

Committee of the Whole Report For the Meeting of April 26, 2018

To:

Committee of the Whole

Date:

April 13, 2018

From:

Jonathan Tinney, Director, Sustainable Planning and Community Development

Subject:

Recommended Adoption of BC Energy Step Code

RECOMMENDATION

1. That Council adopt the following approach to the BC Energy Step Code, and direct staff to prepare the necessary building bylaw amendments as follows:

a. For new Part 9 buildings:

- Step 1 building bylaw requirement starting on November 1st, 2018 for all new Part 9 buildings
- ii. Step 3 building bylaw requirement starting on January 1st, 2020 for all new Part 9 buildings with the exception of small single family homes/garden suites
- iii. Step 2 building bylaw requirement starting on January 1st, 2020 for all new small single family homes/garden suites
- iv. The development of a tiered fee program to support Part 9 builders to use an energy advisor, conduct a mid-construction blower-door test, conduct a post-construction verification blower-door test, and obtain a home EnerGuide label.
- b. For new Part 3 buildings:
 - i. Step 1 building bylaw requirement starting on November 1st, 2018
 - ii. Step 3 building bylaw requirement starting on January 1st, 2020 for wood-frame midrise (under 6-storeys) residential buildings
 - iii. Step 2 building bylaw requirement starting on January 1st, 2020 for concrete highrise (over 6-storeys) residential buildings
 - iv. Step 2 building bylaw requirement starting on January 1st, 2020 for commercial office buildings.
- That staff proceed with preparation of a sustainability checklist for rezoning and development permit application forms that reference Step Code requirements as well as other sustainable design elements that are reflective of City goals and policies.

EXECUTIVE SUMMARY

The BC Energy Step Code is a new performance-based building code that establishes measurable energy-efficiency requirements for new construction. The Step Code is a Provincial building code that came into effect on December 15, 2017, after which time local governments can choose to opt in and either require or incentivize meeting the requirements of the code. The role of municipalities is to establish an appropriate implementation strategy for the Step Code in their local context.

The Step Code applies to Part 9 and Part 3 residential and commercial buildings. Part 9 buildings are three storeys or less and have a building area no more than 600 square metres. These include single family homes, duplexes, townhomes and small apartment buildings. Part 3 buildings are four storeys and taller, and greater than 600 square metres in building area. They include larger apartment buildings, condos and office buildings.

Staff received Council direction to consult with industry on a proposed approach to Step Code at the January 18, 2018 Committee of the Whole meeting. Following Council direction, staff undertook a second round of industry engagement in collaboration with the Urban Development Institute – Capital Region, Canadian Home Builder's Association – Vancouver Island, Vancouver Island Construction Association, Capital Regional District's Climate Action Program, District of Saanich and District of North Saanich, with the purpose of receiving feedback on the proposed approach.

The purpose of this report is to [1] provide Council with results and feedback from industry consultation on the proposed adoption approach to the BC Energy Step Code, [2] provide a final recommended approach for Step Code adoption, and [3] seek Council's direction to prepare the necessary building bylaw amendments necessary for Step Code adoption.

PURPOSE

The purpose of this report is to seek Council approval with regard to a recommended adoption approach to the BC Energy Step Code.

BACKGROUND

Since August 2017, staff have been collaborating with the CRD and local municipalities on education, industry engagement and training opportunities related to the Step Code. A full list of the engagement events undertaken can be found in the Engagement Summary in Attachment A. This engagement helped to inform a proposed approach to adoption of the Step Code to seek feedback from industry, and this proposed approach was presented to the Committee of the Whole (COTW) on January 18, 2018.

Following Council direction to consult with industry on a proposed approach to Step Code, staff undertook a second round of industry engagement in collaboration with the Urban Development Institute – Capital Region, Canadian Home Builder's Association – Vancouver Island, Vancouver Island Construction Association, Capital Regional District, District of Saanich, and District of North Saanich with the purpose of receiving feedback on the proposed approach.

Council Commitments and the 2018 Climate Leadership Plan

In August 2016, Council committed to a long-term greenhouse gas (GHG) reduction target of 80% by 2050 for both corporate and community emissions, including a corresponding specific target of 100% renewable energy.

The building sector accounts for 50% of the City's GHG emissions, and represents a substantial opportunity for improvement. Based on our 2007 community GHG emissions, residential buildings contributed 16.5% of all GHG emissions, while commercial buildings contributed over 25%, with half of the total GHGs coming from space heating and cooling.

The 2018 Climate Leadership Plan sets out goals and targets for Low Carbon, High Performance Buildings and the adoption of the Step Code aligns with Goal 1: Buildings are highly energy efficient, using only a small fraction of their 2017 operational energy needs, and also aligns directly with the target that states "By 2030, all new buildings are 'net zero energy ready'."

Industry Engagement on Proposed Approach

Staff have been collaborating with the CRD Climate Action Program, District of Saanich, North Saanich, and other local municipalities on a program of education, industry engagement and training opportunities since August 2017. Those engagement activities that were undertaken in the fall of 2017 were summarized in the January 18, 2017 COTW report, and a detailed engagement summary can be found in Attachment A.

Following Council direction to engage with industry on a proposed approach, staff undertook the following activities:

- 1. Building Industry Workshop #2 (February 21, 2018)
 - 45 attendees
 - Co-hosted by Urban Development Institute Capital Region, Canadian Home Builders Association – Vancouver Island, Vancouver Island Construction Association, District of Saanich, District of North Saanich, CRD CAP
- 2. Building Industry Workshop #3 (February 22, 2018)
 - 36 attendees
 - Co-hosted by Urban Development Institute Capital Region, Canadian Home Builders Association – Vancouver Island, Vancouver Island Construction Association, District of Saanich, District of North Saanich, CRD CAP
- 3. Industry Survey #3 (February 21 March 28, 2018)
 - 102 responses
- 4. Part 3 Residential Developers focus group1
 - 8 attendees
 - Co-hosted by Urban Development Institute Capital Region, and District of Saanich.

ISSUES & ANALYSIS

Approach to Step Code in other BC Communities

- At the time of writing, the following local governments have adopted the Step Code:
 - City of North Vancouver
 - District of North Vancouver
 - District of West Vancouver.
- At the time of writing, the local governments listed below have provided a notification to the Province stating their intent to engage with industry on an adoption approach to the Step Code. Together, these municipalities make up more than 60% of residential building permits in BC:
 - o City of Richmond June 16, 2017
 - o City of North Vancouver July 4, 2017
 - o City of Campbell River July 10, 2017
 - o City of Duncan August 24, 2017
 - o District of North Vancouver September 1, 2017

¹ Through the engagement process, it was identified that the Part 3 residential developer community was under-represented in the engagement process, and this focus group was coordinated by UDI and held at City Hall in an effort to ensure that this audience had the opportunity to provide feedback on the proposed approach

- o City of Victoria September 27, 2017
- o District of Saanich September 27, 2017
- Comox Valley Regional District October 3, 2017
- o District of North Saanich October 4, 2017
- Resort Municipality of Whistler October 5, 2017
- District of West Vancouver October 24, 2017
- o Township of Langley November 7, 2017
- District of Squamish November 9, 2017
- o City of New Westminster November 28, 2017
- o City of Surrey December 7, 2017
- o City of Kelowna January 22, 2018
- o City of Penticton January 27, 2018
- o City of Burnaby March 1, 2018
- o City of Kimberley March 12, 2018
- o City of Vernon March 19, 2018
- Village of Belcarra March 27, 2018
- o District of Peachland March 28, 2018.
- The District of Saanich is in a similar point in their adoption processes as the City of Victoria, and Saanich staff have been involved in engagement processes to date.
- North Saanich have also been involved and are in a similar point in their adoption processes as the City of Victoria.
- Other local governments in the CRD have indicated that they may recommend a similar approach to Step Code adoption as what is recommended in the City of Victoria, but have not formally notified the Province of their intention to engage.

Feedback from Industry on Proposed Approach

Following Council direction, and through the second round of engagement with development industry representatives, home builders, architects, designers, engineers, and others, staff asked for feedback on three key areas of the proposed approach:

- 1. the proposed Steps and their associated requirements
- 2. the timelines proposed, and
- 3. the application process.

Feedback on each of these can be found in this section, and a detailed engagement summary can be found in Attachment A.

Proposed Step Requirements

Staff sought feedback related to the technical requirements of the proposed Steps, as well as industry capability and readiness for building to those requirements. Staff also sought feedback related to the proposed rebate program for Part 9 builders.

Feedback from Part 9 builders and developers included:

- Step 1 interim period viewed as providing a learning opportunity for performance-based approach to design
- Step 3 viewed as achievable and noted that many are building to this standard now
- some concern regarding affordability and cost implications of Step 3
- the need to ensure that Energy Advisors are accredited and quality assurance is included

- the need to communicate customer benefits explore making building energy labelling mandatory
- rebate program viewed as a reasonable gesture and worthwhile for promoting the midconstruction blower door test, but also viewed by some as too small of an amount to make a meaningful difference.

Feedback from Part 3 builders and developers included:

- Step 3 for high-rise/concrete residential and commercial office viewed as a challenge in terms of design and cost implications
- concerns around cost and impacts on affordability for Step 3
- the need to review and amend design guidelines and policies to support the adoption of the Step Code
- concerns around availability of energy modelers in the local market
- concerns around lack of awareness of air tightness testing technical requirements and process for Part 3 buildings.

Timelines

Staff sought feedback on the timelines of Step 1 adoption starting on November 1st, 2018, followed by Step 3 adoption starting on January 1st, 2020. As per Council direction, staff also sought feedback on potential accelerated timelines.

Feedback from Part 9 builders and developers included:

- Step 1 interim phase is viewed positively by some; for others it was viewed as too short a time frame where not enough projects will be able to benefit from the interim period
- Step 3 on January 1st, 2020 was generally viewed as reasonable, though some viewed this
 as too ambitious of a timeline
- · many viewed training as the key to success in meeting the proposed timelines
- there was little positive feedback related to the notion of accelerated timelines.

Feedback from Part 3 builders and developers included:

- timelines viewed as too fast for some (Step 3 for Part 3 high-rise residential and commercial in particular)
- interim Step 1 period not viewed by some as providing much value, as the timelines are longer for these complex projects
- there was little positive feedback related to the notion of accelerated timelines, although some noted that the Step 1 interim period could begin earlier, in order to create a longer interim period prior to January 1st, 2020.

Application Process

Staff sought feedback on the application process, which included expectations in terms of administration, the role of energy advisors and modellers, and considerations for how projects that are currently underway (or 'in-stream') will be impacted.

Feedback from Part 9 builders and developers included:

- general support for the process and acknowledgement of importance of mid-construction blower door test
- the need for training on behalf of City staff to ensure smooth roll-out and processing
- concerns that Step Code requirements and administration may alter the processing timelines of development applications.

Feedback from Part 3 builders and developers included:

- some would like requirements to be triggered at the time of rezoning or development permit
 application as opposed to at the building permit stage to provide project teams with more
 clarity earlier on in the development process
- concerns around lack of awareness of air tightness testing technical requirements and process for Part 3 buildings
- concerns that Step Code requirements and administration may alter the processing timelines of development applications.

OPTIONS & IMPACTS

Guiding Principles

The approach taken to date has been guided by a goal of providing balance between the criteria below, and consideration was made to ensure the final recommended approach addresses these criteria well.

Industry capacity and readiness

- ensure, through engagement and dialogue, that the building industry is able to deliver projects at the proposed Step(s)
- minimize risk of non-compliance with the adopted Step(s)

2. The City's climate action goals

 understand and articulate the City's climate action goals to stakeholders and ensure the approach is reflective of these goals

Cost implications

- acknowledge and identify costs associated with each Step and minimize potential impacts to housing affordability
- · understand and identify potential operational cost savings related to energy efficiency

4. Regional coordination

 reduce confusion across municipal boundaries and aim for a coordinated, performancebased approach to building in the region with our municipal neighbours

5. Clarity regarding timelines and steps

 provide clear expectations regarding what Step(s) will be required, when they will be required, and how the application process will be administered.

Recommended Adoption Approach to the BC Energy Step Code

The Step Code is organized into Lower and Upper Steps according to different building types (see Figure 1).

- To achieve the Lower Steps, building and design professionals and trades can rely on conventional building designs with careful air-sealing practices and incrementally incorporate some key elements in the design, building envelope, and equipment and systems. Local governments are encouraged to focus adoption on the Lower Steps.
- To achieve the Upper Steps, builders and designers will need to adopt a more integrated approach to building design, and may need to incorporate more substantial changes in building design and construction. Such approaches are potentially more costly and challenging without additional training and experience, and for these reasons are not recommended to be adopted as a base building requirement in the short term.

It is important to note that there are a different number of Steps for each building typology, with 5 Steps for Part 9 buildings, 4 Steps for Part 3 residential, and 3 Steps for Part 3 commercial buildings (see Figure 1). As such, Step 3 is not equivalent for each building typology. The proposed approach staff received Council direction to engage upon in January 2018 included Step 3 for all building types, meaning the adoption of Upper Steps for Part 3 high-rise concrete residential and commercial buildings. The final recommended approach to adoption outlined herein focuses on the Lower Steps of the Code.



Figure 1 - Definition of Lower and Upper Steps by building type (Part 9 and Part 3), and recommended Steps to adopt (highlighted)

Part 9 Buildings

Part 9 buildings are three storeys or less and have a building area no more than 600 square metres. These include single family homes, duplexes, townhomes and small apartment buildings. Since 2012, the City has seen an average of 40 applications per year for the construction of Part 9 residential projects, including:

- an average of 27 single-family homes per year
- · an average of 4 townhomes per year
- an average of 9 duplexes per year.

Recommended Step Code Adoption for Part 9 Buildings

Part 9 (excluding small SFD)	Part 9 Small SFD (garden suite)	
Step 1 November 1, 2018	Step 1 November 1, 2018	
Step 3 January 1, 2020	Step 2 January 1, 2020	

Part 9 (excluding small SFD)	Part 9 Small SFD (garden suite)	
Step 4/5 – to be determined*	Step 3/4/5 – to be determined*	

^{*} Staff recommend taking a monitor and adapt approach for increasing Steps following January 2020. This approach will allow for a period of time to analyze what Step projects are achieving, in order to solidify an appropriate timeline for adoption of the next Step(s). Staff will report back on recommendations for adoption of the next Steps in 2021.

Rationale

While there was some concern from a minority of participants around the timelines being too fast (see previous section outlining feedback), no changes to the recommended approach were made, as Step 3 was generally viewed as achievable, assuming there is access to training and ample warning. Staff have noted that both the Canadian Home Builders' Association and BC Housing have already begun training programs related to the Step Code, and access to training is not anticipated to be a challenge going forward. The rebate program was viewed as a nice gesture but not seen as making a big impact in terms of easing the transition.

As noted in previous reports, the Step 2 approach is recommended for small single family homes/garden suites, primarily due to the fact that some of the air tightness metrics are more difficult to achieve and the costing report has a higher associated incremental construction cost premium for each of the Steps for this building type. As these buildings are smaller and therefore lower energy users on aggregate, staff recommend this as an appropriate approach to small single family homes/garden suites.

Tiered Fee Program

The Step Code requires applicants to hire an energy advisor and conduct a post-construction blower door test. Feedback to date suggests that these process requirements represent a substantial shift in project delivery for some Part 9 applicants. Acknowledging this may present challenges to applicants, staff propose the creation of a tiered fee program for builders whereby the fee would be reduced for a builder's first time through the new process.

To be eligible for a reduced fee, applicants will have to demonstrate that they have:

- 1. hired a licensed energy advisor.
- 2. conducted a mid-construction blower door test.
- 3. conducted a final, post-construction blower door test, and
- 4. completed an EnerGuide rating and label for the new home.

In order to ensure that builders carry out the above requirements, the fee for a building permit will be reduced by \$500 at the time that they apply for building occupancy, which means that the City will provide the builder with \$500 back at that time (because they would have already paid the full building permit fee earlier in the process). The reduced fee would be designed to be limited to one builder/developer, and would be available for the interim Step 1 period (November 1st, 2018 to December 31st, 2019) or as funds allow. It is worth noting that BC Hydro has announced a funding offer of up to \$20,000 to assist eligible communities in providing such a program, and that amount is anticipated to cover the majority of applications we would see over the course of the period.

Part 3 Buildings

Part 3 buildings are four storeys and taller and greater than 600 square metres in building area. They include larger apartment buildings, condos and office buildings. The majority of new housing units in the City of Victoria are in Part 3 buildings.

- Since 2012, the City has seen an average of eight applications per year for the construction of new Part 3 residential projects, and an associated average of 593 total units per year.
- Since 2012, the City has seen an average of three applications per year for the construction of new Part 3 office projects.

Recommended Approach for Part 3 Buildings

Part 3 Residential (mid-rise / wood-frame)	Part 3 Residential (high-rise / concrete)	Part 3 Commercial
Step 1 November 1, 2018	Step 1 November 1, 2018	Step 1 November 1, 2018
Step 3 January 1, 2020	Step 2 January 1, 2020	Step 2 January 1, 2020
Step 4 – to be determined*	Step 3/4 – to be determined*	Step 3 – to be determined*

^{*} Staff recommend taking a monitor and adapt approach for increasing Steps following January 2020. This approach would allow a period of time in which to analyze what Step projects are achieving, in order to solidify an appropriate timeline for adoption of the next Step(s). Staff will report back on recommendations for adoption of the next Steps in 2021.

Rationale and Changes to Approach Based on Feedback

Staff recommend a change in the adoption approach for Part 3 high-rise/concrete residential and Part 3 commercial buildings. The proposed approach presented in January 2018 included adoption of Step 3 by January 2020 for all Part 3 building types. Although Step 3 is a Lower Step for Part 9 development, it is considered an Upper Step for high rise/concrete and commercial Part 3 development (see Figure 1).

Meeting the requirements of Step 3 for these buildings types may require substantial changes in building design (including but not limited to window-to-wall ratio and concrete-slab balconies) and cost implications associated with systems. Given this, and feedback heard through the workshops as well as in a focus group with Part 3 residential developers, staff recommend changing the approach to Step 2 adoption for these building types. This approach will ensure industry capability while not significantly impacting other City goals related to climate action.

Option for Part 3 Buildings

An option for Council to consider is to require Step 2 as a base building requirement for Part 3 highrise/concrete residential and commercial buildings, as stated above, with Step 3 included as a rezoning policy consideration for these building types.

Application Process and In-Stream Applications

The application process is recommended to be as follows (see Figure 2):

- Projects that have applied for building permit prior to November 1st, 2018 will be considered in-stream and will not be subject to Step Code requirements.
- Building permits applied for between November 1st, 2018 and December 31st, 2019 will need to demonstrate compliance with Step 1 of the Step Code.
- Building permits applied for after January 1st, 2020 will need to demonstrate compliance with the Steps adopted for that building typology:
 - Step 3 for Part 9 homes (excluding small homes/garden suites)
 - o Step 2 for Part 9 small homes/garden suites
 - Step 3 for Part 3 mid-rise/wood-frame residential buildings
 - Step 2 for Part 3 high-rise/concrete residential buildings and commercial buildings.
- For Part 9 projects:
 - A pre-construction compliance report (see Attachment B) will need to be filled out by a licensed energy advisor and submitted along with the building permit application
 - An as-built compliance report (see Attachment C) will need to be filled out by a licensed energy advisor and submitted along with the occupancy permit application.
- For Part 3 projects:
 - Letters of assurance submitted for building permit will indicate responsibility for meeting Step Code requirements
 - Letters of assurance submitted for occupancy upon completion of a project will indicate Step Code requirements have been met.

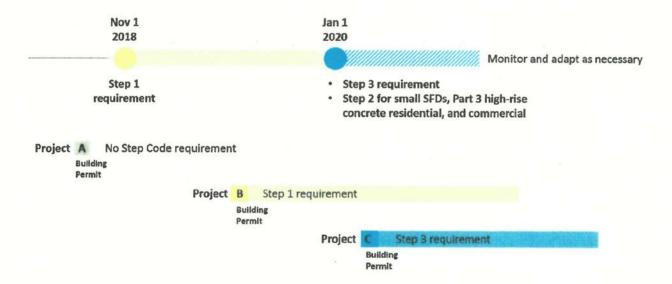


Figure 2 - Diagram illustrating when Step Code requirements will be triggered during the application process, should it be adopted

Recommended Future Work

Based on feedback heard in our industry engagement, as well as actions outlined in the Climate Leadership Plan, there are a number of additional and related pieces of work that staff recommends undertaking, should Step Code be adopted.

Sustainability Checklist for Rezoning and Development Permit Applications

Currently, providing green building details is a requirement for all Rezoning Applications and Development Permit Applications that include new construction. Applicants submit details of the green features contained within the development in the form of a letter, along with the other requirements of the application. By submitting and signing the application, the applicant is providing a voluntary commitment to include the green features as indicated in the letter to Council. In the cases where the green features are required as a condition of rezoning, further documentation may be required.

Staff recommend updating this to be a Sustainability Checklist that references Step Code requirements as well as other sustainable design elements that are reflective of City goals and/or policy (e.g., bicycle parking rates, electric vehicle charging station guidance, stormwater management and other low-impact development strategies, etc.). This scope of work would be intended to be done in consultation with industry representatives.

The intention of this checklist would be to:

- provide sustainable design details of applications to Council in a more concise and easily legible fashion with each development application, for ease of comparison, tracking, and decision making
- make the process more uniform and consistent, so that it is more efficient for both applicants
 and development services staff to undertake and/or process. The current letter format is
 often received in different formats and levels of detail, and it can be challenging and time
 intensive to identify those aspects of the building that align directly with the City's climate
 actions goals.

GHG intensity reporting

While the Step Code is focused on energy efficiency, it does not require the reporting of GHG emissions associated with a project. Compliance forms provide an optional section where the GHG intensity of the project can be voluntarily provided. In light of Council climate action goals related to GHG reduction, staff recommend exploring the requirement of GHG intensity reporting following a period of monitoring with regard to Step Code roll out. This was not an aspect to adoption that staff discussed with industry, and is thus recommended to be viewed as an additional area for exploration that may be layered on to the approvals process in the future.

Home Energy Labelling and Energy Benchmarking

Home energy labelling has been identified as an important precursor for market transformation on energy efficient buildings, and developing a home energy labelling strategy is included as an action in the Climate Leadership Plan. While transparency through labelling has become standard practice in other facets of our lives, from food nutrition to the energy consumption of home appliances, prospective homeowners are left in the dark as to the operating costs of what is likely the largest investment of their lives.

Local governments that opt into using the BC Energy Step Code will be requiring all new buildings to undertake energy modelling and air tightness testing, two elements that are required in the procurement of home energy labelling. This represents a critical opportunity that can help set the stage for mandatory energy labelling on new buildings (something that higher levels of government

have indicated is forthcoming), given it will address the cost barrier of requiring an energy evaluation for the purposes of labelling alone. As local governments contemplate the best tools and approaches for adopting Step Code, there is an opportunity to [a] capture the data local governments need to make informed decisions about programs and policies and [b] make the information available publically or to current and future building owners.

Benchmarking is the process of providing and sharing energy consumption data, and is a term typically used to describe that practice in larger, more complex buildings (Part 3 buildings). Similar to the case of home energy labelling, Step Code implementation presents an opportunity to request that benchmark energy consumption data be shared, using the EPA's Energy Star Portfolio Manager.

Neither home energy labelling nor energy benchmarking was discussed with industry in significant detail during Step Code engagement, and these items are recommended to be viewed as an additional area for staff to potentially explore and report back to Council on in the future.

Accessibility Impact Statement

The BC Energy Step Code will not impact a builder, designer, or developer's ability to incorporate accessible design requirements, and all existing code requirements regarding safety and access remain.

2015 - 2018 Strategic Plan

The BC Energy Step Code aligns with objectives 1 - Innovate and Lead, 3 - Strive for Excellence in Planning and Land Use, 12 - Take Climate Action and Prepare for Emergencies, and 13 - Demonstrate Regional Leadership.

Impacts to the Financial Plan

The implementation of a rebate or tiered fee structure program for Part 9 builders as described in the report may require some additional staff resources in terms of administration. BC Hydro does have a funding offer of up to \$20,000 for eligible local governments to assist in the implementation of such a program.

Official Community Plan Consistency Statement

OCP Sustainability Vision:

"Victoria is an urban sustainability leader inspiring innovation, pride and progress towards greater ecological integrity, livability, economic vitality, and community resiliency confronting the changes facing society and the planet today and for generations to come, while building on Victoria's strengths as a harbour-centred, historic, capital city that provides exceptional quality of life through a beautiful natural setting, walkable neighbourhoods of unique character, and a thriving Downtown that is the heart of the region."

Section 12 - Climate Change and Energy Goals:

 12(b) - New and existing buildings are energy efficient and produce few greenhouse gas emissions.

Section 12 – Climate Change and Energy Broad Objectives:

- 12(a) That climate change is mitigated through the reduction of greenhouse gas emissions from buildings, transportation and solid waste.
- 12(c) That community energy consumption and generation are managed to give priority to conservation and efficiency, diversification of supply, renewable energy, and low carbon fuels.

CONCLUSIONS

This report outlines a recommended approach to adoption of the BC Energy Step Code for Council's consideration. The recommended approach provides a balance between evaluation criteria and goals, which are reflective of what staff have heard to date through the project engagement process. Based on the results of the industry engagement and analysis above, staff are seeking Council's direction to prepare the necessary building bylaw amendments necessary for Step Code adoption.

Respectfully submitted,

Devon Miller

Community Energy Planner Community Planning Division Jonathan Tinney Director

Sustainable Planning and Community

Development Department

Report accepted and recommended by the City Manager

Date:

List of Attachments

- Attachment A: BC Energy Step Code: Capital Region Phase 2 Engagement Summary
- Attachment B: Part 9 Pre-Construction Compliance Form
- Attachment C: Part 9 As-Built Compliance Form
- Attachment D: Letter from BC Sustainable Energy Association regarding proposed approach.