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May 5, 2025

Re: Agenda item 6.1.1, Energy Regulation Options for Building Standards

To the Standing Policy Committee on Planning, Development, and Community Services:

Thank you for the opportunity to submit comments. **The Saskatchewan Environmental Society (SES) is pleased to support Administration's recommendation**:

> *That the Standing Policy Committee on Planning Development and Community Services recommend to City Council that:*
>
> 1. *Option 1 - Maintain alignment with LEC Plan – Regulate to Tier 2, be approved, and*
> 2. *That City Solicitors be requested to prepare the necessary amendments to Bylaw No. 9958, Building Bylaw, 2024.*

The City of Saskatoon is facing this decision due to the Government of Saskatchewan's recent decision to backtrack on their commitment to make buildings more energy efficient under the National Building Code of Canada. Out of five energy efficiency performance tiers designed to move us towards achieving net-zero building standards, Saskatchewan had adopted Tier 2 as the required minimum standard for new low-rise residential buildings on January 1, 2024, with plans to progress to Tier 3 in 2026. Instead, in an unexpected weakening, the provincial government reverted to the lowest efficiency standard – Tier 1.

Tier 2 homes are designed to be more energy efficient by incorporating options such as increased insulation, more comprehensive air sealing, more efficient HVAC systems, or higher-performance windows and doors. These components help prevent heat loss and gain, further enhancing energy efficiency. In contrast, Tier 1 homes are less resilient to extreme heat and cold, and more susceptible to poor air quality from forest fire smoke or pollution. Improved energy efficiency in buildings decreases the energy needed to heat and cool, reduces greenhouse gas emissions, improves indoor air quality, and makes our homes more comfortable year-round. That's a win-win-win.

In choosing to maintain alignment with the Low Emissions Community (LEC) Plan and regulate to Tier 2, the City of Saskatoon will showcase its environmental leadership and maintain its positive momentum towards becoming a net-zero greenhouse gas emissions city by 2050. Moreover, we know that all homebuilders in Saskatoon are capable and ready to build above Tier 1. Homebuilders in Saskatchewan have already been meeting Tier 2 standards for over a year. Notably, Saskatchewan

recently boasted it ranked first among Canadian provinces for record-setting housing starts in 2024,[1] which was the year that Tier 2 became the provincial standard.

The importance of maintaining Tier 2 energy efficiency standards is also supported by the realities of how our climate is changing. Last year, Saskatoon experienced 19 very hot days above 30°C,[2] and climate modelling predicts this number will only get higher through the 21st Century. Building more energy efficient homes reduces cooling loads and reduces strain on the grid on hot days. Building to Tier 2 also offers better climate preparedness, as well as the major benefits of reducing greenhouse gas emissions through energy efficiency measures. We know that the City of Saskatoon is working to address mitigation and adaptation through its Climate Action Plan. Building more sustainable, climate resilient homes can help do just that.

Regarding affordability, in 2022, BILD Alberta estimated that the financial implications of building a home to Tier 2 would only increase construction costs an estimated 0.35% to 1.05% (or $1,100 to $3,300) for a 2,000 ft^2 home.[3] This will be offset ever year by lower utilities bills for homeowners. Based on the work of Efficiency Canada,[4] we estimate savings of at least $300 annually for homeowners in Saskatoon. Improved energy efficiency can also lead to increased home value, commanding a higher price when a house is sold.

Another benefit of continuing to build to Tier 2 is that it reduces the likelihood for homeowners to be burdened by expensive retrofits in the future. Investing in energy efficient homes is a long-term investment that will save money over the lifetime of the property while at the same time contributing to a more sustainable future. As well, the energy efficient building sector is creating jobs in design, construction, and installation, contributing to economic growth.

By embracing energy efficient building practices (e.g., regulating to Tier 2 of the National Building Code), the City of Saskatoon can meaningfully contribute to the creation of a more sustainable, affordable, and resilient future for all. Thank you for considering our views.

Sincerely,

Bob Halliday
SES Vice President

Allyson Brady
SES Executive Director

Peter Prebble
SES Board Member

Megan Van Buskirk
SES Director of Policy & Communication

[1] Government of Saskatchewan. (2025, March 18). *Saskatchewan's building construction and housing starts leads the Nation* [Press release]. https://www.saskatchewan.ca/government/news-and-media/2025/march/18/saskatchewans-building-construction-and-housing-starts-lead-the-nation

[2] *Number of days within a temperature ≥ 30°C: Monthly data for Saskatoon*. https://saskatoon.weatherstats.ca/charts/count_temp_30-monthly.html

[3] BILD Alberta. (2022). *Tiered energy code roadmap*. https://bildalberta.ca/wp-content/uploads/2022/09/BILD-Alberta-Tiered-Code-Roadmap-August-2022.pdf

[4] Efficiency Canada. (2025, February 19). *Saskatchewan's building code backtrack will burden homeowners with higher costs* [Press release]. https://www.efficiencycanada.org/saskatchewans-building-code