



**STAFF REPORT
ACTION REQUIRED**

Environment and Energy Efficiency Functions

Date:	September 24, 2012
To:	Executive Committee
From:	City Manager
Wards:	City-wide
Ref. Number:	

SUMMARY

This report presents findings and directions resulting from the City Manager’s review of environment and energy efficiency functions in the City of Toronto. The administrative reorganization responds to recommendations in the Core Services Review, as well as other directives from Council, and acts on opportunities to improve effectiveness and efficiency in providing environment and energy functions in the City.

A summary, for the information of Council, is provided on the administrative restructuring of environment and energy functions in the City, with the current suite of program offerings continuing into 2013. The primary structural change is a consolidation of functions currently located in the Energy & Strategic Initiatives group in the Facilities Division and the Toronto Environment Office in a new Environment & Energy Office under the direct purview of the Chief Corporate Officer. The Chief Corporate Officer will lead the City’s environment and energy objectives and corporate policies, including cross-corporate coordination of policy development and implementation in operating divisions.

To achieve optimum effectiveness and efficiency, environment and energy activities and expertise that are inherently integrated with operations will continue to be decentralized and the responsibility of the operating program: Toronto Public Health (environmental health programs), City Planning (environment policies in the Official Plan and their consideration in the development review process), Toronto Water (water efficiency and conservation) and Solid Waste Management (blue box and green bin diversion).

Additional changes to achieve improvements in the effectiveness and efficiency of environment and energy functions require Council approval. These include: enhancing the program capacity of the Toronto Atmospheric Fund (TAF) by rescinding Council policies that divert TAF funds to non-grant purposes; assuming TAF’s powers to the

extent of transferring management of the investment of TAF funds to the City and replacing TAF's investment objectives with the City's investment strategies, as provided for in the *Toronto Atmospheric Fund Act, 2005*; eliminating TAF's involvement in the governance of the Clean Air Partnership (CAP) to enable CAP to function more independently as a charitable organization; and undertaking a further study of long-range strategies and objectives for Toronto Hydro and TAF in support of the City's environment and energy objectives.

RECOMMENDATIONS

The City Manager recommends that:

1. City Council request the City Manager to consult with Toronto Hydro and review and report to Council on specific long-range strategies and objectives of Toronto Hydro in relation to the City's environment and energy objectives.
2. City Council request the City Manager to consult with the Toronto Atmospheric Fund (TAF) and review and report to Council on specific long-range strategies and objectives for the TAF program in relation to the City's environment and energy objectives.
3. City Council assume the powers for the investment of TAF funds not immediately required for TAF's objects, attendant liabilities, and TAF Board by-laws and resolutions related to the assumed powers by:
 - a. rescinding the delegation of certain powers to TAF and reinstating the authority of the City Treasurer to manage the investment of the TAF funds not immediately required for TAF's objects, pertaining to the investment of marketable securities and cash reserves, under Subsections 8(4), 8(7) and 13(1) of the *Toronto Atmospheric Fund Act, 2005* (TAF Act), Section 145 of the *City of Toronto Act, 2006* (COTA) and Section 2 of O.Reg 589/06 under COTA, to be effective upon the enactment of the requisite by-law;
 - b. amending the Council-approved investment objectives and principles for TAF:
 - i. to provide for the management by the City Treasurer of public market investments (marketable securities and cash reserves) of the TAF funds not immediately required for TAF's objects; and
 - ii. to consequentially amend the allocation of the funds available for TAF's use by increasing the range of assets permitted in private direct lending/investment (e.g., TAF loans) from 40% to a maximum of 75% while reducing the range of assets permitted in private pooled equity (e.g., placements in private equities that relate to TAF's mandate) from 10% to a maximum of 5%;

- c. delegating to the City Manager, Deputy City Manager & Chief Financial Officer and TAF authority to revise TAF's investment objectives and principles to give effect to the changes in Recommendations 3a and 3b; and
 - d. granting authority to the Deputy City Manager & Chief Financial Officer and the City Treasurer to implement the transition from the current management and mix of the investment of TAF funds to investment by the City Treasurer utilizing the City's legislated investment powers and the City's investment strategies as provided for in Subsections 8(3), (4) and (7) of the TAF Act in order to give effect to Recommendations 3a and 3b, and allowing any existing investments made under the 2010 TAF investment objectives to be deemed authorized and valid during the transition.
4. City Council enhance TAF's role to provide grants under Subsection 5(2) of the TAF Act by rescinding Council policies requiring TAF to provide mandatory funding for City projects and to fund the City's participation fees in the Greater Toronto Area Clean Air Council (GTA-CAC), the latter obligation to be absorbed by the Environment & Energy Office.
5. City Council reinforce the independence of the Clean Air Partnership (CAP), established under Sections 17 and 19 of the TAF Act as a not-for-profit charitable organization that functions independently from the City, by amending governance provisions under Subsection 18(2) of the *Toronto Atmospheric Fund Act, 2005*, to be effective upon the enactment of the requisite by-law:
- a. City Council rescind the limited authority delegated to the Toronto Atmospheric Fund to determine certain CAP governance matters including the appointment of directors to the board of CAP.
 - b. City Council delegate to CAP under Subsection 18(2) of the TAF Act the powers to determine all of the governance matters set out in Subsection 18(1) of the TAF Act, subject to the CAP board having good governance practices in place including:
 - i. holding open meetings;
 - ii. publishing annual audited financial statements;
 - iii. having a Governance Committee of the board;
 - iv. establishing a nominations process to the board;
 - v. maintaining the size of the board at no less than 3 directors; and
 - vi. having a policy that makes employees of the City and its agencies and corporations ineligible for appointment to the board of the Clean Air Partnership.

6. City Council authorize the City Solicitor to introduce a by-law or by-laws to give effect to Recommendations 3 and 5 above.
7. City Council request that the City Manager consult with TAF and revise the TAF Relationship Framework agreement to reflect the recommendations in this report approved by Council.
8. City Council receive for information the summary of the administrative restructuring of environment and energy functions.
9. City Council direct that this report be forwarded to the Boards of the Toronto Atmospheric Fund, Clean Air Partnership and Toronto Hydro for their information.

Financial Impact

The structural reorganization will involve consolidation and streamlining of functions which will result in some savings through rationalization of positions and management span of control over time and will be identified during implementation and reported out in 2013 or in the subsequent budget process.

Annual savings to TAF of approximately \$140,000 will result by the change to have the City Treasurer re-assume responsibility for the investment function for the TAF Fund following the transition (subject to any outstanding TAF obligations or liabilities that the City would assume and which would be borne by the Fund). There is no additional cost to the City as the investment of TAF funds will simply be combined with the investment of City funds. Additional annual savings to TAF of \$100,000 will result by transferring from TAF to the City the obligation to cover the City's participation fees in the Greater Toronto Area Clean Air Council (GTA-CAC). This obligation will be absorbed by the Environment & Energy Office starting in 2012 by efficiencies found within the approved operating budget for the Toronto Environment Office. The net annual savings to TAF of approximately \$240,000 will be available to enhance TAF's programs.

The strategy for financing energy projects and the status of the City's Sustainable Energy Funds are being addressed through a separate report from the Deputy City Manager & Chief Financial Officer.

The Deputy City Manager & Chief Financial Officer has reviewed this report and concurs with the financial impact statement.

Decision History

This report responds to a series of Council and Committee directives as follows:

EX10.1 Core Service Review - Final Report to Executive Committee
Executive Committee Decision Advice, Executive Committee consideration on
September 19, 2011; City Council Decision, September 26 and 27, 2011
<http://app.toronto.ca/tmmis/viewAgendaItemHistory.do?item=2011.EX10.1>

Executive Committee Decision Advice:

- “1o. Toronto Environment Office – Consolidate, and reduce environmental services within divisions, and agencies, and refocus their mandates on services that, in the opinion of the City Manager, are required to meet regulatory environmental reporting requirements, support the City's interests, or have the greatest return on investment.

- 1p. Toronto Atmospheric Fund – Consolidate, and reduce environmental services within divisions, and agencies, and refocus their mandates on services that, in the opinion of the City Manager, are required to meet regulatory environmental reporting requirements, support the City's interests, or have the greatest return on investment.”

City Council Decision, March 8 & 9, 2011, AU 1.11
<http://app.toronto.ca/tmmis/viewAgendaItemHistory.do?item=2011.AU1.11>

“City Council request the City Manager to review the City’s various environmental grant programs to ensure they are structured and managed as efficiently and effectively as possible. The results of the review, along with any recommendations, be reported to Executive Committee.”

City Council Decision, January 17, 2011, EX. 2.10
<http://app.toronto.ca/tmmis/viewAgendaItemHistory.do?item=2011.EX2.10>

“The Executive Committee referred the item to the City Manager for a general review, including the achievement of the fund’s original goals, operational processes and the economic benefits of the fund.”

COMMENTS

The Need for Change

Environment and energy programs are currently delivered by 7 City divisions and 2 City agencies. The City Manager’s review of environment and energy efficiency functions in the City administration, which included program analysis and advice from KPMG to the

City Manager, identified a number of issues and potential areas to improve effectiveness and efficiency. In the current state, the delivery of environment and energy programs and functions is characterized by:

- service delivery fragmentation, with environment and energy activities spread across several divisions and agencies (refer to Appendix 1 and 2);
- overlap of functional responsibilities, with multiple organizations serving similar client groups or objectives (e.g., several programs focusing on retrofits; grants being provided by more than one program);
- lack of effective cross-corporate coordination;
- role confusion with entanglement of responsibilities and business processes (e.g., externally-focussed programs funding internal projects; one program determining board appointments for another; one program responsible for part of another program's regulatory responsibility);
- lack of a common framework of performances metrics (i.e., difficulty in assessing progress and goal achievement).

Opportunities for Improvement

The review examined opportunities to improve effectiveness and efficiency in providing environment and energy functions. KPMG recommended looking at areas where centralizing or decentralizing functions would provide benefits and improved functioning and potential savings. The review identified the following opportunities:

- improving cross-corporate policy coordination and performance monitoring;
- more cost-effective organization of functions, with centralization of functions where appropriate, including policy development and environment/energy capital projects;
- reducing functional overlap and disentangling roles; and
- decentralizing functions where they are an integral part of an operating program.

PART A

Administrative Restructuring of Environment and Energy Functions

The environment and energy functions in the City are being reorganized, streamlined and rationalized to improve overall effectiveness and efficiency. The primary objective of the administrative restructuring was to identify opportunities to maintain the delivery of services and programs in this sector while applying City resources in a more effective and efficient manner.

The current suite of program offerings will continue; however, roles, functions and organizational locations will be modified to achieve a new and more efficient organizational structure and program delivery process. For affected program areas, budgets were already reduced through the 2012 budget. While not the primary objective of the review, the reorganization is expected to yield some savings (approximately 5%) in addition to reductions already implemented in the 2012 budget, once fully implemented.

Savings will arise where opportunities are identified during the implementation phase, for example, through consolidation of positions through workload analysis and the rationalization of management span of control.

The key features of the administrative organizational restructuring are as follows:

1. Centralized Functions – Environment & Energy Office

Environment and energy functions with cross-corporate mandates and the ability to provide greater coordination and oversight will be centralized:

- environment, climate adaptation and energy policies and plans;
- management of environment and energy programs and capital projects;
- performance management; and
- public and stakeholder engagement.

The primary structural change will be the consolidation and integration of the Toronto Environment Office and the Energy & Strategic Initiatives group in the Facilities division in a new Environment & Energy Office under the direct purview of the Chief Corporate Officer.

The Chief Corporate Officer will lead on the City's environment and energy objectives and initiatives, and will work with the City Manager's Office on facilitating coordination with City agencies and corporations. The Chief Corporate Officer will also lead on all environment and energy policy, including cross-corporate coordination of policy development and implementation in operating divisions.

In addition, there will be a new and enhanced focus on legislative requirements and reporting, and on performance measurement and monitoring.

2. Decentralized Functions

A number of environment and energy functions were found to be an integral component of the core mandate of a division or agency, often of a highly operational or specialized nature. To achieve optimum effectiveness and efficiency, where services and expertise are inherently integrated with operations, environment and energy functions will continue to be decentralized and be the responsibility of an operating program. Environment and energy functions to be maintained as functions of operating programs include:

- Toronto Public Health will continue to deliver environmental health programs;
- City Planning will continue to develop environmental policies for the Official Plan and apply them in the development review process;
- Toronto Water will continue to promote water efficiency and conservation; and
- Solid Waste Management will continue to manage implementation of environmental programs such as blue box and green bin diversion.

Three program responsibilities are exceptions to the primary structural change involving the consolidation of the Toronto Environment Office and the Energy & Strategic Initiatives group in a new Environment & Energy Office:

- the Strategic Policy & Projects unit which deals with changes to building spaces and office re-design, and the Strategic Projects unit which deals with heritage buildings and projects, both currently in Energy & Strategic Initiatives, will remain in the Facilities division;
- responsibilities in the Toronto Environment Office for conducting air quality modelling, which are part of the mandate set out in the Provincial government's Ontario Public Health Standards for public health units, will be transferred to Toronto Public Health together with two staff positions; and
- the external community grants programs previously administered by the Toronto Environment Office are being phased out, reinforcing the role of TAF as the primary program area providing community grants for energy, environment (air quality) and climate change related objectives.

The focus of the Tower Renewal Office is much broader than energy objectives. The Tower Renewal Office has a mandate to drive environmental, social, economic and cultural change by improving Toronto's concrete apartment towers and the neighbourhoods that surround them. As a community revitalization approach, it encompasses human services, economic and community development objectives in conjunction with improvements to building stock and energy conservation in residential high rise buildings.

Currently much of the City's community revitalization work is coordinated through the Community Revitalization Unit in Social Development, Finance & Administration which takes a holistic approach to physical, social and economic infrastructure improvements to build safer, stronger and healthier neighbourhoods. Given the alignment and linkages between the Tower Renewal and Community Revitalization mandates, transferring the Tower Renewal Office to Social Development, Finance & Administration will facilitate greater collaboration and coordination. The combined Tower Renewal/Community Revitalization function will integrate the work of divisions across the City and with our external partners to revitalize tower neighbourhoods.

PART B

Administrative Restructuring – Matters Requiring Council Approval

Additional changes are required to address matters directly related to achieving improvements in the effectiveness and efficiency of environmental and energy functions. These matters require approval by City Council.

1. Alignment – Strategic Objectives

Toronto Hydro provides an electricity distribution system that supports the electricity demands of residents and businesses in Toronto. City Council's Shareholder Direction to Toronto Hydro provides that Toronto Hydro is to operate in an environmentally responsible manner consistent with the City's energy and climate change objectives. It is timely to ensure good alignment of strategies and objectives between Toronto Hydro and the City. The City Manager will consult with Toronto Hydro to review and identify how specific long-range strategies and objectives of Toronto Hydro should relate to the City's environmental and energy objectives, subject to the regulatory jurisdiction of the Ontario Energy Board and the relevant Provincial ministries.

TAF provides grants and loans and undertakes related initiatives in Toronto to further its mandate (as described in section 2 below). The City's Relationship Framework with TAF reflects both the City's objectives and TAF's mandate. It is timely to ensure good alignment of strategies and objectives, to clarify program goals and directions, and to review and update the Relationship Framework between TAF and the City. The City Manager will consult with TAF to review and identify how specific long-range strategies and objectives for the TAF program should relate to the City's environmental and energy objectives.

2. Centralized Function – Fund Investment Management

TAF's primary mandate is promotion of climate stabilization, reduction of greenhouse gas emissions, promotion of air quality improvement, and energy conservation and efficiency, as set out in the TAF Act. TAF does this primarily through grants and loans and related initiatives. Investment of TAF funds not required for TAF's immediate use is a secondary function, subject to the advancement of moneys from the investments to enable TAF to pursue its objects.

Centralized fund management is a general responsibility of the City's Deputy City Manager & Chief Financial Officer and his staff, primarily non-equity investments. The TAF Act names the City Treasurer as the City official responsible for making investments on behalf of the City, unless authority is delegated. TAF currently retains external advisors and managers to manage the investments of its funds, both equity and non-equity investments, at an annual cost of approximately \$22,000 for advisor services and \$120,000 for fund managers (varies according to the status of the portfolio of investments). It is proposed that fund investment management responsibilities be centralized under the purview of the Deputy City Manager & Chief Financial Officer in the Corporate Finance division. City management of TAF fund investments is provided for in the TAF Act. The TAF funds to be invested for TAF's future use by the City Treasurer are those funds not immediately required for TAF's objects. TAF will continue to determine its cash-flow requirements and the moneys required for its objects.

One benefit from the change to the TAF investment objectives and activities is avoiding the volatility of equity markets which has implications for sustainment of TAF's ability to operate its programs. Another benefit is annual savings to TAF that result from adding the responsibility for the investment of TAF's funds to the City's existing and larger investment management responsibilities.

TAF's Council-approved investment objectives and principles are no longer appropriate in the context of the changes proposed in this report. TAF's investment objectives and principles as they relate to public market investments (marketable securities and cash reserves) will be managed by the City Treasurer according to the City's investment strategies. TAF's investment objectives and principles as they pertain to management of the investment and the allocation across asset classes will need to be updated to reflect the changes arising through this report.

A transition period is required to allow for public market investment of TAF funds by the City Treasurer to be moved to investment according to the City's investment strategies. TAF's investment objectives around other asset classes will also be affected by this change.

TAF is encouraged to focus on mandate-related loans for energy projects where returns are stable yet can range in the 7% to 9% range. Following consultation with TAF staff, it is proposed that the TAF investment objectives and principles be amended with respect to the asset mix of the TAF Fund by increasing the range of assets permitted in private direct lending/investment (e.g., TAF loans) from 40% to a maximum of 75%. At the same time, the range of assets permitted in private pooled equity (e.g., placements in private equities that relate to TAF's mandate) should be reduced from 10% to a maximum of 5%, which reflects limited activity in this asset class due to the higher associated risks. The City Manager will consult with TAF to revise TAF's investment objectives and principles to give effect to these changes.

Implementation of these changes will require some time, but will move ahead in a purposeful manner with the aim of completing all aspects of the transition before the end of 2013. The Deputy City Manager & Chief Financial Officer and the City Treasurer will consult with TAF on transition strategies and timing, and will implement a transition in the investment of TAF funds to investment by the City Treasurer. The City Treasurer will invest the TAF funds according to the City's investment strategies as provided for in Subsections 8(3), (4) and (7) of the TAF Act. Given the transition requirement, any existing investments made under the 2010 TAF investment objectives are deemed authorized and valid during the transition period.

Upon Council approval, the City through the City Treasurer will be assuming the powers of the TAF Board to direct the investment of TAF funds not immediately required by TAF for its objects, and the investment strategies will change as outlined above. TAF and the City Treasurer will develop appropriate administrative procedures to transfer moneys requested by TAF for its program requirements. TAF will continue to set program priorities and determine the funds it requires from time-

to-time for these purposes. TAF and the City will continue to ensure adherence to any conditions attached to any donations made to TAF.

3. Role Clarification – TAF Grants

Under Section 5(2) of the TAF Act, TAF's role is to provide grants to external groups and organizations. To enhance TAF's capacity to provide external grants, and to mitigate against the concerns of moving to a more conservative investment of TAF funds by the City, it is proposed that Council rescind specific policies requiring TAF to provide mandatory funding to: (a) cover the City's participation fees in the Greater Toronto Area Clean Air Council (GTA-CAC), and (b) City projects. The TAF contributions towards City projects, which were tied to a multi-year rolling average, had been expected to reach historical levels of annual contributions to the City in the range of approximately 35% of TAF's grant expenditures. However, the contributions have not consistently met the expected target, and the pool of TAF funds available for TAF programs has not always reached expected levels, given the performance of fund investments.

4. Role Clarification – Clean Air Partnership Governance

Under Sections 17 and 19 of the TAF Act, the Clean Air Partnership (CAP) is established as a not-for-profit charitable organization that operates arms-length from the City, a second organization established under the TAF Act in addition to TAF itself. CAP is not funded by the City, although the City may contract services from or partner with CAP on specific initiatives. However, CAP's ability to raise funds as a charitable organization is compromised by the involvement of the City and TAF in CAP's governance, particularly appointment of directors to the CAP board. The TAF Act provides for CAP to appoint its own board of directors, consistent with the practice common in the not-for-profit sector.

Governance roles should be disentangled and CAP's independence should be reinforced. It is therefore proposed that Council rescind the limited authority delegated to TAF to determine CAP governance matters including the appointment of directors to the board. Instead, under Subsection 18(2) of the TAF Act, it is proposed that Council delegate to the CAP Board the powers to determine all of the governance matters set out in Subsection 18(1) of the TAF Act. Council's delegation to CAP should be subject to CAP maintaining good governance practices, practices that CAP has confirmed with the City Manager's Office as being in place, including:

- holding open meetings (required by Sec. 22 of TAF Act);
- publishing annual audited financial statements (required by Sec. 25 of TAF Act);
- having a Governance Committee of the board;
- establishing a nominations process to the board;
- maintaining the size of the board at no less than 3 directors; and
- having a policy that makes employees of the City and its agencies and corporations ineligible for appointment to the board of the Clean Air Partnership.

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SIGNATURE

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ATTACHMENTS

- Appendix 1: Current Environment and Energy Functions – City Divisions
- Appendix 2: Current Environment and Energy Functions – City Agencies and Corporations
- Appendix 3: Proposed Functions – Environment & Energy Office

Appendix 1: Current Environment and Energy Functions – City Divisions

Toronto Environment Office (TEO)

- Policy development - environment & energy
- Policy coordination
- Legislative and regulatory analysis
- Environment and energy plans
- Intergovernmental program relationships
- Monitoring and reporting
- Research and advisory services
- Legislative and regulatory reporting
- Public and stakeholder engagement
- Awards and recognition
- Community events
- Sponsorships
- Incentive/grants programs

Facilities Division – Energy & Strategic Initiative Office (ESI)

- Policy development - energy
- Energy efficiency initiatives:
 - Loans administration to 3rd parties - Better Building Partnerships (BBP)
 - Reserve/revolving fund priority setting & allocation - Sustainable Energy Funds
- Renewable energy generation
- Waste and energy management
- Capital Project Planning & Management:
 - Project design and evaluation
 - Cost-benefit analysis
 - Developing standards and technical specifications
 - Coordinated energy purchasing and billing

City Planning

- Environmental & energy related planning
 - Official Plan
 - Zoning
 - Development applications
 - Standards

Toronto Public Health

- Environmental Health Promotion and Protection
- Policy & By-law development - support to Board of Health
- Ontario Public Health Standards programming

Tower Renewal Office (City Manager's Office)

- Energy retrofits in multi-residential high-rise tower properties (3rd parties and Toronto Community Housing Corporation) and neighbourhood revitalization

Solid Waste

- Waste Management Operations:
 - Public engagement & communications
 - Capital project management
 - Waste to energy projects

Corporate Support in Other Areas

- Strategic and Corporate Policy, CMO
 - Intergovernmental funding transfers coordination
- Corporate Finance
 - City Treasury fund management (revolving funds for grants and loans)
- Policy, Planning, Finance and Administration (PPFA) - Public Consultation Unit
 - Public consultations - Environmental Assessments
 - Community Environment Days (for Solid Waste)
- Purchasing and Materials Management
 - Green Procurement

Toronto Water

- Water Utility Operations:
 - Public engagement & communications
 - Efficiency incentives / customer programming
 - Capital project management

Appendix 2: Current Environment and Energy Functions – City Agencies and Corporations

Toronto Atmospheric Fund (TAF)

- Fund Management – endowment fund investments
- Partnerships, Innovation and Incentive Programming:
 - Grants Administration to 3rd parties & City capital projects
 - Loans administration to 3rd parties
 - Green technology facilitation
- Intergovernmental program relationships

Toronto Hydro Corporation

- Electrical Utility Operations:
 - Public engagement and communications
 - Efficiency incentives /customer programming
 - Capital project management

Other City Agencies & Corporations

- Capital management and planning
- Green procurement policies

Appendix 3: Proposed Functions – Environment & Energy Office

Mandate: Provision of cross corporate leadership, coordination and accountability for environment and energy sustainability outcomes.

Energy & Environmental Initiatives

- Energy efficiency initiatives
- Renewable energy management
- Waste and energy management
- Capital project management:
 - Project design and evaluation
 - Cost-benefit analysis
 - Developing standards and technical specifications
- Coordinated energy purchasing and billing

Capital Project Planning

- Coordination of intergovernmental funding transfers – FCM Green Funds
- Reserve / revolving fund priority setting and allocation – City capital projects

Policy Development & Coordination

- Policy development
- Policy coordination
- Legislative and regulatory analysis
- Environment and energy plans
- Climate change adaptation strategies
- Intergovernmental program relationships

Public & Stakeholder Engagement

- Public engagement
- Awards & recognition
- Community Events
- Sponsorships

Performance Management

- Monitoring & reporting:
 - Climate change targets
 - Energy sustainability
 - Carbon credits
- Program indicators development
- Legislative & regulatory reporting:
 - Green Energy Act (ON)
 - National Pollutant Release Inventory (CAN)
 - ChemTRAC By-law (Toronto)