

DOCKETED	
Docket Number:	19-BSTD-03
Project Title:	2022 Energy Code Pre-Rulemaking
TN #:	235455
Document Title:	Anthony Serres Comments - Comments on Draft CASE Report – Controlled Environment Horticulture 2022-NR-COV PROC4-D – June 2020
Description:	N/A
Filer:	System
Organization:	Anthony Serres
Submitter Role:	Public
Submission Date:	10/29/2020 11:19:40 AM
Docketed Date:	10/29/2020

*Comment Received From: Anthony Serres
Submitted On: 10/29/2020
Docket Number: 19-BSTD-03*

**Comments on Draft CASE Report “ Controlled Environment
Horticulture 2022-NR-COV PROC4-D “ June 2020**

Additional submitted attachment is included below.



October 13, 2020

Submitted electronically

California Energy Commission
Andrew McAllister, PhD
1516 9th St
Sacramento, CA 95814

**RE: Comments on Draft CASE Report – Controlled Environment Horticulture 2022-NR-COV
PROC4-D – June 2020**

Dear Commissioner McAlister:

Signify (formerly Philips Lighting) appreciates the opportunity to comment on the draft report. Our detailed comments follow.

Signify is a global leader in lighting products, systems and services. Our understanding of how lighting positively affects people coupled with our deep technological know-how enable us to deliver digital lighting innovations that unlock new business value, deliver rich user experiences, and help to improve lives. Serving professional and consumer markets, we sell more energy efficient LED lighting than any other company. We lead the industry in connected lighting systems and services, leveraging the Internet of Things to take light beyond illumination and transform homes, buildings, and urban spaces. We have achieved carbon neutrality for all our operations across the world and we are using 100% renewable electricity. In 2017, 2018 and 2019 we were named as an Industry Leader in our category in the Dow Jones Sustainability Index.

Please contact me if you have any questions.

Sincerely,

A handwritten signature in black ink that reads 'Anthony Serres'.

Anthony W. Serres, LC
Manager, Technical Policy

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Comments

Draft CASE Report - Controlled Environment Horticulture

2022-NR-COV-PROC4-F – October 2020

Oct 27, 2020

Signify welcomes the opportunity to comment on the draft CASE report. Our general observations about this subject are below.

General Comments – 2.1 $\mu\text{mol}/\text{J}$

Signify takes exception to the requirement of 2.1 micromoles per joule as the minimum PPE for luminaires used for plant growth and maintenance in indoor growing facilities with more than 1000 ft² of canopy. We appreciate that the case team has modified this recommendation to be a maximum recommended level.

This value was initially chosen to align with the value of 2.1 $\mu\text{mol}/\text{J}$ that appeared in Draft 1 of the DLC v2.0 specification. The value in the final DLC specification has been set at 1.9 $\mu\text{mol}/\text{J}$.

Thus, we ask that the Commission change the value from 2.1 $\mu\text{mol}/\text{J}$ to 1.9 $\mu\text{mol}/\text{J}$ in the 45 day language of the 2022 Building Energy Efficiency Standards. It is better for the horticultural market's development to have a consistent set of product requirements throughout the entire US.

END COMMENTS