CACEA Canadian Association of Consulting Energy Advisors

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Dear Colleagues,

RE: BC Home Energy Planner

On behalf of the Canadian Association of Consulting Energy Advisors (CACEA), I would like to share feedback on the BC Home Energy Planner (BCHEP) and recommendations to strengthen your desired outcomes by using this tool.

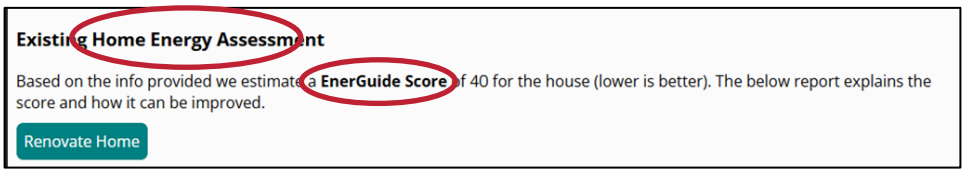
CACEA is a national organization representing registered Energy Advisors (EA), with a strong presence in the new and existing residential housing market in British Columbia. We are proud to work with many stakeholders across the housing industry, and support the growth of affordable, energy efficient, and healthy housing for all residents across the Province.

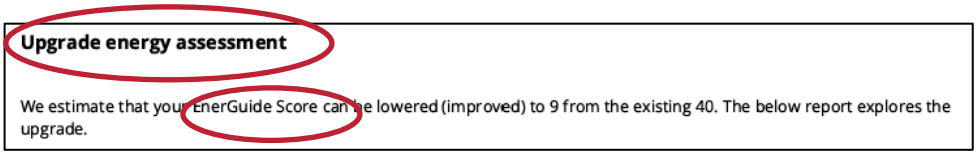
In principle, CACEA supports the use of the BCHEP as an introductory awareness tool for homeowners to enhance their understanding of their home's energy use and efficiency. It is the first step to educate homeowners about their energy consumption patterns and home energy performance, assisting them to make more informed decisions regarding energy-saving upgrades and the health, comfort, and safety within their own homes.

That being said, as the BCHEP is in its pilot/development phase, we want to share our feedback on how the tool's messaging can be improved to ensure the delivery of accurate, safe, and reliable information before its launched across the Province later this year.

1. <u>Use of the "EnerGuide" and "Home Energy Assessment" References</u>

The BCHEP references to "EnerGuide" and "Home Energy Assessment" may confuse homeowner. (See the example below, taken from a BCHEP homeowner's report.)





First, the reference to an "Energy Assessment" is frequently used when addressing in-person EA-led audits, and homeowners may consider the results comparable. The energy review provided by BCHEP does not provide the depth of an energy assessment as performed by an EA. This wording may be misleading as to what the homeowner is receiving. BCHEP reports shared with CACEA by members who have also completed an EnerGuide assessment on their home show that the "scores" and recommendations from the BCHEP do not reflect the actual efficiency of the home.

Second, the BCHEP results do not reflect the value of an in-home observation which captures items beyond energy efficiency, as well as the specific data inputs used to generate the EnerGuide Label rating. For example, there is no blower door test to assess air tightness, specific areas for air leakage, and true energy efficiency. Nor does it address specific house geometry and volume, both of which play key roles when addressing energy efficiency. Referencing EnerGuide could create 'label confusion' and misunderstanding, whereby the homeowner might consider these two "ratings" as being similar. They are not.

We recommend the report generated by the BCHEP use the terms *"general energy consumption snapshot "*(top circle) and/or *"general energy use overview"* (bottom circle).

2. <u>Specific Upgrade Recommendations</u>

CACEA has concerns about the use of 'definitive' statements and word choices which may lead to misleading expectations by homeowners. For example, on the Planner landing page, the pathway indicates that at the end of the BCHEP there is a definitive and individualized upgrade pathway – although a true upgrade roadmap must require an in-person audit of their home. The website and report also use the words "will" or "can" and we recommend using more general wording such as "may". The results from the Planner are not definitive and may not reflect the home's efficiency and retrofit needs accurately.

We recognize the importance of educating homeowners on potential home improvements, such as envelope upgrades, mechanical systems, and air sealing. While highlighting these options is valuable, they should be presented as general information rather than as "the best" upgrades. This ensures homeowners receive helpful education without implying a one-size-fits-all solution.

Making upgrade decisions without professional advice can lead to costly mistakes and serious unintended consequences. A qualified expert can assess the home in person, identifying opportunities and challenges that virtual tools may miss. Their in-depth understanding of building science and the "house-as-a-system" ensures upgrades enhance durability, occupant safety, and overall home health. It should be communicated clearly that to move forward, homeowners must consult with a professional, such as an EA, to avoid costly mistakes and unintended risks to their home's safety and durability and the occupant's comfort and health.

We recognize that clear costing guidance is essential to homeowners' decision-making process and understand the importance of providing accurate cost information. However, we

recommend providing a cost range for each option and disclaimer that the costs noted are a suggestion and may vary with supplier, installation, and final product selection.

Finally, we recommend that the messaging generated from the BCHEP to homeowners should focus on their occupant health, safety, noise reduction, good indoor air quality, more usable space and overall comfort. It may resonate better with them and garner an interest in exploring retrofit options .

3. <u>Clear Reference to EAs and Their Value Proposition</u>

The current presentation of the BCHEP leads one to believe the statements and conclusions presented are definitive, and yet, they are based on preliminary homeowner inputs and localized data. A true assessment and definitive recommendations, however, come from having an on-site audit by an EA.

It is important for homeowners to clearly understand what the BCHEP is designed to do. It is a tool developed to create awareness about a home's energy consumption and potential upgrades that can be made to improve the comfort, health and safety for its occupants. It is an initial step in the process, as it lacks detailed information specific to upgrades for an individual home. For this reason, we are concerned about homeowners only referencing the report's upgrade recommendations. Instead, messaging for the BCHEP, including conversations with an Energy Coach, should include clear guidance to contact an EA as the next step in their home upgrade journey. Currently, neither the Planner, nor the personalized report reference the EA profession, aside from noting "an EnerGuide Energy Evaluation." As noted earlier, on-site observations for potential issues within the home and the air tightness testing are essential, particularly for those who are considering multiple upgrades.

We appreciate that homeowners may not rely on the report alone and may contact the Energy Coach service provided through CleanBC, as suggested in the report. Again, the information provided through this service is limited in scope and accuracy if an on-site assessment of the home is not conducted. Having an EA provide a home assessment ensures the homeowner is put on the best path to make the upgrades that is best suited for them, with consideration for their comfort, health, budget, and most of all, safety. The EA profession is not limited to providing services when incentives/program verification is required. The EA's training and commitment to ongoing learning, resiliency adaptation measures, occupant health and safety, and energy consumption reduction should not be overlooked. In addition, many EAs also are qualified to provide a heat loss heat gain calculation which is needed to ensure the correct sizing of mechanical equipment. There is a strong and willing workforce of EAs available to assist in the successful delivery of the BCHEP which the Province should invest in.

We recommend highlighting the importance and value of using an EA when making energy efficiency upgrades. We suggest the following wording:

> *The upgrade information provided in this report is for information purposes only. Discussions with an Energy Coach can help you to understand the upgrade options and identify incentive opportunities. If you are interested making energy efficiency upgrades and improvements to your home, contact a professional Energy Advisor* HERE (link to Clean BC).*
>
> **Energy Advisors are efficiency professionals helping homeowners and renovators make good decisions – where house components work together, and a home is safe, cost-effective, comfortable, efficient, and resilient.*

4. Building Science Concerns

The BCHEP does not allow for building science fundamentals nor the unintended consequences that may occur when the airtightness of a home is not taken into consideration and on-site blower door testing is not conducted. We strongly emphasize the importance of this practice to the BCHEP program designers as it is a long-standing Canadian building science cornerstone which is currently not recognized by this "virtual" approach. One of the fundamental reasons why the BC Energy Step Code and the 2025 National Building Code require air tightness testing is to reduce the risk of growth of mould and other decay organisms within the building envelope because of air leakage. Together with properly designed mechanical ventilation systems, this creates a more healthy, efficient, and safe environment for both the homeowner and the building itself. These fundamentals also apply to retrofits; by having an Energy Advisor perform a blower door test and discuss retrofit plans with the homeowner, they ensure any unintentional air leakage points are addressed and improvements made with provide a healthy living environment. In addition, ensuring accurate air tightness impacts the proper sizing of mechanical equipment such as heat pumps. In fact, air tightness can impact the load calculations used to size equipment by 20 to 40%. In its absence, equipment is oversized, resulting in short cycling, discomfort and void warranties on equipment - a manufacturer and homeowner warranty nightmare.

From discussions we have had with industry stakeholders, it is also worth noting that national insurance companies in Canada and new home warranty providers are aware of these building science concerns. Should homeowners undertake upgrades to their home based on incomplete information such as that currently outlined in the Planner report, long-term consequences may arise for homeowners with warranty and insurance providers.

The BCHEP is a terrific first step to engage homeowners across the Province to understand how they can make improvements to their home. But it is only that – a first step. Homeowners – particularly those who want to make meaningful upgrades and changes, must consult with knowledgeable professionals such as EAs. Like the Province, CACEA is committed to ensuring all British Columbians have access to healthy, affordable, resilient, and energy efficient housing. We would be pleased to discuss our feedback and recommendations and explore how we can work together to ensure a productive program and encourage homeowners to take the next steps to better performing homes.

Sincerely,

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