

**DOCKETED**

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*Comment Received From: SC Veterans Alliance, Inc.  
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**Opposition to Proposal for LED-Only Lighting in Cannabis Cultivation**

*Additional submitted attachment is included below.*



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Date: 26 October 2020

To: California Energy Commission

1516 Ninth Street

Sacramento, CA 95814

RE: Opposition to Proposed Energy Standard Requiring Only LED Lighting for Cannabis Cultivation

Dear California Energy Commission,

My name is Jason Sweatt and I am a US Army veteran and the cofounder and CEO of SC Veterans Alliance, Inc (SCVA). SCVA is a licensed, specialty-indoor cannabis cultivator (CAL18-00000270) founded in 2011 by two US military veterans on the mission of ensuring safe access to medicinal cannabis for qualified veteran patients **AT NO CHARGE**. We've accomplished this mission through our Veteran Compassion Program, which provides 100-150 veterans from all eras (WWII-present) with a monthly FREE donation of medical cannabis and cannabis products. I am writing this letter to oppose the proposed energy standard that would require LED-only lighting for cannabis cultivation and to respectfully request that the California Energy Commissioners vote against adoption of this proposed standard.

SCVA is licensed to cultivate 5,000 sqft. of indoor-grown, medical-grade cannabis in the City of Watsonville, CA. Currently, 20% of our cultivation canopy (1,000 sqft.) is supported by LED lighting. This is in our vegetative or immature plant room. We have found the LED lighting system we utilize in the vegetative room to be very efficient at producing healthy young plants, however our own internal research has shown that LED lighting systems are not yet capable of similar efficiency and productivity when it comes to full-flowering plants. While LED lighting does provide increased energy efficiency at our cultivation facility, it is **at least a 3x cost increase** versus traditional HPS lighting. This makes transitioning to LED-only lighting as a matter of policy extremely difficult for the average cultivator, as we still do not have access to regular banking and small business loans to support capital improvement expenditures of this size.

SCVA is committed to integrating sustainable agricultural practices into our cultivation policies and procedures wherever we can. Over 30% of the water we use is recaptured from our own HVAC system. As I mentioned above, LED lighting supports 20% of our current cultivation canopy. We expect to fully transition to LED lighting for our entire cultivation over the next several years on our own, but policy mandating their use by 2022 would put our business in jeopardy. At the same time, it would provide a competitive advantage to the black market and would diminish our ability to provide qualified military veterans with safe access to quality cannabis products as we have been doing for the past decade. With all this mind, I strongly encourage you to abandon this proposal, at least until such a time as licensed cannabis companies gain access to regular banking and capital improvement/small business loans to facilitate such an expensive transition.

Thank you for your time and consideration of this matter. Please feel free to contact me with any questions you may have via email at [Jason@scva.us](mailto:Jason@scva.us).

Respectfully,



Jason Sweatt  
CEO, SC Veterans Alliance