



Ontario Catholic School  
Trustees' Association

**Submission to the  
Standing Committee on Justice Policy  
In regard to  
Bill 21, Energy Conservation Leadership Act  
February 2006**

## **Introduction**

Founded in 1930, the Ontario Catholic School Trustees' Association (OCSTA) represents 29 English-language Catholic district school boards and five English language Catholic school authorities. Collectively, these school boards educate over 600,000 students from junior kindergarten to grade 12.

OCSTA supports the government's efforts to ensure Ontario has a safe, clean and reliable supply of electricity. We understand that the future vitality of our communities rests on our ability to build a conservation culture in this province and we applaud the development of a tangible and constructive strategy that will achieve this end.

Catholic school boards are interested in reducing energy consumption as much as possible through good planning and management and the implementation of responsible, cost saving measures.

Almost all boards have conducted extensive activities in the past to reduce energy consumption in a variety of ways. Many have entered into third party arrangements which provided the necessary expertise and often the capital that was required to implement these plans.

## **Provisions in the Draft Legislation**

### **Annual Plan**

Schedule A, Section 4 of the Bill stipulates that the government may prescribe energy conservation targets for public agencies and that these agencies must prepare, publish and implement an itemized annual energy conservation plan that details:

1. A description of significant energy-consuming technologies and operations;
2. A summary of annual energy usage for each of the above;
3. A description of current and proposed activities and measures to conserve and reduce the amount of energy used by the agency;
4. A summary of the progress and achievements in energy conservation since the previous plan;
5. Any other information that may be required.

The effects of these requirements on school boards will be significant, particularly during the development of base-line information where such does not already exist. Small and medium sized boards may be particularly impacted by these requirements, as they may not have the detailed data that will be required to establish a plan and to maintain it. These boards will be required to develop systems which will allow them to track the data in the prescribed manner for compliance. Other boards may already be collecting data to monitor their energy consumption but it might not be in a format that will readily support compliance under this Bill. In these cases, boards would have to amend and/or adapt current systems to comply with legislation. The development of appropriate IT systems, recruitment and training of staff and the inherent cost of such could present significant challenges to some boards.

**OCSTA recommends that adequate funding be provided to enable school boards to develop appropriate systems and to recruit and train staff required to meet the energy conservation and efficiency objectives envisioned under Bill 21.**

#### **Energy Conservation Targets – Section 4 (2)**

Energy savings targets established by regulation must be reasonable and attainable by all boards. Boards that have already made considerable strides in energy conservation must not be effectively penalized under the new legislation.

**OCSTA recommends that the government establish a method by which boards can be credited for past energy conservation efforts.**

#### **Purchase of Good & Services and Capital Investments**

Schedule A, Section 6 of Bill 21 requires public agencies to consider energy conservation and efficiency in the purchase of goods and services and in capital investment. Depending on its scope, the regulations that will govern Section 6 could present operational challenges to school boards.

Regulations arising from this Bill could go beyond the purchase of heating and lighting to include, for example, the purchase of individual pieces of machinery and/or vehicles. Boards understand the importance of weighing energy conservation in the purchase of such items and when constructing and renovating buildings and already consider such factors during the process.

OCSTA is concerned, however, about the financial and operational implications should energy conservation considerations outweigh all other considerations regarding the purchase of materials or systems in new or renovated buildings and other assets.

Significant demands on school renewal dollars already exist as many school boards across the province work to address building renewal concerns. In many boards, declining enrolment is impacting allocations for school renewal. School closures, a means of responding to declining enrolment, and optimizing use of renewal dollars, is a mechanism currently not available to boards. Costs associated with implementation of the new requirements arising from Bill 21 will create added financial pressures for boards.

**OCSTA strongly urges the government to take into consideration the current pressures on pupil accommodation funding and to ensure the availability of adequate funds to support school board compliance with standards arising from Bill 21.**

## **Conclusion**

Developing an environment that encourages Ontarians and organizations to embrace a culture of energy conservation is good for the future of this province. Catholic school boards understand and are supportive of energy conservation strategies. OCSTA encourages the government to consider cost implications associated with the implementation of Bill 21 and to ensure school boards are provided with the necessary funds to achieve the objectives envisioned by this legislation.

In closing, we would like to commend the government for taking action to address issues around our province's vital power supply. We look forward to working in partnership with the government as Ontario moves forward to develop and implement a sustainable and effective conservation strategy for the future.

## **Summary of Recommendations**

- 1. OCSTA recommends that adequate funding be provided to enable school boards to develop appropriate systems and to recruit and train staff required to meet the energy conservation and efficiency objectives envisioned under Bill 21.**
- 2. OCSTA recommends that the government establish a method by which boards can be credited for past energy conservation efforts.**
- 3. OCSTA strongly urges the government to take into consideration the current pressures on pupil accommodation funding and to ensure the availability of adequate funds to support school board compliance with standards arising from Bill 21.**