



September 24, 2022

Mr. Andrew Howse
Ministry of Energy, Northern Development and Mines, Conservation and Renewable Energy Division
77 Grenville Street
5th Floor
Toronto, ON, M7A 2C1
Canada

[Electronically Submitted to Environment Registry of Ontario Portal]

Re: Proposal to Amend O.Reg. 509/18 Under the Electricity Act, 1998 (“Efficiency Regulation”)

Dear Mr. Howse:

On behalf of Bradford White Corporation (BWC), thank you for the opportunity to comment on the province’s proposal to amend O.Reg. 509/18. BWC is a leading, full-line, manufacturer of residential, commercial, and industrial products for water heating, space heating, combination heating, and water storage. A significant number of Ontario’s homeowners, families, and job providers rely on our products for their hot water and space heating needs.

BWC appreciates the Ontario Ministry of Energy’s efforts to harmonize provincial regulations for our products with those already in force in other jurisdictions. We have long been proponents of regulatory consistency across Canada, whether it be the result of agreements between provinces, or deference to Canadian federal regulations established by Natural Resources Canada (NRCan). We support the ministry’s proposal to update the scope for commercial electric storage water heaters to better align with NRCan and the test method to include rolling incorporation with the United States Department of Energy (DOE).

While we applaud these efforts, we do have concerns about other details of the proposal that are provided by the ministry and how they will align with ongoing regulatory actions being considered in other jurisdictions. For instance, Ontario proposes changes to the scope of commercial gas-fired water heaters in an effort to harmonize with other jurisdictions.

While the proposed amendment is unclear as to what other jurisdictions the ministry is making efforts to harmonize with, BWC would like to share our comments made to NRCan on June 10, 2022, in response to their publication of Amendment 17 to the Energy Efficiency Regulations in Canada Gazette, Part I. In this correspondence, we suggested NRCan change the volume term in standby loss and uniform energy factor formulas for these products. We believe the terms should be V_r , rated volume, instead of V_s , measured volume. This would better align with DOE regulations, which we believe is NRCan’s, and now Ontario’s, goal.

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Additionally, for commercial gas-fired storage models with capacities above 140 gallons (U.S.), we recommended that NRCan set one standard of a minimum 80% Thermal Efficiency to align with DOE requirements. In the event that NRCan is unwilling to adopt a single standard for these products, BWC recommended that they set separate requirements for new construction and replacement applications, to be consistent with the standards NRCan set in Amendment 15 for commercial gas-fired storage models with capacities under 140 gallons. For your reference, we have submitted our comments to NRCan along with this communication, in addition to corresponding exhibits, which include the aforementioned formulas.

We urge the ministry to continue working closely with NRCan to ensure that Ontario's proposed amendment aligns with the eventual publication of Amendment 17 in Canada Gazette, Part II. Doing so will help to reduce regulatory confusion among manufacturers and building owners throughout Ontario.

Thank you for the opportunity to comment on the proposed amendments to O.Reg. 509/18 Efficiency Regulation and for your desire to ensure provincial regulations are consistent with those in other jurisdictions. Please let me know if you have any questions on our feedback.

Respectfully Submitted,

Bradford White Corporation

Eric Truskoski
Senior Director of Government and Regulatory Affairs

Cc: T. Gervais; B. Wolfer;

Attachment: Bradford White Corporation comments to NRCan on Amendment 17 – Canada Gazette, Part I, June 10, 2022.

Attachment: Recommended UEF and Standby Loss Formulas for Consideration

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