

Dear Minister Cliff Cullen,

February 2, 2023

On behalf of the Board of Sustainable Building Manitoba (SBM) and our industry members, please accept our congratulations on your appointment as Minister of Finance.

We are writing to you regarding building codes and the decision our government faces in selecting the tiers to be adopted. Although Manitoba's building codes are not directly in your portfolio, there are major implications stemming from this decision impacting Manitoba Hydro in particular.

Many across the sector, including SBM, applauded when your government committed to the adoption of the 2020 National Model Building Codes in October 2022. For the first time, these codes contain tiers to represent ever increasing levels of energy efficiency for new buildings. There are 5 Tiers in the National Building Codes (NBC) for residential buildings and 4 Tiers in the National Energy Building Codes (NECB) that address commercial buildings

The highest tiers represent buildings with the highest degree of energy efficiency and the lowest total cost of ownership. SBM would love to see all new buildings meet those standards. However, we recognize there are many practical factors that determine what is possible in the short term. After conducting 15 semi-structured interviews, hosting several group discussions and soliciting feedback via email with stakeholders from all corners of the sector, we have produced a recommendation we know to be achievable by the Manitoba workforce and that represents the best interests of all Manitobans.

It is with confidence that SBM recommends Manitoba adopt Tier 3 for Part 9.36 of the NBC and Tier 1 advancing to Tier 2 in 2024 for the NECB. Various players across the sector have indicated that this is a realistic target for industry to achieve. For both residential and commercial, there are many buildings in the province currently being built at these levels. Therefore adopting a lower Tier than we recommend would represent a step backwards.

Along with this letter we have sent you our report that provides background and context for our recommendations. We welcome the opportunity to set up a meeting to discuss this important issue in more detail. Please feel free to contact our Executive Director, Laura Tyler, via email (ed@sustainablebuildingmanitoba.ca) or at 204-995-5255 to set up a suitable date and time.

As the Minister responsible for Manitoba's power utility, we hope you recognize the importance of mitigating future loads on the grid through energy efficient buildings and that you will work with Minister Jon Reyes to adopt our recommendations. Adopting building codes at the lower tiers will result in significantly higher demand for power, and jeopardize Manitoba Hydro's ability to deliver cheap energy.

Manitoba needs a clear path to rapid adoption of the higher Tiers for energy efficiency in the 2020 National Model Building Codes to set our province up for success. Doing otherwise exposes Manitobans to competitive, economic, financial and environmental risks for decades to come. Conservation after all, is the cheapest form of energy.

Thank you for your time and consideration,

A handwritten signature in black ink, appearing to read "Cindy Choy". The signature is fluid and cursive, with the first name "Cindy" written in a larger, more prominent script than the last name "Choy".

Cindy Choy
Board Chair - Sustainable Building Manitoba

ABOUT US:

Sustainable Building Manitoba (SBM) is an industry member-based organization that works to educate, promote and advocate for sustainable design and building. We recognize the role our built environment has in increasing or reducing greenhouse gas emissions and are working to address this through our advocacy and outreach activities. Our organization has participated in the expert advisory panels for your government's Made-in-Manitoba Green Plan and the recent Energy Framework consultations.

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Deputy Minister Richard Groen