



24 April 2018

To:  
Devon Miller, Community Energy Planner,  
Sustainable Planning and Community Development,  
City of Victoria  
by email: [dmiller@victoria.ca](mailto:dmiller@victoria.ca)

Dear Mr. Miller,

**Re: City of Victoria proposed approach to the Step Code for building energy efficiency – Addendum**

Please accept this addendum to my comments of 28 February 2018.

Further to my letter of 28 February, I understand City staff have changed their recommendations such that high-rise residential and commercial office buildings would be required to meet Step 2 by January 2020, rather than Step 3 as originally proposed.

There will always be arguments in favour of lower energy efficiency standards, including especially the saving of up-front costs. I urge the City to consider the Step Code requirements in the context of the long-term need to move to energy sustainability.

Large apartment and office buildings will be in use for many years into the future, and their good or bad energy performance will similarly be with us for many years. It is generally far less costly to ensure good energy performance at the time of construction than to achieve it in the future through retrofits.

Sincerely,

BCSEA Policy Advisor