

**Manitoba Eco-Network Comments on Efficiency Manitoba's 2020/23
Efficiency Plan**

The Manitoba Eco-Network (MbEN) appreciates this opportunity to participate in the Public Utilities Board's review of Efficiency Manitoba's 2020/23 Efficiency Plan. Since 1988, MbEN has promoted positive environmental action by supporting people and groups in our community. MbEN is currently transitioning our programming to focus more on policy advocacy, engagement in consultation processes and developing capacity building tools that benefit the environmental non-profit sector and our member groups. Although MbEN was very interested in participating in this proceeding as an intervenor, a number of factors including uncertainties in relation to funding, the need for technical assistance, and the short timeframe within which to review Efficiency Manitoba's Plan limited our capacity to contribute. However, MbEN was pleased that the PUB has created an alternative opportunity for interested parties to contribute to the review of Efficiency Manitoba's Plan.

MbEN commends Efficiency Manitoba on the production of their first Efficiency Plan. We see this as a positive indication that Manitoba is moving towards a future with more programs and tools, albeit less money, to support climate change mitigation efforts. While we were unable to provide detailed technical commentary on the 2020/23 Efficiency Plan, MbEN felt it was important to provide the PUB with our broader environmental perspective and to support the position of other intervenors and presenters with valuable insights such as the Consumers Coalition, the Green Action Centre, the Manitoba Energy Justice Coalition, the Council of Canadians, and Sustainable Building Manitoba.

MbEN feels that Efficiency Manitoba has the potential to play an important role in Manitoba's fight against climate change. As Section 4(1)(a) of *The Efficiency Manitoba Act* states, the mandate of Efficiency Manitoba includes the implementation and support of demand-side management initiatives to meet the savings targets and *achieve reductions in greenhouse gas emissions*. This mandate, along with the Province's inclusion of Efficiency Manitoba in its Climate and Green Plan Discussion Paper to address climate change mitigation means it is critically important to consider the Plan's environmental impacts and potential

impact on the reduction of greenhouse gas emissions. Time is running out to make meaningful progress on climate change in Manitoba and there is a need to use all of the opportunities and tools that are available to address the climate crisis. As stated in its vision, mission and values, the PUB is independent, impartial and objective, transparent, accessible, supportive of a respectful work environment and above all focuses on the public interest. Moving forward, MbEN hopes to better engage with Efficiency Manitoba and contribute to the development of programs that focus more on environmental outcomes.

Figure 6 and Figure 7 from the National Energy Board, included below, shows the size and important of petroleum products (gasoline, diesel) and the transportation sector of energy use in Manitoba.

The National Energy Board also points out that GHG emissions are rising in Manitoba and that more work needs to be done to reduce per capita energy consumption.

Figure 6: End-Use Demand by Sector (2016)

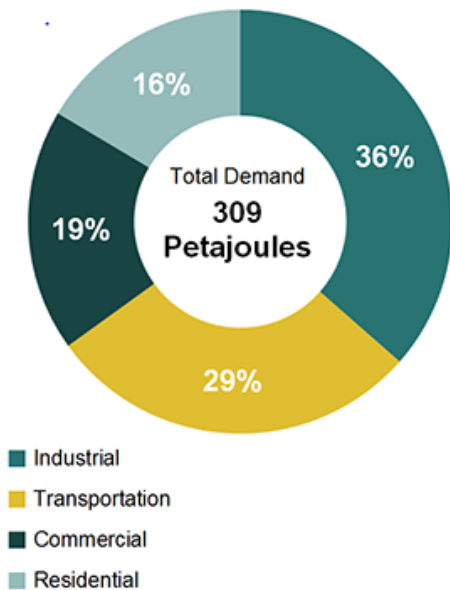
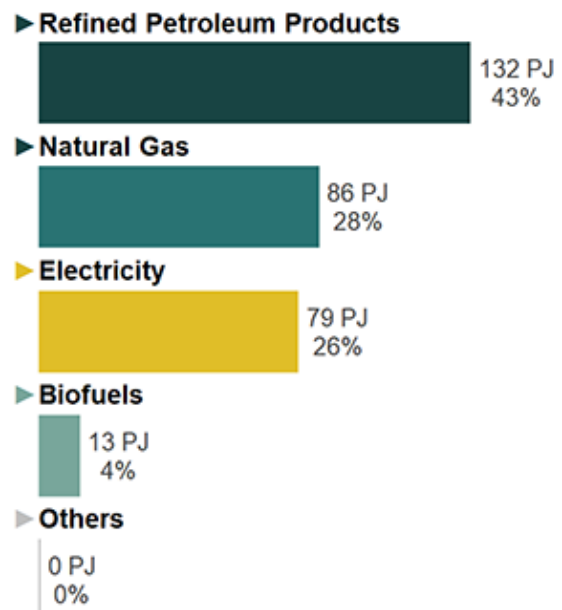


Figure 7: End-Use Demand by Fuel (2016)



GHG Emissions

- Manitoba's GHG emissions in 2016 were 20.9 megatonnes (MT) of carbon dioxide equivalent (CO₂e). ¹ Manitoba's emissions have increased 14% since 1990.

Electricity

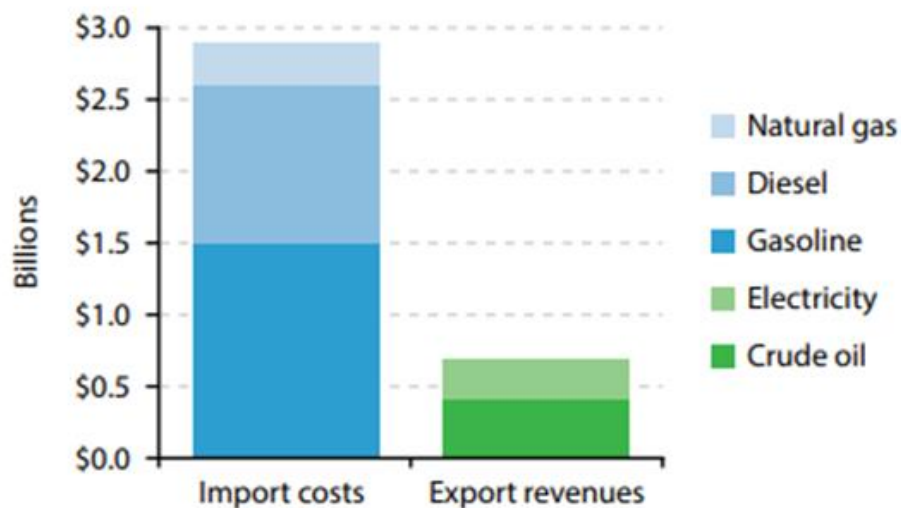
- In 2016, annual electricity consumption per capita in Manitoba was 17.2 megawatt hours (MW.h). Manitoba ranked 6th in Canada for per capita electricity consumption and consumed 16% more than the national average.

Figure 1D and Figure 6A, also shown below, are from Manitoba's Five Year Report on Energy (2009 to 2014).

Figure 1D depicts energy trade balance and the opportunities to reduce this balance by further electrifying our economy.

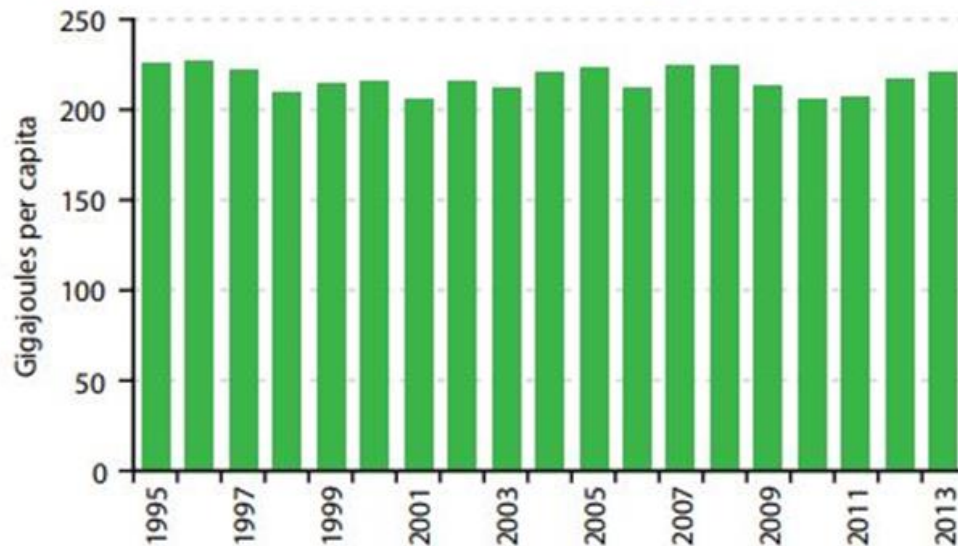
Figure 6A reiterates the need to be more proactive in reducing energy consumption in Manitoba.

Figure 1D. Manitoba's Energy Balance in Dollars*



Manitoba’s population is growing steadily, and this growth is expected to increase our overall energy demand. We can offset some of this growth in demand by becoming more efficient in our use of energy, however Figure 6A shows that our overall energy consumption has remained steady over time. More must be done to continue Manitoba’s trajectory as a leading jurisdiction for energy efficiency and demand side management programs.

Figure 6A. Manitoba’s Overall Energy Consumption



Scope of Review:

Although MbEN appreciates the opportunity to participate in the PUB’s review of Efficiency Manitoba’s first Plan, we were disappointed in the limited scope of this hearing. It was particularly troubling that consideration of Manitoba’s Climate and Green Plan, the Provincial Energy Strategy, electric vehicles and other related policy and regulatory elements were excluded from this review. MbEN feels that the operations of Efficiency Manitoba and its proposed Plans are part of the “comprehensive framework of programs, policies and measures [...] to reduce greenhouse gas emissions and address the effects of climate change” (s. 2(1)(a)) *The Climate and Green Plan Act* requires the Province to develop. Therefore, a broader consideration by the Board of the regulatory and policy context within which Efficiency Manitoba’s 2020/23 Plan will operate would have been appropriate and helpful to assist with the identification of regulatory and programing gaps. There are limited venues for the examination and discussion of environmental plans, policies and regulatory requirements in Manitoba and there needs to be more opportunity for this type of discourse in order to improve the participation of environmental organizations and allow for more discussion of Manitoba’s environmental protection and climate change mitigation measures.

MbEN supports the intervenors and other presenters who have identified issues that should have been considered within the scope of this hearing. In particular, we support the Green Action Centre's position that the electrification of transportation (i.e. electric vehicles) should have been included within the scope of this review. There has been a mass movement towards electrification around the world and Manitoba is particularly well positioned to become a leader due to the abundance of hydroelectricity. A consideration of the broader context within which specific electrification programs operate allows for more creative solutions to be developed. For example, the integration of electrification of transportation with buildings and houses (such as the installation of in-home vehicle chargers) has the potential for deeper and more dramatic energy savings.

MbEN would like to see a broader array of policy goals and targets for fuel switching considered during this proceeding. In the context of green heat, for example, there are real long-term savings to be gained by switching from fossil fuel heat, such as natural gas or heating oil systems, to green heat options. Transitioning to green heat can create new markets and new opportunities. These systems generate renewable heat energy, reduce carbon emissions, generate local jobs and reduce dependence upon imported fossil fuel. Local and district heating options that incorporate these choices can have a genuine impact on reducing emissions. MbEN supports the position of the Council of Canadians in their discussion of the need for transition away from fossil fuels and encourages the PUB to consider their recommendations.

Consideration of Climate and Environmental Impacts:

Although MbEN views Efficiency Manitoba's Plan as a positive step forward in the transition towards a more sustainable society, there is a need for more consideration of environmental impacts and stronger energy savings targets. In light of the current climate crisis, there is a need for more innovative and aggressive measures from regulators and decision-makers to ensure the necessary environmental outcomes are achieved. This includes consideration of the savings targets Efficiency Manitoba has been mandated by legislation to meet. Although the current targets are not unreasonable, MbEN would have liked to see stronger

savings targets that better support achievement of international climate targets such as the Paris agreement and Net Zero by 2050.

“Globally, the economy has been getting more energy efficient at a rate of 1.8 per cent per year, but this is far from sufficient to meet climate targets and these gains are more than cancelled out by a global GDP growth rate that has averaged 2.9 per cent from 2000 to 2017. The International Energy Agency has called for efforts to increase that rate of improvement to 2.6 per cent a year in order to meet the Paris 2030 targets. The IPCC’s special report on 1.5 C indicated that annual investments in low-carbon technologies and energy efficiency should be increased by a factor of six relative to levels in 2015.” (Zeroing in on Emissions: Canada’s Clean Power Pathways – A review, David Suzuki Foundation, 2019)

MbEN feels there is a need for better linkage between the operations of Efficiency Manitoba and the Provincial Climate Strategy.

MbEN commends Efficiency Manitoba on its projected GHG savings, “equivalent to removing over 5,000 cars per year from within Manitoba”. However, there is a need for more ambitious GHG savings that better balance the market forces contributing to GHG increases, such as the 12,000 new vehicles registered in Manitoba every year.

MbEN also commends Efficiency Manitoba on its commitment to invest in emerging technologies. This has been an area that has not been adequately supported by Manitoba Hydro’s past programming and has great potential in terms of the development of innovative approaches that support the reduction of climate and environmental impacts.

Participation and Partnerships:

MbEN appreciates Efficiency Manitoba’s commitments to ongoing stakeholder and public engagement. We were pleased to see Efficiency Manitoba engaged with many qualified stakeholders in the development of the 2020/23 Plan through the Energy Efficiency Advisory Group, including several of our member organizations. Efficiency Manitoba’s proposed activities in terms of ongoing

stakeholder engagement seem promising, although MbEN would like to see more engagement with Manitoba's environmental organizations to ensure more focus on climate and environmental impacts in the implementation and evaluation of the Plan.

In terms of Efficiency Manitoba's engagement with the public, however, there appears to be significant room for improvement. In particular, MbEN is very supportive of the recommendations made by the Consumers Coalition in terms of potential improvements to the Stakeholder Engagement Model and ongoing engagement with members of the public. The evidence provided by Dr. Patricia Fitzpatrick on the Coalition's behalf was compelling and she provided excellent recommendations for potential improvements in this area. To summarize Dr. Fitzpatrick's presentation:

- There is a need to distinguish between stakeholder engagement and engagement with the public in order to ensure Efficiency Manitoba creates meaningful opportunity for all Manitobans to participate.
- It would be helpful to clarify the role and responsibilities of the Energy Efficiency Advisory Group members, especially in terms of their engagement with members of their specific constituencies and the public in general.
- There is room for improvement in terms of developing additional public participation opportunities prior to the implementation of the Plan, as well as during the implementation phase and future evaluations.
- We support Dr. Fitzpatrick's suggestions for the development of outreach and education programs and the need for additional mechanisms for the public to engage directly with Efficiency Manitoba and more targeted engagement with Manitoba's youth.

Beyond their potential as consumers of the future, Manitoba's youth will also face the environmental consequences of the regulatory decisions made today. There is a need for new and innovative ideas in the development of climate change mitigation measures and Manitoba's youth have already demonstrated that they are passionate and ready to be better engaged in Manitoba's governance processes, including the development of plans and policies.

MbEN was pleased to see commitments by Efficiency Manitoba to strengthen partnerships with community organizations, Indigenous organizations, and educational institutions in order to support educational activities, enhance participation opportunities and assist with the delivery of programming. We would like to see these opportunities to go further and better include partner organizations in the development of the programs they are tasked with delivering. Efficiency Manitoba should consider forming partnerships with a broader range of organizations to increase the scope of proposed programs. For example, organizations such as the Neighbourhood Renewal Corporations could make a valuable contribution to programs aimed at retrofits for low-income housing.

MbEN also sees a need for partnerships with organizations that could assist with the development and provision of programs focused on educating and improving access to programming for new Canadians as this segment of Manitoba's population is growing. The development and delivery of programs that will adequately equip new Canadians with the information and tools they need to effectively access energy efficiency programming will need to be addressed.

MbEN would also recommend a broader approach to community energy planning. Community Energy Plans are tools that can support communities' efforts to better understand their local energy use and costs, as well as consider future growth needs, identify opportunities to conserve and improve energy efficiency, reduce GHG emissions in the community, and help drive local economic development. Community Energy Plans take an integrated approach to energy planning by aligning energy, infrastructure and land use planning and better equip communities to achieve positive environmental outcomes. MbEN is very supportive of proposed community energy planning activities in Indigenous communities but recommends that such planning activities also include municipalities. As discussed by Dr. Timothy Clark on behalf of the Assembly of Manitoba Chiefs, more details from Efficiency Manitoba will be required in terms of their proposed approach to "community energy efficiency planning" as it appears that such planning processes may be narrowly focused on energy efficiency plans. MbEN recommends an approach that aligns with the more comprehensive community energy planning approaches that have been utilized in other jurisdictions in Canada.

Conclusion:

Overall, MbEN feels Efficiency Manitoba's 2020/23 Plan represents a positive step forward. We were pleased to see commitments to ongoing stakeholder and public engagement, projected environmental benefits such as water savings, waste reduction and GHG savings, and investment in the development of new technologies. The proposed plan has the potential to support the work of community organizations, foster environmental leadership and support the building of relationships that support collaborative environmental action.

MbEN would strongly recommend the PUB consider the submissions of the intervenors and other presenters such as the Consumers Coalition, the Green Action Centre and the Council of Canadians that have provided more technical commentary in terms of projected savings targets, electrification of transportation and public engagement. MbEN also suggests the PUB make recommendations in support of:

- more consideration of environmental impacts and benefits;
- the establishment of stronger energy savings targets and climate commitments;
- broader stakeholder engagement and more public participation opportunities in the development and delivery of programming;
- more development of and funding for targeted programming such as low-income retrofits, programs aimed at new Canadians, and community energy planning.

MbEN also urges the PUB to suggest broader interpretation of the regulatory framework to allow for better consideration of environmental and climate impacts. There is a need for a comprehensive regulatory review that better considers Manitoba's regulatory framework as a whole and enables environmental organizations like ours to advocate for positive change. The PUB is well positioned to play an influential role in Manitoba's transition towards a more sustainable society and we would urge you to use this influence for the betterment of all Manitobans.

MbEN appreciates this opportunity to present to the PUB and provide a broader environmental perspective. We look forward to and welcome future opportunities to engage with the PUB and Efficiency Manitoba in the implementation and evaluation of the 2020/23 Efficiency Plan and if given adequate time and resources, facilitate participation of our member organizations.

January 24, 2020