



CleanBC Review

Submission from Community
Energy Association

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Community Energy Association (CEA)

Introduction: A Trusted Partner in Local Climate and Energy Action

As British Columbia seeks to scale implementation of its climate commitments, trusted delivery partners are essential to bridging ambition with impact on the ground.

The Community Energy Association (CEA) is pleased to contribute this submission to the CleanBC Review. A registered charity that emerged from a collaboration between the Province and the Union of BC Municipalities in the 1990s, CEA has grown into a trusted implementation partner dedicated to advancing climate and energy action in local and Indigenous communities.

Today, CEA is an independent charitable non-profit with a team of over 50 staff working across all regions of BC. We support community and corporate energy planning, having facilitated more than 100 community energy and emissions plans and 44 corporate energy plans. Through 16 regional and topic-based peer networks, we engage thousands of staff, elected officials, and community partners. We also deliver on-the-ground implementation of EV charging networks, retrofit programs, and industry capacity-building initiatives.

Our work provides a unique systems-level perspective across geographies, sectors, and CleanBC programming. Through this lens, we offer trusted insights into implementation realities, regional needs, and emerging opportunities.

This submission presents strategic recommendations based on CEA's delivery experience and formal engagement with the Province through the Climate Aligned Energy Framework (2023). We also draw from two additional submissions facilitated by CEA: one on behalf of the Northern BC Climate Action Network and another representing the voices of our Local Government Peer Networks.

Key Messages and Highlights

1. **Establish a Provincial Energy Strategy:** Communities, industry and utilities need a shared, coordinated energy roadmap. It should clarify the roles of electricity, renewable gases, efficiency, and system planning.
2. **Stay the Course on Ambitious Policy:** Policies like the Zero Carbon Step Code and Zero-Emission Vehicle Act are foundational and should not be weakened. Long-term policy certainty is critical to local action, market transformation, and workforce readiness.
3. **Support Local Governments with Stable, Long-Term Funding:** Programs like LGCAP are essential for enabling climate action at the community level. Predictable, multi-year funding is foundational for staffing, planning, and implementation.

4. **Invest in Workforce and Retrofit Delivery Capacity:** Addressing workforce gaps, especially in rural and Indigenous communities, is essential to scale retrofits, decarbonize buildings, and support local economic development.
5. **Integrate Climate Mitigation and Adaptation:** CleanBC must embed Low Carbon Resilience (LCR) across all programs to unlock co-benefits like health, affordability, and infrastructure resilience.
6. **Ensure Regional Flexibility and Equity:** Rural, remote, and Indigenous communities face unique barriers. Programs must be flexible, regionally tailored, and support equitable access to resources and technology.
7. **Simplify and Coordinate Program Delivery:** Overly complex and fragmented programs create barriers for communities. CleanBC should centralize information and streamline access to incentives and funding.
8. **Lead on Public Communication and Data Transparency:** The Province must counter misinformation with consistent, values-based messaging and improve access to utility and program data to support local planning.
9. **Align Utilities and BCUC with CleanBC:** Conflicting messages from major utilities are confusing communities. The BCUC's mandate must evolve to support climate goals, and utilities must engage in coordinated, transparent planning.

Responses to CleanBC Review Questions

1. CleanBC Policies (Legislation, Regulation, Direction)

a. What is working well?

- The BC Energy Step Code (ESC) remains a gold standard for policy co-development. Its multi-year development process, collaborative and cross-sectoral stakeholder engagement, and phased implementation enabled communities, industry, and the workforce to prepare and deliver effectively. The approach equally balanced input from technical, local government, industry, communications and professional stakeholders through the design and facilitation of multiple working groups, who reported into the Energy Step Code Council (ESCC).
- The Zero-Emission Vehicle Act (ZEVA) provides needed certainty and momentum for transportation decarbonization.
- Regulations such as the natural gas cap and organics diversion mandates demonstrate leadership and signal a long-term shift.
- The Low Carbon Fuel Standard (LCFS) is viewed as a high-impact tool with local co-benefits and could be expanded.

b. What are the challenges or areas for improvement?

- The Zero Carbon Step Code (ZCSC), while conceptually strong, lacked the same collaborative and cross-sectoral rollout as the ESC. This has resulted in polarization and implementation confusion.

- There is still no comprehensive provincial energy strategy. This gap leaves utilities, municipalities, and industry without a shared direction.
- Fuel switching policies have been weakened or deprioritized, especially for single-family dwellings and rural communities.

c. What gaps exist, and how could they best be filled?

- Establish a provincial, long-term, integrated energy strategy with interim targets, 5-year planning cycles, and fuel-specific roles. Draw on models like the UK's Net Zero Strategy and Ontario's Energy for Generations. A clear energy strategy creates certainty and stability for:
 - Policy implementation
 - Market transformation and economic growth
 - Investment and innovation in the clean energy sector
 - A 'north star' for all Ministry, Public Sector Organization, utility, local government and industry plans and strategies
 - Utility coordination and collaboration
- Maintain and implement the Highest Efficiency Equipment Standard (HEES) as a critical next step in decarbonizing existing buildings. There is growing concern that HEES may be rolled back or weakened, which would undermine local government momentum, reduce emissions reductions potential, and stall progress on workforce transformation needed to support the retrofit economy.
- Expand CleanBC's building decarbonization framework to address embodied emissions. Current policy focuses primarily on operational energy. There is a critical opportunity to reduce lifecycle emissions by incorporating embodied carbon standards or guidance alongside the Energy and Zero Carbon Step Codes. This would align BC with leading jurisdictions and send a market signal to low-carbon material producers.

2. CleanBC Programs and Government Spending

a. What is working well?

- Programs such as LGCAP, CleanBC rebates, and the CleanBC Communities Fund have enabled meaningful local action.
- Incentives have catalyzed significant uptake in EV adoption and home energy retrofits, especially when designed with stability and clarity.

b. What are the challenges or areas for improvement?

- Some grant programs, such as the Active Transportation Infrastructure Grants Program, are burdensome, particularly for smaller communities and First Nations. Navigating application and reporting systems often exceeds internal capacity.
- Incentive design currently leaves gaps for middle-income households, renters, and those in rural areas.
- Program delivery is fragmented across BC Hydro, FortisBC, and CleanBC, creating inefficiencies and confusion.

c. What gaps exist, and how could they best be filled?

- Develop a coordinated "CleanBC Hub" that streamlines incentive access, simplifies application processes, and provides tailored guidance with a strong regional approach and is integrated with programs already in market (such as CEA's [Retrofit Assist](#)).
- Expand support for deep retrofits, workforce training, and equitable access to incentives across regions and demographics.

3. Alternative Funding Models

- PACE legislation: Enable municipalities to offer property-based financing for retrofits. (eg. Alberta and California)
- On-bill financing: Allow utilities to administer energy improvement loans repaid via energy bills. (e.g. Ontario on-bill pilots)
- Blended financing: Combine public and private capital to unlock market-scale investment. (e.g. New York Green Bank)
- Bulk purchasing and aggregation: Especially for heat pumps and EV infrastructure.

4. Role of Utilities and the BCUC

a. What is working well?

- Initial steps toward grid modernization are welcomed; integrating grid modernization, load management and solutions such as integrated battery storage and vehicle-to-grid technology into an overarching provincial energy strategy would accelerate innovation.

b. What are the challenges or areas for improvement?

- Local governments are consistently hearing mixed messages from BC's major utilities—BC Hydro and FortisBC—about the future of electrification, building decarbonization, and fuel supply. This leaves communities uncertain about how to plan, invest, and communicate with residents.
- The BC Utilities Commission (BCUC) is not currently positioned to mediate or resolve these conflicting signals. Its mandate is not clearly aligned with CleanBC objectives or a shared energy transition vision.
- There is no central, clearly defined pathway that utilities, ministries, regulators, and local governments can all align with. This contributes to confusion and delays in implementation at the local level.

c. What gaps exist, and how could they best be filled?

- Develop and legislate an integrated provincial energy strategy that provides a common roadmap for decarbonization and clearly defines roles for electricity, gas, and emerging fuels.
- Require joint planning and reporting between utilities that aligns with CleanBC targets.

- Update the BCUC’s mandate to explicitly support climate action, and ensure its oversight aligns with the Province’s long-term emissions reduction and energy resilience goals.
- Mandate transparent data-sharing between utilities and local governments to support energy planning, tracking, and public trust.
- Review and revise the Greenhouse Gas Reduction Regulation (Section 4) to allow electricity utilities to support fuel-switching programs without prioritizing export revenues over domestic decarbonization. Models from Ontario, California, and Massachusetts show how enabling policies can support beneficial electrification without rigid cost-effectiveness tests.

5. Enabling Conditions

- **Workforce:** There are acute shortages of retrofit contractors, energy advisors, and code-literate inspectors, especially in rural areas. Investments are needed to expand trades training and credentialing in underserved regions, including through partnerships with local colleges and training organizations. Training must align with evolving codes. Support for Indigenous-led initiatives ensures culturally relevant, place-based delivery.
- **Supply chains:** Northern and remote communities face delays and cost premiums for clean technologies. Expanding local market capacity through regional retrofit delivery agents—such as nonprofit implementers, retrofit coaches, and aggregators—can improve technology access and trust in programs.
- **Permitting:** EV charger and heat pump installations face inconsistent municipal approval processes. Local governments require more standardized, province-wide permitting guidance and staff training to streamline implementation.
- **Capital:** Upfront costs remain a barrier, particularly for lower-income households and small businesses. BC should pursue innovative financing tools—such as on-bill financing, blended capital models, and property-assessed clean energy (PACE) legislation—to improve affordability. Long-term market development funds should support locally tailored retrofit implementation.
- **Workforce coordination strategy:** The Province should lead a coordinated approach that connects workforce, housing, and climate goals, ensuring that skills training and retrofit delivery are aligned across regions.

6. Additional Barriers

- The absence of a provincial energy strategy is a barrier that has hindered effectiveness of CleanBC policies and programs and created:
 - A vacuum of direction and ambition for BC’s energy future causing uncertainty around the impacts, risks and benefits of energy related policy at the local government level
 - Misalignment between utilities – no common goalpost resulting in a jockeying for position and relevance in the energy system

- Siloed approach to energy planning – e.g. the Clean Power Action Plan - a good plan for the purposes of clarifying the capital plans and timelines for supply.
- Misinformation campaigns have eroded public trust in codes and climate actions.
- Policies and incentives change too frequently, creating uncertainty.
- Communities lack authority to move faster in some areas (e.g., energy disclosure, retrofit mandates).

7. Alignment with Other Provincial Priorities

CleanBC's success depends not only on reducing emissions, but also on how well it integrates with other pressing provincial goals, such as affordability, adapting to climate risks, economic competitiveness, public health, and energy security.

- **Affordability:** By reducing household energy costs through fuel switching and deep retrofits, CleanBC policies directly support cost-of-living improvements. This is especially true when paired with long-term certainty in rebate programs and accessible financing mechanisms.
- **Climate Adaptation:** Mitigation and adaptation efforts remain siloed in policy and funding, yet communities are seeking integrated, systems-based solutions that address both current risks and long-term emissions.
- **Health:** Building electrification improves indoor air quality and reduces respiratory illness, particularly in vulnerable populations. Clean transportation (including school bus electrification) also delivers significant public health benefits.
- **Economic development:** CleanBC should be framed as a major provincial economic opportunity. Shifting from imported fossil fuels to BC-based electricity boosts economic retention and resilience. Retrofit programs and electrification create high-quality jobs and support local businesses—especially when paired with workforce development.
- **Energy security:** Electrification of heating and transportation strengthens BC's energy sovereignty by reducing reliance on imported fuels. CleanBC can play a leading role in shaping a coordinated transition that improves both energy and economic resilience.
- **Equity and regional development:** Aligning CleanBC with broader provincial priorities also means recognizing the diverse needs of BC's communities. This includes providing tailored supports for Indigenous communities, renters, and rural residents, and enabling regionally appropriate implementation through flexible program design and delegated authority where appropriate.

8. Innovations from Other Jurisdictions

- **UK Net Zero Strategy:** Five-year carbon budgets, embedded equity goals, and public accountability.
- **Ontario's Integrated Energy Plan:** A credible, fuel-inclusive model that coordinates utilities with a planning horizon to 2050.

- **Ontario's Electricity DSM Plan:** Includes a provision for "Beneficial Electrification" programs, defined as "the use of electricity instead of other fuels to reduce overall energy use and emissions and subsequently reduce costs for high consumption activities such as home heating and cooling, regardless of fuel type."
- **Ontario's Cost-Effective Energy Pathways Study:** A comprehensive study to evaluate the pathways to decarbonize the province's energy system by 2025.
- **New Zealand's "right to cooling" approach:** Embedded in housing codes and retrofit incentives.
- **California's delegated authority model:** Empowers willing municipalities to lead on implementation.

9. Targets, Reporting and Accountability

a. What is working well?

- The 2050 target provides a clear long-term vision and signals ambition. While BC's legislated goal remains an 80% reduction below 2007 levels, the Province also committed to achieving net-zero emissions by 2050, providing a foundation for long-term planning and investment. The net-zero emissions target should be tied to a comprehensive Provincial energy strategy with a robust plan updated regularly.

b. What are the challenges or areas for improvement?

- The interim 2030 target is viewed by practitioners as unachievable without significant changes to current policy design, implementation pace, and investment levels. While these targets are important to maintain accountability, the growing gap between ambition and progress risks eroding public trust and local confidence.
- Accountability is weak: reporting is infrequent and hard to interpret.
- Communities lack data to track progress or show co-benefits.

c. What gaps exist, and how could they best be filled?

- Publish an annual CleanBC Report Card with progress by sector and region.
- Provide local governments with program participation and emissions data.

10. Additional Indicators

- Number and depth of retrofits by region
- Community-level participation in CleanBC programs
- Workforce development stats (# of new certifications)
- EV charger availability per capita
- Percentage of public buildings cooled with non-emitting systems
- Fuel switching metrics, especially in SFD and rental housing

Conclusion: Scaling CleanBC with Trusted Partners

CEA is proud to coordinate not just this submission but two others—on behalf of the cross-sectoral Northern BC Climate Action Network and CEA’s Local Government Peer Networks. Together, they reflect the breadth and depth of implementation experience across the province.

To succeed, CleanBC must move from setting direction to enabling scaled, equitable implementation. This requires clearer governance through a Provincial integrated energy strategy, sustained funding, more consistent data, and stronger provincial leadership on workforce and communications.

CEA is ready to support this next phase of delivery, and to work alongside the Province to translate ambition into lasting outcomes for BC’s communities.