

March 5, 2018

Honorable Shannon Phillips Minister of Environment and Parks via email to: <u>aep.minister@gov.ab.ca</u> Honorable Shaye Anderson Minister of Municipal Affairs minister.municipalaffairs@gov.ab.ca 18004-107 Avenue NW Edmonton, AB T5S 2J5 t:780.455.1122/f:451.2152 www.albertaconstruction.net info@albertaconstruction.net

Dear Ministers:

RE: Provincial Government Leadership to Reduce Greenhouse Gas Emissions from Alberta's Buildings

The Alberta Construction Association represents 3200 member firms serving commercial, institutional, and industrial markets. In ACA's September 20, 2016 submission to the Energy Efficiency Advisory Panel (attached), ACA supported the use of funds raised by the carbon levy to GHG emissions reduction. While the work initiated by Energy Efficiency Alberta is a good first step, ACA urges the Government of Alberta to:

- Dedicate a significant portion of the carbon levies to incent building owners to undertake recommissioning and deep retrofits (that is, retrofits of building envelopes, lighting and HVAC systems) of Alberta's building stock, and
- Ensure that carbon levies for energy efficiency remain allocated for that purpose. In particular, where uptake under one program has not been as large as anticipated, funds should be reallocated to different energy efficiency initiatives such as deep retrofits.

In ACA's 2016 submission, the association also acknowledged the barriers to energy efficiency investments in the commercial buildings sector. ACA has become aware of and endorses the concept of PACE (Property Assessed Clean Energy) programs, successfully utilized in other jurisdictions across North America. ACA recommends:

- The Alberta Government create legislation that will enable municipalities to participate in PACE programs, and
- That such legislation foster consistency across different municipalities. Many building owners, and our contractor members, operate across numerous municipalities. Just as there are efficiencies from provincial building codes and tendering practices, ACA anticipates efficiencies for building owners and our members serving those clients from a consistent approach to PACE programs.

ACA would be pleased to discuss our recommendations with you.

Sincerely,

cc. Honorable Premier Rachel Notley Honorable Joe Ceci, Minister of Treasury Board and Finance attachment