



Housing Services Corporation

30 Duncan Street, Suite 500 | Toronto, ON Canada | M5V 2C3
t. 416 594 9325 | tf. 1 866 268 4451 | f. 416 594 9422 | www.hscorp.ca

August 25, 2020

Ministry of Energy, Northern Development and Mines,
Conservation and Renewable Energy Division
77 Grenville St., 5th Floor
Toronto, ON M7A 2C1

Attention: Melanie Torrie, Senior Policy Advisor

RE: ERO # 019-2132 – 2021-2024 Conservation and Demand Management Framework

Housing Services Corporation (HSC) welcomes this opportunity to comment on the 2021-2024 Conservation and Demand Management Framework.

HSC is a non-profit organization committed to ensuring that Ontario residents have access to safe and affordable housing that improves their quality of life. We support this by focusing on the long-term health and sustainability of Ontario's social housing asset. Since 2002, we have worked with Ontario's 1,400+ social housing providers and 47 service managers to help them make the best use of their resources and manage their building portfolios more effectively and efficiently.

With over 265,000 household units, social housing makes up a significant portion of residential rental housing in Ontario. The majority of social housing buildings are over fifty years old, with newer stock typically over twenty years old. The buildings and systems are not only old, but can be in poor condition due to factors such as competition with other social services for funding, outmoded regulated rent schedules, and high utility costs. About half of social housing is electrically heated, often with inefficient baseboard technology, resulting in high utility bills, the bulk of which are paid directly by the housing providers. High utility costs negatively impact sector operating budgets and reduce housing providers' capacity to complete capital repairs and energy upgrades and provide healthy homes to those in need.

This sector actively participates in both commercial retrofit and low-income residential CDM programs. Such programs are essential in assisting social housing providers in lowering operating costs and providing comfortable homes for their resident communities.

HSC supports the August 22, 2020 submission by the Low Income Energy Network (LIEN) to ERO# 019-2132 – 2021-2024 Conservation and Demand Management Framework. We particularly emphasize the importance of LIEN's comments on:

- The need for a separate budget and target for low-income customers and for low-income programs to maintain an augmented funding envelope for minor repairs. We add that these points should extend to multi-family buildings including those with projects under commercial retrofit programs.
- Having a primary focus on deep measures for low-income customers. Such measures should extend to both housing providers and tenants in single and multi-family buildings.

We further add the following comments on behalf of Ontario social housing, based on input from advisory groups and stakeholders from across the sector.

1. **Pursue a Whole Building approach across building types:** Efforts have been made to integrate gas DSM and electricity CDM programs for single family dwellings and to extend the Home Assistance Program into multi-family buildings that are participating in gas retrofit programs. Further integration is needed, particularly for multi-family buildings, in order to maximize energy savings opportunities, reduce application workloads for housing providers, and reflect the reality of integrated gas/electricity building systems.
2. **Pursue deep, sustained energy consumption savings:** social housing operates 24/7 with relatively little change in demand throughout each day. Programs for single and multi-family residential buildings should focus on deep and sustained reductions in energy consumption by:
 - a. Targeting energy consumption, more than peak demand, regardless of whether the housing operator participates in a residential or commercial incentive program;
 - b. Supporting an extensive suite of measures as noted by LIEN and tailoring measures and programs to building types and customer needs; and
 - c. Complimenting measures with new, and in some cases expanded, support for staff training, tenant engagement, re-/retro-commissioning, benchmarking, audits (a beneficial program that should be kept), and technical support services to identify a broad range of opportunities and to assist customers during and after implementation.
3. **Integrate Non-Energy Benefits into program cost-effectiveness tests:** programs for single and multi-family social housing have benefits beyond just energy savings and can have significant positive social, economic, and environmental impacts on these customers and the community. It is crucial that non-energy benefits be accounted for in programs for social housing.
4. **Minimize lost opportunities when conducting energy efficiency projects:** social housing providers identified that utility incentive program timelines are often out of sync with real-life project timelines, constructions cycles, and municipal council approvals. The Framework and programs must take these timelines and cycles into account to avoid lost opportunities.
5. **Ensure continuity and clear transition between CDM Frameworks and programs:** customers need sufficient lead-time and clear communication to prepare for the transition to the 2021-2024 Framework and any related program changes. Extensive outreach to customer groups including organizations such as HSC is required ahead of the transition. Adequate time is needed for projects started under current programs to close out and for customers to understand and adopt any new programs and application processes coming their way.

Please contact me at (416) 594-9325 ext. 308 or mparry@hscorp.ca to discuss this submission.

Sincerely,



Myfanwy Parry
Manager, Energy Services