April 2017 Update to Letters of Assurance

On April 7, 2017, Letters of Assurance for the BC Building Code (BCBC) were updated as part of Revision 11 of the BCBC, adding the Energy Step Code. This bulletin provides an overview of changes and how the updated Letters of Assurance are intended to be applied.

The updated schedules should be used for all schedules submitted after April 7, 2017. This does not apply retroactively for schedules that have already been submitted prior to April 7, 2017.

Fillable PDF versions of the updated schedules will be available on bccodes.ca. The Building and Safety Standards Branch supports the Architectural Institute of BC (AIBC) and the Association of Professional Engineers and Geoscientists of BC (APEGBC) in providing instruction to their respective members regarding the provision of appropriate annotations on the updated schedules, on an interim basis, until the revised schedules are made available online and formally endorsed by APEGBC and AIBC. Consultation is also underway with Building Officials’ Association of BC and the Union of BC Municipalities to formally seek endorsement of the updated Letters of Assurance.

Changes to Schedule B, forming Part of Subsection 2.2.7. of Division C of the BC Building Code

There are new line items (“design and field review requirements”) in four disciplines – Architectural, Mechanical, Plumbing and Electrical, as well as changes to some line items. The specific changes are bolded below:

Schedule B:

…
1.24 Building Envelope, Part 10, ASHRAE or NECB requirements
1.25 Building envelope, testing or confirmation of Part 10 requirements
…
3.8 Mechanical Systems, Part 10/ASHRAE or NECB requirements
3.9 Building envelope, testing/confirmation of Part 10 requirements
…
4.9 Plumbing Systems, Part 10, ASHRAE or NECB requirements
4.10 Plumbing systems, testing/confirmation of Part 10 requirements
…
6.9 Electrical Systems, Part 10, ASHRAE or NECB requirements
6.10 Electrical Systems, testing/confirmation of Part 10 requirements
…

The new line items (1.25, 3.9, 4.10, and 6.10) make explicit that the registered professional of record for each discipline is responsible for any testing or confirmation of equipment or systems, required for compliance with Part 10, within their discipline.

The contents of this Bulletin are not intended to be provided as legal advice and should not be relied upon as legal advice. For further information contact the Building & Safety Standards Branch.
“Testing/confirmation” is intended to describe activities, tests, observations or processes that provide assurance that all equipment and systems necessary to satisfy the energy and water efficiency requirements of Part 10 are present and able to perform as designed. This could include testing of the air barrier system in buildings that comply with the Energy Step Code, providing assurance that building enclosure components are consistent with the effective assembly R-values in the design, or ensuring that heating, cooling and ventilation systems are capable of functioning as designed prior to occupancy. This work may be described as ‘commissioning’, but it does not include any requirements for testing or confirmation after occupancy or beyond the requirements of Part 10.

Changes to Schedule C-A, forming Part of Subsection 2.2.7. of Division C of the BC Building Code include:

Under “I hereby give assurance that”:

Bullet (c) (“I am a registered professional as defined in the British Columbia Building Code.”) was moved to bullet (d), and replaced with a new bullet (c):

(c) I have coordinated the compliance of the building with Part 10 requirements,
(d)  I am a registered professional as defined in the British Columbia Building Code.

Energy and water efficiency are complex matters that require the coordination of a number of disciplines. This change to Schedule C-A clarifies that the coordinating registered professional has coordinated the activities of the registered professionals of record to provide assurance that the Part 10 requirements for energy and water efficiency have been coordinated and incorporated into a single compliance path within ASHRAE 90.1-2010, NECB 2011 or the Energy Step Code. This does not mean that the coordinating registered professional needs to be an expert in energy modelling, building envelopes or mechanical systems specifically; however, their responsibility is to coordinate the expertise of those disciplines to provide assurance that the building has satisfied all of the relevant requirements of Part 10.

What if an item in the updated Letters of Assurance is not relevant to a project?

As outlined in the Guide to Letters of Assurance (2010), a registered professional of record completing Schedule B may cross off and initial any items that do not apply to a project.

An item must not be crossed off if it applies to the project. A registered professional of record will have to submit a Schedule B and C-B to accept responsibility for each item applicable to the project. No other items on Letters of Assurance may be crossed off, and their language must not be altered or qualified in any way, except as noted in the Guide to Letters of Assurance (2010).

Questions related to this bulletin and the updated Letters of Assurance can be directed to CodeQuestion@gov.bc.ca.