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Clarification to my comments of October 25, 2020 (re Docket 19-BSTD-03)

I have been advised that some parties may be misconstruing or mischaracterizing the comments I submitted last month to suggest that I somehow recommend allowing indoor cannabis cultivation to proceed in the absence of energy efficiency regulations. This is not correct.

Indeed, if California's energy policy is to align with its climate policy, indoor cannabis cultivation cannot continue, even with aggressive energy efficiency standards. I recognize that this is not a popular or convenient viewpoint and that there are formidable industry pressures to the contrary. However, after a decade of research on this issue, I've come to the conclusion that zero-energy outdoor cultivation—which has sufficed for millennia and is already conducted across most of California—is the most proven, technologically elegant, sustainable, economically viable, and ethical approach for minimizing the rising energy and environmental burden of cannabis production.

While I recognize that suspending indoor cultivation is beyond the authority of the California Energy Commission, I believe it is incumbent on the Commission to help the state put the cart back in front of the horse and promptly raise this issue to a level of government at which it can be thoughtfully addressed. Given the initial legalization of medical cannabis in 1996, the state has had nearly 25 years to get in front of this problem. Recent efforts to do so have fallen short. In particular, the enabling CEQA and EIR processes and the Negative Declaration arrived at in 2017 by the Bureau of Cannabis Cultivation are based on highly deficient and flawed analysis (see <https://sites.google.com/site/millsenergyassociates/topics/energy-efficiency/energy-up-in-smoke/a-cannabis-climate-train-wreck-in-progress?authuser=0>). Ideally, this should be resolved before more indoor facilities are approved for construction.

If, for the sake of expediency, unnecessary indoor cultivation is allowed to continue without further policy analysis, the Commission should consider requiring net-zero on-site energy designs (or perhaps just ZNE-readiness—and verification of ability to be converted to ZNE in the future—together with the proposed lighting and dehumidification standards).

Lastly, with regard to standard-setting, it should also be considered that these complex facilities particularly merit a "whole-buildings" techno-economic analysis rather than the present piecemeal examination of lighting and dehumidification.

As previously noted, the analysis underpinning my recommendations can be found here:

https://www.researchgate.net/publication/342364745_Energy_Use_by_the_Indoor_Can

nabis_Industry_Inconvenient_Truths_for_Producers_Consumers_and_Policymakers

Sincerely,
Evan Mills, Ph.D.