

150 Laurier Avenue W.
Suite 500
Ottawa, Ontario
K1P 5J4

T. 613 230 3060
F. 613 232 8214
E. chba@chba.ca
W. www.chba.ca

Canadian
Home Builders'
Association



Association canadienne
des constructeurs
d'habitations

January 18, 2010

Bruce Clemmensen
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: National Energy Code for Houses and Small Buildings - Policy Issues

Dear Mr. Clemmensen:

The effort required to revise the National Energy Code for Houses and Small Buildings (NECH) could be reduced considerably if the new task group could be provided with policy direction from the outset. As requested, I am writing to provide a list of key questions:

- Should the new requirements use the market-zone model as per the current version of the NECH or adopt the climate-zone model as proposed by the Standing Committee on Energy Efficiency in Buildings (SCEEB)?
- Should there be one set of requirements regardless of fuel source as proposed by SCEEB rather than different requirements depending on fuel source as per the current version of the NECH?
- Should there be one set of requirements for all building forms as proposed by SCEEB or separate categories of requirements for non-stacked residential, stacked residential and other commercial?
- Should there be one set of requirements for all forms of construction as proposed by SCEEB (ie. the same R-value for flat roofs and attic roofs) or should there be different requirements as per the current version of the NECH?
- Should current provincial requirements for thermal resistance be at least matched?
- Should there be a relationship between the new requirements and the requirements in the current version of the NECH (ie. a percentage increase in performance)?

- Based on the results of housing “baseline” data currently being developed, should the new requirements reflect current “good practice”, or exceed it? If the latter, what performance target would be adopted?
- Is there a target payback period for the costs of energy-related requirements?
- Should a “simple payback” or “life cycle” approach be used?
- Should there be efficiency requirements for equipment above those already regulated under the Energy Efficiency Act as proposed by SCEEB?
- If a building has less than the maximum window area, can the thermal resistance of other components be reduced as long as the total heat loss remains the same?

A discussion paper on these questions along with recommendations could foster useful discussion at the upcoming CCBFC meeting in February. The results could then inform and focus the new task group as it begins to engage in its important work.

Yours truly,



John Kenward
Chief Operating Officer

cc: CHBA Executive Board