



SOLAR

ALBERTA

Energy Code Report Feedback

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February 27, 2024

Capital Cost Impacts Are Overstated

Executive Summary:

“Although energy efficient buildings may be more cost effective over the long-term, they require a higher initial capital cost.” (p. 2)

However:

Table A3-1 shows that the capital cost increase estimates are 1-2% for Tier 3 (see Attachment 4).

City-Led Green Development Is Overstated

The report misrepresents community development in Blatchford:

1. A natural gas peaker is embedded in the geothermal plant
2. Another development phase (in planning) likely will not be renewable
3. A number of homes already have natural gas for appliances
4. Most buildings are not being built in a solar-ready way

More information needed about:

- Claims that the City is requiring higher efficiency in City-led developments and in land-sale agreements

Further Delays and Inaction on Emissions Neutral Buildings

Concerns:

- Report was originally expected last fall
- After an initial delay of 4 months, substantive suggestions are now being put off even further - to Q2, 2024

Additional Comments and Concerns

- CEIP expansion to new homes is needed for solar specifically
- The report underestimates the cost of natural gas
 - Does not consider carbon pricing
- ENBIAG summary misrepresents member feedback
 - No mention of some participants' repeatedly expressed desire for enhanced regulations