



DELIVERED BY EMAIL

To: ECD-DEC@ec.gc.ca

Re: Clean Electricity Regulations

August 19, 2022

Dear Minister Steven Guilbeault,

Please accept this as a joint submission from the Canadian Environmental Law Association (“CELA”) and the Low-Income Energy Network (“LIEN”) on the Government of Canada’s proposed Frame for the Clean Electricity Regulations published in July 2022.

CELA and LIEN strongly support the Federal Government’s commitment to achieving a net-zero electricity system to combat climate change and we welcome the opportunity to provide our insight. We urge the Government of Canada to consider and prioritize the needs of low-income consumers in its Clean Electricity Regulations.

Background on CELA and LIEN

CELA is a public interest law clinic dedicated to environmental equity, justice, and health. As an Ontario legal aid clinic, CELA provides free legal services to qualifying low-income, vulnerable, and disadvantaged communities. Additionally, CELA works on law reform and legal education initiatives in Canada.

LIEN is a joint program of the Advocacy Centre for Tenants Ontario and CELA. LIEN seeks to ensure that all Ontarians have equitable access to conservation and financial assistance programs and services in order to fulfill their basic energy needs affordably and sustainably. LIEN focuses on raising awareness of, and proposing solutions to, energy poverty.

Recommendation 1: Conduct barrier studies to determine the needs of low-income consumers.

Studies should be conducted to determine the unique barriers faced by low-income Canadians in accessing clean energy and to determine the ways in which Canadian households experience disproportionate energy burdens. For example, as the proposed Frame includes the electrification of transportation, barriers in accessing zero or near-zero emission transportation, such as lack of credit cards and bank accounts for purchasing re-loadable public transit cards, must be determined.

We encourage the Federal Government to complete these studies to develop a response that best supports low-income consumers. Proactive outreach, keeping in mind accessibility issues, by the Government of Canada to low-income households must be prioritized to best understand and target their needs.

Recommendation 2: Prioritize low-income households for clean energy retrofits.

Canadians that operate on low, moderate, or fixed incomes lack the capital to pay for the upfront costs for energy upgrades. These households are significantly less likely to utilize federal incentive programs that offer low or no-interest loans to finance their energy retrofits. A targeted program that prioritizes retrofitting low-income households with clean energy will reduce greenhouse gas emissions while concurrently slashing utility bill expenses and protecting these households against future increases in fuel prices.

Individuals that reside in socially or materially deprived neighbourhoods face a higher risk of mortality in heat waves.¹ Therefore, these retrofits can help reduce the disproportionate impact of global warming on low-income Canadians by making it more affordable for them to cool their homes. Energy-efficient retrofits can protect vulnerable Canadians, including seniors and infants, from the deadly effects of high temperatures on health.

As low-income families are spending more money than ever before on housing and necessities, prioritizing energy retrofits for these households can lower utility costs to free up capital for other critical expenses while working towards achieving net-zero emissions by 2050.

Conclusion

Canada's Clean Electricity Regulations must support and prioritize low-income consumers. Strategies, proposals and plans created by the Federal Government must reflect the fact that climate change disproportionately impacts low-income Canadians who often do not have the capital to access clean energy upgrades. CELA and LIEN look forward to continuing to provide insight on other detailed proposals on climate adaptation and mitigation in Canada.

¹ Government of British Columbia, "Extreme Heat and Human Mortality: A Review of Heat-Related Deaths in B.C. in Summer 2021" (June 7, 2022), online: https://www2.gov.bc.ca/assets/gov/birth-adoption-death-marriage-and-divorce/deaths/coroners-service/death-review-panel/extreme_heat_death_review_panel_report.pdf at page 17.