



Canadian Institute of Plumbing & Heating
L'Institut canadien de plomberie et de chauffage

A National Voice with Regional Roots | Une histoire régionale, une voix

September 16, 2022

Lisa Westerhoff
Principal
Integral Group
Suite 180, 200 Granville Street
Vancouver, BC V6C 1S4

SUBJECT: CleanBC Highest Efficiency Equipment Standards – Regulatory Stakeholder Workshop

Dear Lisa:

The Canadian Institute of Plumbing & Heating (CIPH) appreciates the opportunity to provide comments on the CleanBC Highest Efficiency Equipment Standards – Regulatory Stakeholder Workshop.

CIPH's concern continues to be product availability, additionally, that enforcement is put on distribution through Point-of-Sale (POS) enforcement. "Systems" are easy to enforce at POS, but parts of the systems need Point-of-Installation (POI) enforcement. For example: Heat Pump/Furnace systems. How do you replace a furnace that is part of the system when it is less than 100% efficient and restricted at POS?

We suggest that it is not possible to retrofit a forced air heating system with a heat pump, furnace and A-coil, when one component, the furnace, will likely be under 100% efficient and restricted from sale. Will the homeowner be required to replace the entire system? How can the province mitigate this situation? Cold climate installations will also have additional technical issues of installation and operation as well as equipment supply or adequacy.

Our suggestion for Point-of-Installation standards (POI) - Complex Systems is to have enforcement at the installation level for all. This would put the burden on the installer/seller of the equipment and the end user. We suggest that a "permit before sale" for gas and electric equipment would trigger an inspection and would better control the installation by qualified persons. Permits are very common at the commercial level already, so this will have limited impact on the commercial sector. Permits for replacement of residential equipment is very limited, possibly only 10-20%. This is due to permit cost avoidance by the contractor or the homeowner for cost savings. This helps promote the installation of equipment by unqualified persons and harms the integrity of the industry. Permits could only be purchased by qualified contractors or by homeowners.

The municipalities expressed concern that the burden of enforcement costs will land on them. They pushed for enforcement at POS, but bundled system certification is an expensive burden on industry as each bundle must be certified. An example is where manufacturers partner together for a certified bundle. Each SKU partner must be certified. For example, 3 boiler SKU's and 3 blower SKU's will trigger 9 certification tests and the cost will be extraordinary for industry to carry the burden. Electronic energy modelling would be a better way to field certify systems. The province should consider creating software that the installation industry can use to energy model equipment bundles. This can tie to the permit application and process.

Our concern is the administration cost of POS is the burden of distribution. High staff turnover at sales counter positions will bring errors and will require significant training. Possible controls can be put in place via computer sales systems, but this adds cost to distribution. POS enforcement also puts the burden and potential penalty on distribution. Significant training plus computer system upgrades to control the sale would be necessary.

Sincerely,
Canadian Institute of Plumbing & Heating



Dave Hughes
Technical Advisor, Codes and Standards

CIPH

Founded in Montreal in 1933, the CIPH is a not-for-profit trade association that is committed to providing members with the tools for success in today's competitive environment. More than 283 companies are members of this influential Canadian industry association. They are the manufacturers, wholesaler distributors, master distributors, manufacturers' agents, and allied companies who manufacture and distribute plumbing, heating, hydronic, industrial PVF, and waterworks, and other mechanical products. CIPH wholesalers operate more than 700 warehouses and showrooms across Canada. Total industry sales exceed \$9 billion annually and CIPH members have more than 20,000 employees from coast to coast.