

DOCKETED	
Docket Number:	19-BSTD-03
Project Title:	2022 Energy Code Pre-Rulemaking
TN #:	235430
Document Title:	Hawthorne Gardening Company Comments - CASE Report Standards
Description:	N/A
Filer:	System
Organization:	Hawthorne Gardening Company
Submitter Role:	Public
Submission Date:	10/27/2020 8:40:19 AM
Docketed Date:	10/27/2020

Comment Received From: Hawthorne Gardening Company
Submitted On: 10/27/2020
Docket Number: 19-BSTD-03

CASE Report Standards

We respectfully request that the CEC changes its lighting efficiency standards to measure monthly peak energy use instead of fixture PPE. PPE is a lighting focused metric and ignores other energy consuming components in a hydroponic cultivation system. The CEC could regulate energy use most effectively by measuring facilities' peak energy consumption per month, which would accurately reflect how energy efficient a cultivation system is with all of its components. If the committee chooses to regulate light efficiency based on PPE, we suggest a standard of 1.7 PPE to allow for efficient double-ended HPS lights. These fixtures are up to 30% more efficient than older legacy lighting but will be more affordable and straightforward to retrofit into existing systems. Roughly 90% of the industry uses HID lighting; forcing a transition to LEDs would be costly a costly transition to an unfamiliar technology. Although LED technology technically can provide similar quality and yields, most growers do not have the experience with this new equipment to maximize its potential. Until more data is available to cultivators so that they may be able to replicate their yields and terpene/cannabinoid profiles with LED lighting, it would be unwise to force a transition to LED lighting. LED technology has improved dramatically over the past few years, but the industry has not yet learned best practices to utilize them efficiently. The CASE report standards would create financial barriers of entry to the market and threaten existing businesses' financial stability. Energy rebate standards will be difficult to exceed or achieve at 2.1 and will not financially incentivize compliance. Setting PPE limits at 1.7 would allow more cultivators to acquire rebates from their utilities and make it more economically viable to transition to more efficient fixtures. We urge the CEC not to set standards that will restrict the growth of this vulnerable industry.