

<b>DOCKETED</b>	
<b>Docket Number:</b>	19-BSTD-03
<b>Project Title:</b>	2022 Energy Code Pre-Rulemaking
<b>TN #:</b>	235435
<b>Document Title:</b>	Andrew Mochulsky Comments - Canndescent opposes the counter-productive proposals in the CASE team
<b>Description:</b>	N/A
<b>Filer:</b>	System
<b>Organization:</b>	Andrew Mochulsky
<b>Submitter Role:</b>	Public
<b>Submission Date:</b>	10/27/2020 8:24:24 AM
<b>Docketed Date:</b>	10/27/2020

*Comment Received From: Andrew Mochulsky  
Submitted On: 10/27/2020  
Docket Number: 19-BSTD-03*

## **Cannadescent opposes the counter-productive proposals in the CASE team**

Effectively mandating a transition to LED lighting for indoor cannabis cultivation will increase total power draw. The state of the art in LED lighting does not produce the yields per plant that may be realized with HPS, with academic studies showing up to 40% lower yields under LED. This decreased per-plant yield will force cultivators to expand canopy space by either adding growing facilities or double-stacking plants in existing facilities, increasing total power draw over original levels. A study from PL Light Systems, a manufacturer and distributor of both LED and HPS lights, found a 60% increase in overall power draw in a double-stacked LED system versus a single-level HPS facility. The increased overall power draw, combined with the substantial cost of retrofitting existing facilities or adding additional licensed canopy space, will ultimately be borne by the cannabis customer—and will divert greater numbers of users into the California illicit market that, to this day, is far larger than the legal market. This increase in cost will put California cannabis cultivators at a comparative disadvantage in the nationwide cannabis industry, and in the event of national decriminalization or legalization, would risk a substantial loss of jobs and cannabis tax revenue.

Indoor cannabis cultivators are keen to cut costs for all inputs, especially for power. The state of the art in LED lighting simply does not yield enough cannabis to make economic sense for growers. Forcing through such a requirement will hurt the industry, hurt the consumers—and not save any power.