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*Comment Received From: Todd DeMonte, CIO of Madison Indoor Air Quality  
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**Todd DeMonte Madison Industries Comments - 2022-NR-COV-  
PROC4-F CEH Final Case Report**

*Additional submitted attachment is included below.*

# MADISON

## IAQ

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November 6, 2020

***To Our Colleagues on the CEH CASE Team and the CEC 2022 Energy Code team:***

On behalf of Madison Industries, the parent company of Quest, I am writing to submit comment on the Final CASE Report 2022-NR-COV-PROC4-F, Controlled Environment Horticulture.

**Proposed Dehumidification Changes**

My original suggestion to the CEH CASE team was to strike the following proposed wording from the previous draft:

“In buildings with less than 2,000 square feet of canopy in combined CEH spaces, stand-alone dehumidification units with a minimum energy factor of 1.9 L/kWh are permitted,”

We did not feel it was fair to remove such a simple to operate, effective and efficient dehumidification option from the architect and engineering community’s toolbelt when designing CEH facilities.

While we believe that Integrated HVAC Systems with On-site Heat Recovery are the future of large CEH facilities, not every grower is ready to tackle the complexities of operating and maintaining such a system. For many, better overall facility efficiencies can be gained by using a simple air conditioning system coupled with high efficiency stand-alone dehumidifiers. The operational simplicity, ease of maintenance and minimal commissioning required means the CEH facility does not need to dedicate time and resources to develop the technical knowledge an Integrated HVAC system requires.

***I endorse the proposed regulations in Section 120.6 (h) (2): Indoor Growing, Dehumidification as they exist in Final CASE Report 2022-NR-COV-PROC4-F and encourage the CEC to adopt as currently written.***

**Comments on the CASE CEH Draft Team**

I would like to thank the CASE draft team for their hard work and vision in pulling together such a comprehensive draft of regulations for the CEH industry. Hopefully, other states will use this as guidance as they build their own regulations. I look forward to seeing the implementation of this Energy Code in 2023.

I’d be happy to further discuss any of my comments above.

Kind regards,

Todd DeMonte

Todd DeMonte

Chief Innovation Officer, MIAQ