improvement. In Ontario, given some of the actions of our Government, that amount is somewhere between 17% and 25% - the door is open for more action.

Striving for better existing building performance will have to be a provincial goal with the province taking a "lead by example approach". Programs like the Canadian Green Building Council's GREEN UP program includes a national database and information system designed to improve the energy and environmental performance of buildings in Canada. It allows building owners and real estate managers to measure energy and water use, compare with peers, set goals to reduce greenhouse gas emissions, and take steps to improve the operational and environmental performance of their portfolio. The program provides cost-effective access to a national database that will include building performance data for office, multi-family, long-term healthcare, hotel, retail, K-12 school, and government buildings.

A renewed vision for climate change action in Ontario should leverage the *Green Energy and Green Economy Act* of 2009 and identify where more can be done.

1. Measure and set targets to educate, spark change and get concrete results.

Promote meaningful measurement. When tenants start demanding highly efficient buildings—especially influential tenants such as the Government of Ontario and MUSH-sector institutions—then the incentive to invest in significant savings will be there.

To help spark this demand, CEEA recommends that these labels be based on actual energy performance results. The label should be easy to understand, showing how one building compares to another in terms of performance so that consumers can truly compare apples to apples. The federal government's soon to be rolled out EnerGuide Rating System (ERS) follows this approach and should be used as a model.

CEEA understands that reduction targets have been set for government and some broader public sector buildings. Efficiency targets are powerful tools for encouraging building retrofits, an approach that is being used increasingly across North America at all levels of government.

The Government of Ontario is working actively with the City of Toronto on developing a building benchmarking systems. Toronto is a recognized leader in terms of aggressively pursuing sustainability

goals for its buildings. However, Ontario extends far beyond Toronto. In 2011 the population of Toronto was reported to be 2,615,060 inhabitants. The total population of next five major cities is 3,000,845. To really achieve success we need to engage the whole province and not just Toronto.

In 2014, CEEA undertook a survey of Canadian Business Attitudes towards energy efficiency, which was conducted by the Gandalf Group.

That survey gave us a very good understanding of Ontario. We learned that:

- Those in the institutional/public sector are particularly likely (89%) to have invested in energy saving measures which indicates that some success has already been achieved;
- 71% of Ontario based businesses consider improving energy efficiency (including energy intensity or lowering GHG) a priority; However, 69% have identified this as critical for cost savings but only 25% are concerned about the environmental benefits;
- 1/3 of renters leave decision making to their landlords; and
- For small employers, perhaps not surprisingly, this is not a priority.

Ontario already has some success. However, the focus cannot be on only the GTA and must extend to the whole province. And smaller and medium-sized businesses, the backbone of the province's economy, need to become part of the climate change resolution.

Ontario should explore further cooperation with willing natural gas utilities to expand their Demand Side Management Programs to include emission reductions targets and incentives. Demand Side Management (DSM) utility conservation programs continue to play a key role in the market adoption rate of newly commercialized energy efficient technologies and best practices. Enbridge also has new construction programs "Savings by Design" that work with Builders and Developers at the design stage to ensure that the buildings are being designed and built 25% better than code.

2. Use a procurement model that aligns interests and produces incentives for deeper energy retrofits.

The structural misalignment of stakeholder interests in the building industry has been widely recognized by leading organizations such as the American Institute of Architects, which is pushing for more innovative models of project design and delivery in the new building sector.³

³ See, for example American Institute of Architects. *Integrated Project Delivery: A Guide*. (2007)

Historically energy retrofit procurement models have focused on awarding contracts to the qualified supplier who presents the lowest design/construction management costs. This approach does not effectively align the interests of owners and professionals when it comes to incentivizing innovative, “lean” projects that generate the highest possible value to the owner. Instead, this approach tends to encourage professionals to spend less time on the design of an innovative deep energy retrofit (opting, rather, for a simple retrofit and lower targets), or to pursue a higher construction cost than might be necessary in the interests of increasing their profit margins.

Given the opportunity that buildings present in meeting Ontario’s climate change objectives, CEEA strongly recommends the adoption of procurement models that evaluate qualified proponents based on the net present value (NPV) of the energy conservation projects they propose in detailed submissions. Under this model, the qualified proponent submitting the highest project NPV (which includes project costs, government incentives, savings and the payback period) is awarded the contract. Simply put, the firms who can design and deliver the highest possible savings using fewer construction dollars wins. Firms should also be held accountable to contractually guarantee the proposed project NPV so that they take on the risk of achieving their targets.

This model incentivizes companies to be creative and invest in the design of innovative deep energy retrofits that will unlock long-term savings and benefits. This procurement framework aligns the interests of all stakeholders to produce exceptional, concrete results.

A successful case study for these recommendations can be found in the province of Quebec as part of its 2006-2015 Energy Strategy. Quebec decided it was going to set an example – and has been successful in developing a procurement model that is based on NPV, which is now mandatory in that province. Millions of dollars were saved, hundreds and thousands of tonnes of GHG emissions were avoided, jobs were created, reliable funding models were established and the importance of the building conservation was communicated proactively too many citizens.

3. Promote Energy Audits and home energy labelling

When it was introduced, the *Green Energy and Green Economy Act* intended to make home energy audits mandatory prior to the sale of homes, unless waived by the homeowner. As this part of the law has never been enforced, energy audits have not really developed a profile that has attracted home owners – they are still mostly unknown. We need to insist that the Real Estate industry informs potential buyers of this opportunity AND we need to ensure that these homeowners understand the value of the information.

CEEA has some knowledge in this area. CEEA’s long-standing member company, EnerQuality, designed and launched Energy Star for new homes. It ensures that homes built to this label standard meet rigorous energy efficiency levels. Nothing similar exists for homes that are not new. Therefore, we

strongly urge the Government of Ontario to put into force the mandatory requirement for energy audits and provide information to perspective homeowners on the benefits to their pocket books in the long run.

We note that the federal government is looking towards introducing Natural Resources Canada (NRCan)'s ERS for homes later in 2015. Most agree it will provide a strong platform for home energy labelling and both present and perspective homeowners will be able to make informed decisions about improving the carbon footprint and energy usage of their homes. We cannot expect the residential sector to deliver on climate change goals if this basic tools is not available.

4. Use the tax system to encourage energy efficiency renovations

Mandatory home labelling in advance of a home sale should lead to more renovations. The challenge is: how do we make this attractive to homeowners? When the Federal Government introduced the EcoEnergy for Home Retrofits with Ontario's support, a great deal of success was achieved that ensured homes were more energy efficient with lower costs and in many cases with a lower carbon foot print. However, grant and contribution programs can be a financial burden for government.

Any effective tax administration system requires consumers and businesses to pay their fair share of taxes. Pressure from the underground economy continues to plague the renovation sector where a high percentage of work is done for "cash". The underground economy exposes homeowners to significant risk they often don't understand and that can threaten their financial security. When consumers and businesses do not pay their fair share, provincial revenues are compromised. This has a direct impact on the programs and services Ontario residents expect and rely on. The \$24 billion renovation sector that employs over 182,000 Ontarians is particularly vulnerable to the 'cash deal'.

The introduction of the single sales tax (13%) in 2010 has exacerbated an existing problem (the GST had already previously encouraged many consumers to seek 'cash deals') and also presents a myriad of issues, including losses in tax revenues and increased risks to consumers. Some of the problems associated with the underground economy for renovations are estimated to include:

- Significant government revenue leakages such as:
 - Loss of up to \$298 million in GST revenue annually;
 - Loss of up to \$1.6 billion in income tax revenue annually;
 - Loss of hundreds of millions of dollars from other revenues such as CPP, WSIB, EHT and Employment Insurance premiums;
- Creating barriers for the industry's future development;

- Warranties are generally non-existent and consumers suffer with little or no recourse in the event of shoddy workmanship;
- Building Code compliance deficiencies;
- Undermining consumer protection measures;
- Introducing risks to consumers (financial and liability);
- Health and safety risks to construction workers;
- Undermining the integrity of the tax system;
- Legitimate contractors have difficulty competing with the underground operator.

CEEA supports the recommendation of the Ontario Home Builders Association (OHBA) for a permanent targeted Home Renovation Tax Credit be established for contractor renovations specifically undertaking work to improve the energy efficiency of existing homes. Such a measure would have the added benefit of strongly encouraging consumers to use legitimate contractors and create a paper trail to deter underground activity while stimulating the economy. The tax credit could be targeted and tailored to achieve a number of specific public policy objectives related to climate change mitigation and adaptation. OHBA notes that the federal Home Renovation Tax Credit (HRTC) was a tremendous success and that a Canada Revenue Agency (CRA) press release on January 25, 2011 stated, “Analysts have estimated it [HRTC] pumped an additional \$4.3 billion in renovation investment into the economy at a time when the recession would have reduced investment in the sector.”

Tax credits are incentive instruments that can survive, and they would encourage Ontarians to deal with reputable contractors. Furthermore, Ontario would be assured that this activity was happening within the tax system.

Given that this instrument would be targeted at homeowners, education and a streamlined approach would be required. Questions would need to be answered: would the rate be the same for all renovations or would there be an increased incentive with projects that are more focussed on reducing the energy intensity of a home?

5. The Ontario Building Code and Municipal Officials

CEEA supports the efforts of the Ontario Government to ensure higher energy efficiency and climate change outcomes in its Building Code. However, this new emphasis in the Building Code on EE outcomes creates new expectations for building officials. Most municipalities are significantly under-resourced when it comes to even basic building code enforcement, which undermines these new objectives. To close that loop, CEEA is asking that the province underwrite the development and rollout of targeted training for building officials. This can be done in partnership with professional organizations like CEEA Member HRAI (Heating Refrigeration and Air Conditioning Institute of Canada. HRAI has

already done some of this in relation to the new CSA F280 (equipment sizing) standard, which educates inspectors and examiners to know what to look for. CEEA understands that municipal buildings departments are hungry for the information but starved for funds, so if Ontario can find a way to provide such training at a lowered (subsidized) cost, it would make a big difference and ensure that the energy efficiency and climate change goals of the Ontario Building Code are met.

6. Communities

According to our colleagues at Quest and the Quest Ontario Caucus urban areas are responsible for the majority of Canada's energy use (60%) and sources of GHG emissions (50%). Therefore, these communities have a key role to play in addressing energy issues and climate change.

Community Energy Plans are fundamental for defining community priorities around energy and greenhouse gas emissions.

CEEA concurs with Quest that when community energy plans are developed in an integrated and principle-based manner as defined by Quest's Smart Energy Communities model, they are fundamental for achieving community-wide GHG reductions as well as for improving energy efficiency, enhancing energy reliability and driving local economic development.

We support Quest's recommendation that states:

Many Ontario communities are currently engaged in developing climate change plans (Hamilton, Burlington, London, Markham, Vaughan, Toronto and many others). Any initiatives contemplated by the Ministry should take into consideration, and support, municipal and community level climate change policies and plans that are currently in place or are under development.

7. Training

Contractors (HVAC, electrical, etc.) with both residential and commercial clients are ambassadors of a lower carbon world. We need to invest in programs that ensure they have all the tools they need to promote conservation. These programs can be administered by groups like CEEA's member, HRAI, who know and understand the contractor universe well and are able to be nimble in terms of program design. These education programs can be funded by government with appropriate evaluation tools in place as they should result in both energy savings for the customer and the province.

Ontario's colleges and Universities can also play a role.

Example: Immigrant Pathways to Green Careers, Seneca College

Run at Seneca College with funding from both the Canadian and Ontario governments, the program assists internationally trained individuals with backgrounds in engineering and the natural sciences with finding jobs in the green energy or environmental sectors. Participants benefit from experiential learning opportunities, participating in green building projects, case studies and workplace tours. Participants are able to access College supports and services including employment counseling and job development activities. Upon completion, participants receive a Ministry approved Graduate Certificate in Energy Management, Environmental Project Management, or Environmental Urban Land Regeneration.

8. Success will depend on increased intergovernmental dialogue and transparency.

The responsibility for policies and programs that impact climate change rests with a variety of provincial departments: the Ministry of the Environment and Climate change; the Ministry of Energy; the Ministry of Municipal Affairs and Housing; the IESO; the Ontario Energy Board; the Ministry of Transportation; the Ministry of Training and Colleges; etc. At present, CEEA understands that there is a relatively small secretariat that is expected to coordinate among these various parties in terms of policy development and consultation. We need this secretariat to be given a higher profile, a clear mandate to coordinate activities and report the results successfully to Ontarians in terms that they can appreciate so they can recognize the benefits and participate with ease. This approach would allow Ontario to speak about climate change activities and programs more holistically and deliver messages to Ontarians that would be more complete.

9. Clean Transportation Policy

Ontario should adopt a broader clean transportation policy that supports a range of low carbon vehicles, including, electric, hybrid (primarily light duty applications) and natural gas (primarily medium/heavy duty vehicles).

10. Establish a Renewable Natural Gas Market

Ontario should support the establishment of a renewable natural gas market (produced from landfills or organic waste from sewage, agriculture and forestry or methanized hydrogen), which would result in creating local supply, employment opportunities and lower GHG emissions through the reduced use of traditionally sourced natural gas in the province.

Conclusion

CEEA is encouraged that this Government has decided to develop a robust climate change agenda. This is a bold and forward-looking public policy approach and the time is right. Our members are eager to work with the Ministry of the Environment and Climate Change, as well as other departments and agencies to ensure that the savings, environmental and economic opportunities of an advanced climate change program are fully realized for the province.