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Date October 3, 2023 **Report No.** 2023-512
To Chair and Members
Committee of the Whole – Operations
From Inderjit Hans, P. Eng., PMP
Commissioner, Public Works Commission

1.0 Type of Report

Consent Item
Item For Consideration

2.0 Topic **Public Works Energy Management Policy Transition** **[Financial Impact: None]**

3.0 Recommendation

- A. THAT Report No. 2023-512 Public Works Energy Management Policy Transition BE RECEIVED; and
- B. THAT PUBLIC WORKS-013 Energy Management Policy BE REPEALED; and
- C. THAT the necessary by-law to amend By-law 70-2010, being a by-law to adopt various City of Brantford policies, BE PRESENTED to City Council for adoption.

4.0 Executive Summary

This Report outlines how the current scope, authority structure, and content of the Energy Management Policy (PUBLIC WORKS-013) are outdated and provides rationale for why the policy should be repealed. The Energy Management Policy has not been updated since June 2010 and the responsibility for reviewing this Policy was with the now defunct City's Energy

Conservation Committee. The issues identified with this Policy were initially identified by staff during a comprehensive review of the Public Works Commissions' Corporate Policies in September 2022 (Report No. 2022-552).¹ Staff from the Business Support and Sustainability Office and Engineering Services have since conducted a more in-depth review of this Policy to determine if any changes can be made to make the Policy useful for governing energy management practices across the Public Works Commission.

Staff recommend that the City's Corporate Energy Management Plan, Corporate Climate Change Action Plan, and future sustainability standards replace the authority structure and guidelines previously outlined in this Policy.

5.0 Purpose and Overview

The purpose of this report is to recommend the Energy Management Policy (PUBLIC WORKS-013) be repealed and that the City's Corporate Energy Management Plan, Corporate Climate Change Action Plan, and future sustainability standards replace the authority structure and guidelines outlined in the Policy.

6.0 Background

The Energy Management Policy was enacted in April 19, 2010 with the objectives to decrease the consumption of non-renewable resources, decrease greenhouse gas (GHG) emissions, and implement sustainable environmentally friendly management practices. Only departments under the Engineering and Operational Services Commission (what is now the Public Works Commission) were implicated by this Policy. The guidelines outlined in the Policy only provide general statements that the City shall reduce energy consumption, consider lifecycle energy costs, and integrate best energy management practices. No benchmarks or metrics for reducing GHG emissions or increasing energy efficiency are referenced within this policy.

At its meeting held September 20, 2022, City Council approved Report No. 2022-552 Public Works Corporate Policy Updates.² The purpose of the report was to make required amendments and administrative updates to the language of the Public Works Commission's Corporate Policies to ensure they were up to date. The report concluded that the Business Support and Sustainability Office would work with Departments across the Public Works Commission, and other

¹ <https://pub-brantford.escribemeetings.com/filestream.ashx?DocumentId=14389>

² <https://pub-brantford.escribemeetings.com/filestream.ashx?DocumentId=14389>

Commissions if required, to review and determine required updates to Corporate Policies, to be presented to City Council in 2023.

The City of Brantford's Corporate Climate Change Action Plan (CCAP) was approved on November 24, 2020 (Report No. 2020-472).³ The CCAP was developed through extensive consultation across various departments, reflecting the City's commitment to reaching net-zero carbon emissions by 2050, incorporating specific goals from the Corporate Energy Management Plan.

Ontario Regulation 507/18, made under the Green Energy Act, 2009, requires that all public agencies prepare an Energy Conservation and Demand Management Plan, also known as a Corporate Energy Management Plan (CEMP). The CEMP is updated every 5 years and reported on annually, inclusive of a summary of annual energy consumption and GHG emissions within all City facilities. The City's first CEMP was approved on June 23, 2014 (Report No. PW2014-050) after an extensive development process. Staff across City Departments, as well as representatives from Union Gas, Brantford Power, and EPAC, were engaged in the development of the CEMP.⁴ The City's current CEMP 2019-2024 was approved by Council on June 25, 2019 (Report No. 2019-364).⁵

7.0 Corporate Policy Context

- City of Brantford Strategic Priorities 2023-2026: Strategic Theme 10 Build a Greener Brantford
- City of Brantford Corporate Energy Management Plan
- City of Brantford Corporate Climate Change Action Plan
- City of Brantford Net-Zero Building Strategy

8.0 Input From Other Sources

- Business Support and Sustainability Office
- Engineering Services
- Facilities Operations and Maintenance

³ <https://pub-brantford.escribemeetings.com/filestream.ashx?DocumentId=6249>

⁴ <http://citynet.brantford.ca/LEGISLATIVEARCHIVE/06.16.14COWO.A.HIGHSPEEDAGENDA.PDF>

⁵ <https://pub-brantford.escribemeetings.com/filestream.ashx?DocumentId=3285>

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- Environmental Services

9.0 Analysis

The Energy Management Policy (PUBLIC WORKS-013) was developed under a different corporate structure (the Engineering and Operational Services Commission). The Policy provides a general recommendation that energy conservation initiatives be pursued, but contains no guidelines or metrics to support energy management decision-making. The only actionable guideline in the policy is that all projects related to the consumption of energy requiring over \$5,000 of capital be coordinated through the Environmental Services Department. This is no longer the standard practice, as most capital projects (including those related to the consumption of energy) require over \$5,000 of capital funding. This guideline is also now redundant, as the Environmental Services Department is part of the Public Works Commission. Capital projects are jointly managed and administered by all Departments who the project will impact, including Environmental Services. These projects are also now supported by the Climate Change Officer, who ensures that the environmental impact of all capital projects are quantified, monitored, and influenced by evidence informed sustainability standards.

The City's Corporate Energy Management Plan and Corporate Climate Change Action Plan have since replaced the governance and administration of GHG emissions reduction and energy efficiency initiatives across all City departments. The Energy Management Policy has not been updated since 2010, has a loose authority structure built around a previous Corporation structure, and contains vague language that Departments should work collaboratively to increase energy efficiency. Due to the creation, launch, and ongoing implementation and reporting for the subsequent Corporate Energy Management Plan and Corporate Climate Change Action Plan, updating the Energy Management Policy to align with these Plans and Strategies would be redundant.

9.1 Corporate Climate Change Action Plan

The City of Brantford's 2019-2024 Corporate Climate Change Action Plan (CCAP) was approved on November 24, 2020 (Report No. 2020-472), outlining the City's municipal target of net-zero carbon emissions by 2050, with the following interim targets:

- 30% reduction from 2018 levels by 2030.
- 80% reduction from 2018 levels by 2040.

- 100% (net-zero) reduction from 2018 levels by 2050.⁶

The Energy Management Policy referenced no targets for emissions reduction. It only included reference to general objectives of:

- Decreasing the consumption of non-renewable resources.
- Decreasing greenhouse gas emissions.
- Implementing sustainably environmentally friendly management practices.

The targets, monitoring, and reporting structure set out and governed by the Corporate CCAP provides more specific direction for implementation than the Energy Management Policy. Under the direction of the Corporate CCAP, a Climate Lens Calculator and Assessment Tool was developed in partnership with the Environmental and Sustainability Policy Advisory Committee (ESPAC). The Climate Lens Tool was initially launched on November 23, 2021 (Report No. 2021-655) to indicate the environmental impact of City projects by quantifying greenhouse gas emissions and contributions to waste, water, and stormwater.⁷

The City of Brantford has received recognition for its innovation as the only Ontario municipality that quantifies its carbon emissions and publically reports them using the Climate Lens Tool. Providing this information as part of every staff report to Council and Committees provides full transparency of the City's climate and environmental impacts. Staff provide Council with quarterly updates and summaries of the previous quarters' emissions and environmental impact. As of May 1, 2023, these quarterly updates were extended to ESPAC and the Environmental Implications section was permanently added to all Council and Committee report templates (Report No. 2023-143).⁸

9.2 Corporate Energy Management Plan

Ontario Regulation 507/18, made under the Green Energy Act, 2009, requires that all public agencies prepare an Energy Conservation and Demand Management Plan, also known as a Corporate Energy Management Plan (CEMP). On June 25, 2019, the City of Brantford's

⁶ <https://pub-brantford.escribemeetings.com/filestream.ashx?DocumentId=6249>

⁷ <https://pub-brantford.escribemeetings.com/filestream.ashx?DocumentId=9097>

⁸ <https://pub-brantford.escribemeetings.com/filestream.ashx?DocumentId=16094>

Energy Management Plan 2019-2024 (Report No. 2019-364) established the following energy efficiency targets:

- 2.4 ekWh/ft² reduction in energy intensity.
- 12.8% reduction in energy use.
- 7.3% reduction in greenhouse gas emissions.⁹

The CEMP is reported on annually, inclusive of a summary of annual energy consumption and greenhouse gas emissions within all City facilities. These reports are sent to the Ministry of Energy and made publically available on brantford.ca/energy-management.¹⁰ The CEMP is also required to be updated every five years, with the next update scheduled to be published by July 1, 2024 with updated targets to guide the City's energy management.

The repeal of the Energy Management Policy will result in no change to ongoing business operations or reporting practices. Staff will continue to implement and report on the progress of the Energy Management Plan and Corporate CCAP.

10.0 Financial Implications

There are no financial implications associated with this report.

11.0 Climate and Environmental Implications

Repealing the Energy Management Policy will not result in any capital or operational changes, thereby not resulting in any changes to GHG emissions or energy consumption. As a deliverable of the Corporate CCAP, the City's GHG Emissions Inventory will be used to continue monitoring and reporting on progress towards sustainability targets.

12.0 Conclusion

The purpose of the Energy Management Policy was to guide the adoption of sustainable energy management practices to reduce the City's overall environmental impact. This report highlights that the Policy is now redundant since City Council has approved the Corporate Climate Change Action Plan

⁹ <https://pub-brantford.escribemeetings.com/filestream.ashx?DocumentId=3285>

¹⁰ <https://www.brantford.ca/en/your-government/energy-management.aspx>

which guides the City's sustainability initiatives, and other guiding documents related to the reduction of GHGs such as the Energy Demand Management Plan and Net Zero Building Standard.

The repeal of the Energy Management Policy will result in no change to ongoing business operations or reporting practices. Staff will continue to implement and report on the progress of the Energy Management Plan and Corporate Climate Change Action Plan.



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Commissioner, Public Works Commission

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Attachments (if applicable)

Appendix A: PUBLIC WORKS-013 Energy Management Policy

Copy to:

NA.

In adopting this report, is a by-law or agreement required? If so, it should be referenced in the recommendation section.

By-law required yes no

Agreement(s) or other documents to be signed by Mayor and/or City Clerk yes no

Is the necessary by-law or agreement being sent concurrently to Council? yes no