



Change Request Ruling

Change Request: CR-000026 Alternative Compliance Path - RFI Eligibility

ID #: CR-000026
Submitted By: Chris Dyal
Submitted On: November 7, 2025
Ruling Date: January 17, 2026
Ruling: **Change Request Approved.**

**Reason for
Change Request
and
Recommended
Alternative:**

Summary: Current implementation of alternative compliance rulesets can be extremely challenging to meet with homes that have very small heated volumes (less than ~150 m3 total heated volume). This is due to the implementation of standard operating conditions, baseloads from the EnerGuide Rating System program adding a static GJ value to homes of all sizes, regardless of anticipated occupant count or behavior based on the home's geometry or available bedrooms. The nuance is one layer deeper as we compare base loads between a "house" and a "MURB" or "MURB Single Unit" in regard to ERS determining the number of occupants present in different unit types; this changes the final GJ value of the home. This change request is not seeking a reduction in the strictness of the alternative compliance targets, but rather more acceptance in the "Request for inclusion" clause. Unintended Consequence: Very small homes are challenging to meet the Alternative Compliance requirements, and in some cases, where the roof area is also not available to comply with the solar requirements via the standard method, this clause is exclusionary. This has the unintended consequence of excluding applicants to the program that are displaying clear respect and regard for the CHBA Net Zero technical requirements elsewhere in their projects. For homes of this size, budgetary constraints are often significant; economic restraints are prohibitive for these projects, as they tend to be affordable housing projects. The case that triggered this change request is a tiny home affordable housing project that wishes to be CHBA Net Zero labeled to support UN 2030 Climate Goal Initiatives. Homes that must meet the intent of this appendix via performance targets may ultimately be faced with envelope or mechanical system upgrades that are out of scope for their funding.

Current Phrasing: "Houses that exceed the maximum heated volume may submit a request for inclusion (RFI) to be reviewed by the Net Zero Technical Committee for possible approval. This flexibility will inform future versions of the program." (Via Appendix A: Net Zero Ready Alternative Compliance Path)

Suggestion for New Phrasing: "Houses that are either within, or exceed, the heated volume scope of this section, wherein a Registered Energy Evaluator has good cause to believe that this home would otherwise meet the technical rigor of the CHBA Net Zero Ready program's alternative compliance section, may submit a request for inclusion (RFI) to be reviewed by the Net Zero Technical Committee for possible approval. This flexibility will inform future versions of the program." It is suggested that the RFI include documentation demonstrating the home meets the intent of the other applicable sections of the CHBA Net Zero program, such as Section 2.2.2(1) "Energy Efficiency Targets" of the Technical Requirements.

Conclusion: Since the homes are still being exposed to technical scrutiny at multiple levels, the above phrasing poses minimal risk to all parties involved, including the final residents, the client, and CHBA as a program provider. This method will also enable both the client and CHBA to achieve their respective goals of introducing a progressive product type into the program and strengthening the client's ability to demonstrate implementation of the core values outlined in the CHBA Net Zero technical standards. Cases such as this can also be strong data collection opportunities for Energy Evaluators, CHBA, and the technical committee to further strengthen program

**Additional
Comments /
Actions:**

Approved. 6 votes in favour. 0 votes not favour. 1 member abstained.

Program Participants may use the amendments once they are posted - prior to the official version update.