

November 21, 2022

Ministry of Energy  
Conservation and Renewable Energy Division, Energy Conservation Unit  
77 Grenville St., 5th floor  
Toronto, ON M7A 2C1

**Re: 019-6168 Proposed amendments to O. Reg 507/18 (“Broader Public Sector: Energy Reporting and Conservation and Demand Management Plans”) under the Electricity Act, 1998**

Dear Ministry Officials:

I am writing on behalf of the [Association of Municipal Managers, Clerks and Treasurers of Ontario \(AMCTO\)](#). We thank you for the opportunity to provide input into the “Proposed amendments to O. Reg 507/18 (“Broader Public Sector: Energy Reporting and Conservation and Demand Management Plans”) under the Electricity Act, 1998” posted to the Regulatory Registry.

AMCTO represents excellence in local government management and leadership. With over 2100 municipal managers and professional members (e.g., CAOs, clerks, treasurers, management) covering all of Ontario’s municipalities, we are Ontario’s largest voluntary association of local government professionals and are recognized as an influential voice on key management and legislative issues affecting the sector.

For over 80 years, AMCTO has maintained a productive relationship with government by helping ensure the professional expertise and local understanding of our members is utilized to improve existing and/or new legislation, policy and programs. This work includes our [continued advocacy](#) on reducing the municipal reporting and administrative burden.

Local governments in Ontario are straining under a range of reporting requirements. Reporting to the Province is both important and necessary. It helps the Province ensure accountability, monitor performance of funded programs, and ensure that transferred money is being spent appropriately. For several years, AMCTO has promoted other reduction of administrative burdens on municipalities.

Recognizing that making changes to improve reporting will not automatically solve the bigger policy issues that municipalities are tasked with, it will nevertheless give them the opportunity to mitigate barriers to effective service delivery and in the case of this proposal, more easily understand and address their statutory reporting responsibilities.

We are encouraged to see the proposal from the Ministry of Energy which would streamline energy reporting including finding a new reporting solution that many municipalities utilize already or are compatible with, in the Energy Star Portfolio Manager. This interface would alleviate the need to double-enter data and makes it easy to satisfy benchmarking legislation requirements. Entering data into one source will also help standardize and produce consistent reporting amongst facilities.

For some municipalities this change over will require initial investment of time and resources. Our members have expressed some concern about any manual uploads for municipal properties that may need to be set up in the Energy Star Portfolio manager as some municipalities have hundreds of facilities. Municipalities would appreciate additional resources, guidance, and financial support from the ministry to do this as they have limited financial capacity.

This proposal appears to directly address recommendations AMCTO has [made on reducing the reporting burden](#). AMCTO looks forward to reviewing more proposals that continue to streamline legislation and regulations that impact municipalities and their administrators. AMCTO supports approaches to streamlining regulations to make them more clear, consistent and easily applicable.

For any questions, please do not hesitate to contact David Arbuckle, Executive Director ([darbuckle@amcto.com](mailto:darbuckle@amcto.com)) who will be happy to assist.

Sincerely,



Elana Arthurs, CMO, AOMC  
President, AMCTO

CC: Jason Fitzsimmons, Deputy Minister, Ministry of Energy  
Kate Manson-Smith, Deputy Minister, Ministry of Municipal Affairs and Housing