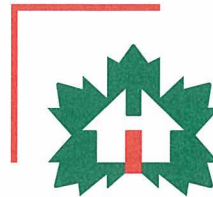


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**Canadian
Home Builders'
Association**



**Association canadienne
des constructeurs
d'habitations**

October 28, 2009

Bruce Clemmensen, Chair
Canadian Commission on Building and Fire Codes
c/o Anne Gribbon, Secretary
Canadian Codes Centre / National Research Council
Building M-23A
1200 Montreal Road
Ottawa, ON K1A 0R6

Re: Proposed research on *Current Construction Practices Related to Energy Efficiency in Part 9 Housing*

Dear Bruce:

This letter provides our comments on the research scope and methodology included in the proposed Terms of Reference for this project, as sent to the Canadian Home Builders' Association (CHBA) on October 22, 2009.

The context for this research is clear, and was the subject of discussion at the last meeting of the Executive Committee of the Canadian Commission on Building and Fire Codes (CCBFC). To reiterate our understanding, the research is required:

- to provide the CCBFC with representative baseline data on current construction practices across jurisdictions, and in the various climate zones of Canada.
- to, in turn, provide a basis by which the CCBFC can assess the cost and energy efficiency impacts of any proposed new energy efficiency requirements considered for adoption in the National Building Code, across jurisdictions, and in the various climate zones of Canada.

In short, provision of such baseline data on current construction practices is essential to the CCBFC's work in this area.

After reviewing the draft Terms of Reference, we offer the following comments:

- 1) We agree with the scope of data localities identified in "optimum matrix of population centres", covering each climate zone.

- 2) We agree with the scope of construction details for Part 9 housing as specified in the Terms of Reference.
- 3) While we understand the requirement for the contractor to review the submitted reports on current construction practices submitted by the provincial and territorial governments, we note that the reports available at the time that the JTG-EEH drafted its report were judged to be inadequate.
- 4) We agree that, for jurisdictions and climate zones where existing provincial and territorial data is inadequate, a survey of current building construction practices is required.
- 5) For jurisdictions where prescriptive energy efficiency-related requirements are currently in place (B.C., Alberta, Manitoba, Ontario, Quebec), we suggest that provincial Codes may provide an initial basis for estimating baseline construction practices. However, in all such cases, some field verification will also be needed to validate the baseline.
- 6) For jurisdictions where current Code does not provide such a prescriptive basis (Saskatchewan, New Brunswick, Nova Scotia pre-December 2009, Newfoundland and Labrador, the Territories), a broad survey of recently constructed homes will be needed to develop a representative baseline. To the extent possible, this should provide insight into the typical minimum level of energy efficiency currently achieved in each jurisdiction.
- 7) In all cases, it will be necessary to address both the construction practice details laid out in the Terms of Reference, as well as providing a representative measure of energy performance resulting from these practices. At present, the best available tool for measuring energy performance is the EnerGuide Rating System (ERS). Reflecting this, we would see the provision of ERS values for typical Part 9 units in each centre as an essential element in the baseline research. This should include a representative range of common dwelling types (e.g., bungalow, two-story, ranch, etc), to provide the CCBFC with an understanding of the range of energy efficiency outcomes resulting from the use of common construction practices in differing designs.

We would reiterate the importance of generating adequate data on both current construction practices **and** energy performance outcomes. Such data will be essential to the CCBFC's task assessing, in an accurate and geographically sensitive manner, the cost and energy performance impacts of proposed national Code requirements related to energy efficiency.

In summary, we suggest that, while the draft Terms of Reference provide a good starting point in defining what is required to generate the needed baseline data on Part 9 buildings, the research scope needs to be more robust and broader than proposed. Given this, we suggest that the project timelines are likely also to need some adjustment.

Yours truly,



John Kenward
Chief Operating Officer

cc: CHBA Executive Board