

**From:** Joan Huzar  
**Sent:** Saturday, January 10, 2009 12:07 PM  
**To:** Muncaster, Katherine EMPR:EX  
**Cc:** 'Info Consumers Council'  
**Subject:** RE: BC water heater input

Katherine, my apologies for not responding to the initial call for comment.

The Consumers Council of Canada supports the new Energy Efficiency Standard Regulation amendments for residential water heaters.

The Council believes that consumers understand that an initial higher price will be recovered over time through lower energy bills. We also believe that this is not really an area where much consumer choice is in play. Consumers do indeed accept the recommendation of their installer, although they may ask for an energy efficient water heater, they probably would not ask for a specific make or model. It is entirely appropriate that the regulations require a high level of energy efficiency, and we are supportive of the Ministry's intention to move forward with a plan to increase the efficiency levels required.

We are confident that the market will indeed fill any gaps left by the removal of some models that cannot meet the new requirements.

The Council also supports the labeling of water heaters to indicate their level of efficiency, and hopes that a program will be put in place to educate consumers to look for such a label and understand what it means. Enforcement is also an important part of any regulatory change, and we trust that every effort will be made to ensure that installers are informed of the requirements, and inspected to ensure compliance.

There may be an issue for consumers who are enticed to "fuel switch" to gain a "long term benefit". The Council does have concerns that consumers may be misled, or not understand the full ramifications of a switch. We recommend that government, in cooperation with the utilities, develop a plan to inform consumers of the issues around fuel switching, the benefits and possible drawbacks and consequences.

I trust these comments are helpful and look forward to the implementation of the regulations accompanied by a consumer education plan and a well developed enforcement program.

Joan Huzar,  
Chair, Energy Committee  
Consumers Council of Canada  
Phone: 250-995-3154